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File #: 207395

September 2, 2025

***VIA ELECTRONIC FILING***

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

**Re: Application of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval to (1) Construct The New Three Mile Island – Chanceford 500 kV Line And Chanceford – Peach Bottom 500 kV Transmission Line And (2) Rebuild the Existing Otter Creek – Conastone 230 kV Transmission Line For Future Double Circuit 500 kV Operations And The Rebuilt Chanceford – Doubs 500 kV Transmission Line And The Rebuilt Otter Creek – Conastone 500/230 kV Transmission Line, Located in Chanceford, East Hopewell, And Hopewell Townships In York County, Pennsylvania  
Docket No. A-2024-3051167**

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 II Data Requests regarding the above-captioned proceeding.

Respectfully submitted,



Garrett P. Lent  
Principal

GPL/sa  
Attachment

Matthew L. Homsher, Secretary  
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cc: Jordan Van Order (*via email; w/attachment*)

**PPL Electric Utilities Corporation  
Response to the Set II Data Requests of the  
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A-16                   Reference the Application, page 2, footnote 3. Please provide a detailed explanation as to why PPL Electric will rebuild the Otter Creek – Conastone 230 kV Transmission Line now if 500 kV operation is not currently needed.

PPL  
Response               The Otter Creek – Conastone 230kV line is currently in the ROW that will be utilized for the PA section of the new Chanceford – Doubs 500kV line. The Otter Creek – Conastone 230kV line is still needed even after construction of the Chanceford – Doubs 500kV line. Therefore, the Otter Creek – Conastone 230kV line will be rebuilt to double circuit 500kV to accommodate both the new Chanceford – Doubs 500kV line and the existing Otter Creek – Conastone 230kV line.

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A-17                   Reference the Application, Attachment 2, page 4. Please provide the point of interconnection with the MAIT system where the Three Mile Island – Chanceford and Chanceford – Peach Bottom 500 kV transmission line will change ownership.

PPL  
Response               The point-of-interconnection between MAIT and PPL Electric is proposed at PPL structures 1A and 1B, which are immediately adjacent to the existing Three Mile Island – Peach Bottom 500kV Line. Structures 1A and 1B will be installed by PPL as part of the Chanceford Project to form the Three Mile Island - Chanceford 500kV & Chanceford - Peach Bottom 500kV Lines. MAIT is responsible for bifurcation of the existing Three Mile Island – Peach Bottom 500kV Line and construction activities up to PPL Electric’s proposed structures 1A and 1B. MAIT and PPL are coordinating all project activities near the interconnection point.

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A-18                   Reference the Application, Attachment 2, page 4. Please explain why PPL Electric will run single bundle 1590 ACSR for several spans until it reaches proposed Structure 2.

PPL  
Response               PPL Electric proposes to run single bundle 1590 ACSR from Otter Creek 230kV Switchyard to proposed Structure 2 to connect the rebuilt Otter Creek – Conastone segment of line back to the Otter Creek 230kV Switchyard. PPL Electric's structures near Otter Creek 230kV Switchyard are designed for 230kV operation and will not be upgraded to 500kV as part of the Chanceford Project. Otter Creek 230kV Switchyard will remain operating at 230kV upon completion of the project, single bundle 1590 ACSR is used for 230kV construction connections to existing 230kV facilities.

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A-19                   Reference the Application, Attachment 2, page 5. Please clarify whether PPL Electric will install 60 new structures or 61 new structures.

PPL  
Response

PPL Electric proposes 60 new structures, below please see updated description (underlined) from Attachment 2, page 5 to provide greater clarity:

- Replace 57 existing steel monopole structures with 57 new steel monopole structures.
- Replace one existing two pole structure with a three pole structure 230 kV single circuit.
- Replace one existing steel monopole structure with a three pole structure 230 kV single circuit.
- Install one new steel monopole structure on the Chanceford Switchyard parcel

WITNESS: Joseph B. Lookup

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A-20                   Reference TUS Data Requests, Response to A-7. Please explain whether the remainder of the cost will still be paid for by Dominion, APS, PEPCO, Baltimore Gas and Electric, PECO Energy Company, and Delaware Power and Light.

PPL  
Response               Yes, the remaining costs will be paid for by Dominion, APS, PEPCO, Baltimore Gas and Electric, PECO Energy Company, and Delaware Power and Light customers.

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A-21                   Reference the Application for Eminent Domain, Paragraph 19. Please explain whether PPL Electric considered alternative locations for the Chanceford Switchyard and if so please explain why the proposed location was selected.

PPL  
Response

PPL Electric considered alternative locations for the Chanceford Switchyard as part of an extensive siting analysis. This analysis evaluated multiple potential sites based on engineering, environmental, and land use criteria, in addition to the social impacts, to identify a location suitable for the proposed switchyard and associated transmission structures.

Following the completion of the siting study, PPL Electric began negotiations with the owner of the preferred site identified through that process. PPL Electric's standard practice is to pursue voluntary acquisition of property for switchyard sites whenever possible, rather than relying on eminent domain. If negotiations with the preferred site owner were unsuccessful, PPL Electric proceeded to the next viable site identified in the study.

During this period, the owner of the property now proposed for the Chanceford Switchyard proactively contacted PPL Electric and offered to sell his land. Although this parcel was not originally selected as a result of the initial siting study due to its insufficient size, the opportunity to combine it with adjacent land from the Curran property made it suitable for the switchyard and transmission structures. This combined parcel met the necessary criteria and offered a willing seller, making it a practical and efficient choice for the project.

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A-22                   Reference the Application for Eminent Domain, Paragraph 19. Please provide a brief description of the Chanceford Switchyard's function.

PPL  
Response               The switchyard enables the connection and disconnection of transmission lines and equipment, allowing operators to direct power flow, perform maintenance, or isolate faults without disrupting the entire system. A 500kV switchyard is required to bifurcate the Three Mile Island – Peach Bottom 500kV Line. PJM does not permit tapping 500kV lines.

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A-23                   Reference the Application for Eminent Domain, Paragraph 21. Please explain whether the Chanceford 500 kV Project will address COR-TEN steel issues on the PPL Electric system. If so, please provide a detailed explanation as to how.

PPL  
Response               The Chanceford 500 kV Project will not address COR-TEN steel issues on the PPL Electric system.

The reference to COR-TEN steel issues was inadvertently included in the Application for Eminent Domain, and should not be considered as a basis for the necessity of the service to be provided by PPL Electric through the exercise of the power of eminent domain is necessary or proper for the service, accommodation, convenience or safety of the public.

WITNESS: Joseph B. Lookup

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A-24                   Reference the Petition for Zoning Waiver. Please explain whether Chanceford Township has objected to the proposed Chanceford 500 kV Switchyard.

PPL  
Response              Chanceford Township has not objected to the proposed Chanceford 500 kV Switchyard.

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A-25                   Reference the Petition, Paragraph 39. Please provide the specific Chanceford Township zoning ordinance PPL Electric’s proposed Chanceford 500 kV Switchyard is unable to comply with and provide a detailed explanation as to why.

PPL  
Response

A copy of the Chanceford Township Zoning Ordinance of 2016, §§ 101-602, *et seq.* (hereinafter, the “Zoning Ordinance”), was attached to the Petition as Appendix B. As explained in Paragraph 39 of the Petition, Section 431.1 of the Chanceford Township Zoning Ordinance imposes specific requirements upon the design and construction of “Public Utility or Similar Building or Facility,” specifically “buildings” (defined by Zoning Ordinance § 601) or “structures” (defined by Zoning Ordinance § 601), i.e., Section 431.1 provides that “that buildings or structures erected for these utilities shall be subject to the following regulations:. . .”

The special exception criteria contained in Section 431.1 may be inconsistent with PPL Electric’s design standards, which will have a negative impact on safety and reliability. Specifically, PPL Electric may not be able to comply with certain building design requirements, and planting and fence requirements, as required by the Chanceford Township. The special exception process also allows the Chanceford Township Zoning Hearing Board to place additional conditions on the Public Utility Building that may be inconsistent with PPL Electric’s design criteria. Finally, PPL Electric is proposing to construct a non-agricultural use on land that is not low-quality soils. This would be a violation of Sec. 207.9 of the zoning ordinance.

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As a general rule, public utility facilities are exempt from local ordinances. *PPL Elec. Utils. Corp. v. City of Lancaster*, 654 Pa. 203, 214 A.3d 639, 655 (Pa. 2019) (affirming that the General Assembly has “vested in the [PUC] exclusive authority over the complex and technical service and engineering questions arising in the location, construction and maintenance of all public utility facilities”). The basis for the Petition is not that PPL Electric is unable to comply with any provision of the Zoning Ordinance; rather, it is that the Zoning Ordinance is preempted except with respect to the limited exception applicable to public utility “buildings” under 53 P.S. § 10619.

Through the Petition, PPL Electric requested that the Commission find that the Control Equipment Shelter at the proposed Chanceford Switchyard are reasonably necessary for the convenience or welfare of the public and are, therefore, exempt from the requirements of the Chanceford Township Zoning Ordinance that may, in the Township’s opinion, impose any restriction, condition, or regulation on the construction of the Control Equipment Shelter at the Chanceford Switchyard. Petition ¶ 48, n.16.

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A-26                   Reference the Petition, Paragraph 39, section “h”. Please explain whether the proposed Chanceford 500 kV Switchyard will be located on land that is not of low quality for agricultural uses. If so, please provide a detailed explanation as to why.

PPL  
Response

The proposed Chanceford 500 kV Switchyard will not be located on low-quality agricultural soils as defined in Article VI, Section 602 of the Chanceford Township Zoning Ordinance. Such soils include categories GbD, MOC, MOD, MOE, MPD, MRF, or W (Water) as classified in the 1995 Update of the Soil Survey of York County, Pennsylvania by the U.S. Department of Agriculture, Natural Resources Conservation Service. Due to the size of the required switchyard, no sites with low-quality agricultural soil that were large enough to accommodate the switchyard were noted during the switchyard siting process. It should also be noted that there are some limited amounts of these soils on the properties being obtained, however not in the areas primarily proposed for construction and not in significant amounts. Furthermore, attempting to locate the switchyard on any areas of the properties containing low-quality soils would result in additional impacts from the overall project. For example, the connecting lines would need to be longer than proposed to reach such areas on the northern and western areas of the parcels.

As referenced in PPL’s response A-21, PPL Electric considered alternative locations for the Chanceford Switchyard as part of an extensive siting analysis. This analysis evaluated multiple potential sites based on engineering, environmental, and land use criteria, in addition to the social impacts, to identify a location suitable for the proposed switchyard and associated transmission structures. Subsequent negotiations with the property owner and an additional

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willing seller of an adjacent parcel further led to the preferred layout and location of the switchyard and lines within the preferred site properties.

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A-27                    Please explain what impact, if any, the control building to be constructed at the Chanceford 500 kV Switchyard will have on the natural environment, including on: (a) air quality, (b) water quality, (c) noise, and (d) any other environment-related area relevant to the construction of the control building.

PPL  
Response                The proposed control building will be located within the Chanceford 500 kV Switchyard, which is part of the Chanceford Transmission Project currently under review. The control building is not expected to have any adverse impact on the natural environment, including air quality, water quality, noise, or other relevant environmental areas as described below.

(a) Air Quality:

The control building will not emit any airborne pollutants during construction or operation. It is a building used to house control equipment and does not include sources of air emissions.

(b) Water Quality:

There will be no impact to the waters of the Commonwealth during construction or throughout the operational life of the control building. The building does not require water for cooling or other operational uses. It will be constructed on a gravel surface within the switchyard, which helps prevent sedimentation and runoff. Additionally, an erosion and sedimentation control plan will be developed in accordance with the National Pollutant Discharge Elimination System (NPDES) program, administered by the Pennsylvania Department of Environmental Protection (PA DEP). This plan will incorporate best management practices (BMPs) to prevent construction-related sediments from entering nearby water bodies.

(c) Noise:

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The control building will not generate audible noise during operation. Any noise associated with construction activities will be temporary and mitigated through standard construction practices and scheduling.

(d) Other Environmental Considerations:

The control building will be constructed within the boundaries of the proposed switchyard, which has been designed to minimize environmental impacts. No sensitive habitats or protected resources are expected to be affected. All construction activities will comply with applicable environmental regulations and permitting requirements.

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A-28                    To the extent the control building to be constructed at the Chanceford 500 kV Switchyard will adversely impact the natural environment, please explain what measures, if any, PPL Electric has taken or intends to take to mitigate that impact.

PPL  
Response

As noted in the response to A-27, the control building will be constructed entirely within the footprint of the proposed Chanceford 500 kV Switchyard and is not expected to adversely impact the natural environment. Nevertheless, PPL Electric has incorporated measures to ensure that any potential impacts associated with construction are effectively mitigated.

The control building will be included within the scope of the NPDES permit for the switchyard. As part of this permit, an erosion and sedimentation control plan will be developed in accordance with Pennsylvania Department of Environmental Protection requirements. This plan will implement best management practices (BMPs) to prevent construction-related sediment from entering the waters of the Commonwealth.

In addition, the siting of the switchyard—including the control building—was carefully planned to avoid direct impacts to sensitive environmental resources. These include wetlands, cultural resources, and habitats for rare, threatened, and endangered species.

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A-29                    Please explain whether any approvals are needed from any state agencies (other than the Pennsylvania Public Utility Commission) or any federal agencies related to the environmental impact of the control building to be constructed at the Chanceford 500 kV Switchyard. If so, please state whether such approvals have been obtained and if so, when such approvals were obtained. If necessary approvals have not yet been obtained, please explain why and when they will be obtained.

PPL  
Response                As mentioned in the response to A-27 and A-28, the control building will be encompassed as part of the NPDES permit for the switchyard. As of 8/28/2025, PPL has applied for an NPDES permit for the switchyard from the PA DEP and York County Conservation District. The agencies have found the application complete, and PPL has provided responses to all the technical questions received from the reviewing agencies. PPL anticipates a permit to be issued before 10/17/2025, and construction of the switchyard and affiliated infrastructure will not commence until all required regulatory approvals have been received.

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A-30                   Reference TUS Data Requests, Response to A-1. Please clarify whether the 1.4-mile segment of the new Three Mile Island – Chanceford 500 kV Transmission Line and the Chanceford – Peach Bottom 500 kV Transmission Line will be located entirely within new right-of-way.

PPL  
Response               The 1.4-mile segment of the new Three Mile Island – Chanceford 500 kV Transmission Line and the Chanceford – Peach Bottom 500 kV Transmission Line will be located entirely within new right-of-way apart from a small area where it crosses the existing Otter Creek – Conastone Transmission Line. In this location, it will occupy both new and existing right of way. See Figure 3-1 page 2 of 17 in the Siting Application.



September 10, 2024

**PNDI Number: 806386**  
Version: Final\_1; 2/14/24

**Emily Wood**  
**Woodland Design Associates, Inc.**  
119 Lincoln Street  
Honesdale, PA 18431-2151  
Email: emilywood@woodlanddesign.com (hard copy will not follow)

**Re: Conastone-Otter Creek 230kV Line Rebuild  
York County, PA**

Dear Emily Wood,

Thank you for the submission of your field survey for Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt Number **806386 (Final\_1)** for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

**No Impact Anticipated per Avoidance, Mitigation, and Monitoring**

PNDI records indicate species or resources under DCNR's jurisdiction are located in the vicinity of the project. DCNR requested a botanical survey for multiple species on February 20, 2024. A survey was conducted within potentially suitable habitat area by Andrew Nevin of Thompson Environmental Surveys & Permitting on May 7, 8, 28 and June 4 and 13.

During the site botanical investigation three species of concern were identified within the project study area, but outside the immediate project limit of disturbance. These species include *Magnolia tripetala* (Umbrella Magnolia; PA Threatened), *Nabalus serpentaria* (Lion's foot; PA Proposed Threatened), and *Packera anonyma* (Plain Ragwort; PA Rare).

Due to the proximity of the *Packera anonyma* population to the project footprint, there is some concern for accidental disturbances. Please surround the *Packera anonyma* population with orange protective fencing to prevent unplanned impacts. Impacts on the other two plant populations (*Magnolia tripetala* and *Nabalus serpentaria*) are unlikely.

With the addition of these measures, DCNR has determined that no impact is likely. No further coordination with our agency is needed for this project.

**Recommended Best Management Practices:**

- Use a conservative approach to project design that minimizes permanent and temporary disturbances to soil and native vegetation. This will conserve habitat and limit opportunities for invasive plants.
- Clean boot treads, tools, construction equipment, and vehicles thoroughly (especially the undercarriage and wheels) before they are brought on site. This will remove invasive plant seeds and invasive earthworms/cocoons that may have been picked up at other worksites.

- Use clean project materials (e.g., weed-free straw) or materials native to the worksite to avoid introducing invasive species from contaminated sources.
- Revegetate or cover disturbed soil and stockpiles quickly to discourage the germination of invasive plants. Implement proper erosion control practices to stabilize soil and reduce runoff.
- Do not use seed mixes that include invasive species. More information about invasive plants in Pennsylvania can be found at the following link: <http://www.dcnr.pa.gov/Conservation/WildPlants/InvasivePlants/Pages/default.aspx>
- Use habitat appropriate seed mixes. For example, use a riparian seed mix when reseeding along a waterway. The Bureau of Forestry Planting & Seeding Guidelines can be found at the following link for recommendations: [http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr\\_20031083.pdf](http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr_20031083.pdf)
- Use native plants for landscaping, revegetation, and stormwater management. Do not use nonnative invasive species. Reduce the area of lawn and impermeable surfaces to the fullest extent practicable in favor of native gardens or habitat restoration (e.g., forest, meadow, wetland, etc.). More information about lawn conversion can be found at the following link: <https://www.dcnr.pa.gov/Conservation/Water/LawnConversion/Pages/default.aspx>
- Plant forest buffers where trees were historically present along streams, wetlands, and bodies of water. Buffers should be a minimum of 35 feet in width (ideally at least 100 feet in width). Where trees are not appropriate (e.g., powerline rights-of-way), buffer with native shrubs and herbaceous plants. More information about riparian buffers can be found at the following link: <https://www.dcnr.pa.gov/Conservation/Water/RiparianBuffers/Pages/default.aspx>
- Manage rights-of-way for diverse native plant communities and wildlife (e.g., monarch butterfly). In seed mixes, include wildflowers that have overlapping bloom periods and provide forage for pollinators throughout the growing season. Avoid blanket herbicide applications; instead, spot-treat undesirable tall woody vegetation and invasive weeds. Where mowing is necessary, reduce frequency to once every few years during the dormant season (i.e., after first frost in late fall and before bird nesting in early spring), leaving some refugia for overwintering wildlife.
- Monitor for invasive plants before, during, and after project activities and promptly control any identified infestations. Frequent monitoring allows for early detection and rapid response.

**Should you have any questions or concerns, please contact Alexander Dogonniuck, Ecological Information Specialist, by phone (717-783-3913) or via email (c-adogonni@pa.gov).**

Sincerely,



Greg Podnieszinski, Section Chief  
Natural Heritage Section

WITNESS: Joseph B. Lookup

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A-32                    Reference TUS Data Requests, Response to A-5. Please provide a copy of Attachment A-5.

PPL                    Please see attached.  
Response

PNDI # \_\_\_\_\_ USFWS Project # \_\_\_\_\_

**U.S. FISH AND WILDLIFE SERVICE**  
110 Radnor Road, Suite 101, State College, PA 16801

This responds to your inquiry about a PNDI Internet Database search that resulted in a potential conflict with a federally listed, proposed or candidate species.

**PROJECT LOCATION INFORMATION**

**MISC INFORMATION**

County: \_\_\_\_\_

Date received by FWS: \_\_\_\_\_

Township: \_\_\_\_\_

USFWS COMMENTS      EMAILED      MAILED

Email: \_\_\_\_\_

To: \_\_\_\_\_

Affiliation: \_\_\_\_\_

**SPECIFIC PROJECT:** \_\_\_\_\_

**FISH AND WILDLIFE SERVICE COMMENT(s):**

\_\_\_\_\_ ***NO EFFECT***

Except for occasional transient species, no federally listed, proposed or candidate species under our jurisdiction are known or likely to exist in the project area. Should project plans change, or if additional information on listed or proposed species becomes available, this determination may be reconsidered.

\_\_\_\_\_ ***NOT LIKELY TO ADVERSELY AFFECT***

The federally listed \_\_\_\_\_ occurs or may occur in or near the project area. However, based on our review of the information provided, including the project description and location ( \_\_\_\_\_

\_\_\_\_\_), no adverse effects to this species are likely to occur. If there is any change in the location, scale, scope, layout or design of the project, further consultation or coordination with the Service will be necessary.

The above determination is valid for two years from the date of this letter. In addition, this response relates only to federally listed, proposed, and candidate species under our jurisdiction, based on an office review of the proposed project's location and anticipated impacts. No field inspection of the project area has been conducted by this office. *Please reference the above PNDI # and USFWS Project # in any future correspondence regarding this project.*

This review was conducted by the biologist listed below. He/she can be contacted at 814-206-(Extension).

\_\_\_\_\_ Pamela Shellenberger (x7459)

\_\_\_\_\_ Nicole Ranalli (x7455)

\_\_\_\_\_ Richard Novak (x7477)

\_\_\_\_\_ Monica Mestre (x7462)

\_\_\_\_\_ Jennifer Kagel (x7451)

\_\_\_\_\_ Sze Wing Yu (x7461)

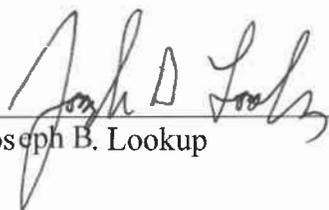
SIGNATURE:

\_\_\_\_\_  
Supervisor, Pennsylvania Field Office

## 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: September 2, 2025

  
\_\_\_\_\_  
Joseph B. Lookup