

COMMONWEALTH OF PENNSYLVANIA



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January 7, 2026

Via Electronic Filing

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

Re: Letter of Notification of PPL Electric Utilities Corporation filed pursuant to 52 PA. Code Chapter 57 with respect to the approval to build approximately 1.1 miles of new parallel double circuit 230 kV transmission taps that are needed to connect the existing Susquehanna-Harwood #1 & #2 transmission lines on the New Tomhicken 230 kV switchyard that are respectively located in Luzerne County, Pennsylvania; Docket No. A-2025-3059443

Dear Secretary Homsher:

Attached for electronic filing, please find the Office of Consumer Advocate's Protest in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Josiah B. Harmar
Josiah B. Harmar, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 338426
Email: JHarmar@paoca.org

Enclosures

cc: The Honorable Charles E. Rainey, Jr. (Email Only: crainey@pa.gov)
Paul Diskin, TUS (Email Only: pdiskin@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

Letter of Notification of PPL Electric :
Utilities Corporation filed pursuant to 52 PA. :
Code Chapter 57 with respect to the approval :
to build approximately 1.1 miles of new :
parallel double circuit 230 kV transmission : Docket No. A-2025-3059443
taps that are needed to connect the existing :
Susquehanna-Harwood #1 & #2 :
transmission lines on the New Tomhicken :
230 kV switchyard that are respectively :
located in Luzerne County, Pennsylvania. :

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Protest, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 7th day of January, 2026.

SERVICE BY E-MAIL ONLY

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Phone: 717-783-5048
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Dated: January 7, 2026

Jacob Guthrie
Assistant Consumer Advocate
PA Attorney I.D. # 334367
Email: JGuthrie@paoca.org

Counsel for:
Darryl A. Lawrence
Consumer Advocate

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of PPL Electric Utilities :
Corporation filed pursuant to 52 PA Code :
Chapter 57 with respect to the approval to :
build approximately 1.1 miles of new parallel :
double circuit 230 kV transmission taps that : Docket No. A-2025-3059443
are needed to connect the existing :
Susquehanna-Harwood #1 & #2 transmission :
lines on the New Tomhicken 230 kV :
switchyard that are respectively located in :
Luzerne County, Pennsylvania :

PROTEST OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code Sections 5.51, *et seq.*, the Office of Consumer Advocate (OCA) files this Protest to the Letter of Notification (LON) of PPL Electric Utilities Corporation (PPL or Company). On December 19, 2025, PPL filed the above-captioned LON with the Pennsylvania Public Utility Commission (Commission), under 52 Pa. Code Sections 57.72(d)(1)(iii) and (iv), to build approximately 1.1 miles of new parallel double circuit 230 kilovolt (kV) transmission taps that PPL claims are necessary to connect the existing Susquehanna-Harwood #1 and #2 transmission lines to the new Tomhicken 230 kV Switchyard. PPL also proposes two new 0.1-mile-long 230 kV transmission lines to connect the Tomhicken 230 kV switchyard to a new substation owned by an unnamed customer requesting interconnection to PPL’s 230 kV transmission system. The project is located in Luzerne County, Pennsylvania.

PPL is a “public utility” and an “electric distribution company” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code.¹ PPL owns approximately 5,000 miles of transmission lines operating at 69 kV or higher, approximately 375 substations with a capacity of

¹ 66 Pa.C.S. §§ 102, 2803.

10 megavolt amperes (MVA) or more, and approximately 43,000 miles of distribution lines operating at less than 69 kV.² PPL furnishes electric service to approximately 1.5 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.³

On December 30, 2025, the OCA responded to PPL's LON by submitting a Notice of Intervention and Public Statement. The OCA now files this Protest to protect the interests of PPL's customers in this proceeding.

Specifically, the OCA avers as follows:

1. The name and contact information of the protestant is:

Darryl A. Lawrence, Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Telephone: 717-783-5048

Throughout this Protest, the protestant will be referred to as the Office of Consumer Advocate or OCA.

2. The names and contact information for the OCA's attorneys for the purpose of receiving service of all documents in this proceeding are as follows:

Jacob Guthrie
Assistant Consumer Advocate
JGuthrie@paoca.org

Josiah B. Harmar
Assistant Consumer Advocate
JHarmar@paoca.org

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923

² PPL LON at ¶ 5.

³ PPL LON at ¶ 4.

Telephone: 717-783-5048

3. The Pennsylvania General Assembly, by statute, authorizes the OCA to represent the interests of Pennsylvania's utility consumers in all matters before the Commission.⁴

4. The Commission has jurisdiction over the lines in question and must examine the LON.⁵

5. The Commission may not grant the LON and approve the project in question, unless it finds:

- (1) That there is a need for it;
- (2) That it will not create an unreasonable risk of danger to the health and safety of the public;
- (3) That it is in compliance with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth, and
- (4) That it will have minimum adverse environmental impact, considering the electric power needs of the public, the state of available technology and the available alternatives.⁶

6. Regarding this LON, the Commission must determine whether the Project, as proposed, is necessary and must examine the Project's potential adverse impact on the area's residents and natural environment, as compared with any potential reliability improvements.

7. The OCA is concerned that PPL has not adequately and thoroughly explored various alternatives to its proposed Project, including, but not limited to, grid enhancing technologies, demand side options, and whether building out the existing 230 kV network is the best long-term option for improved reliability, resiliency, and ratepayer affordability.

8. The OCA is also concerned by the estimated cost of building this Project. PPL currently estimates a \$59.9 million total cost.

⁴ 71 P.S. §§ 309-1, *et seq.*

⁵ 52 Pa. Code §§ 57.71–57.77.

⁶ 52 Pa. Code § 57.76.

9. The Commission should scrutinize PPL’s allocation of costs between PPL’s customer base, broadly, and the interconnecting customer, specifically, and permit the OCA to conduct further investigation. According to PPL, its transmission network customers will be responsible for \$38.4 million, or 64%, of the total cost of the project, with the remaining \$21.8 million, or 36%, being allocated to the interconnecting customer.⁷

10. The Project “will most immediately serve the substation-owning Customer,” with a load increasing from 240 megawatts (MW) initially, “to approximately 1,980 MW by 2033.”⁸ In other words, PPL acknowledges that the interconnecting customer is the proximate, “but-for” cause of PPL’s decision to build the Project with its attendant costs for its broader transmission consumer base.

11. PPL’s Letter of Notification appears to contain inconsistent information about the interconnecting customer’s need, claiming first that the customer will start at 240 MW and increase to approximately 1,980 MW by 2033, and then claiming that the customer will start at 12 MW and increase to approximately 965 MW by 2031.⁹

12. Due to the speculative and uncertain nature of the details PPL provided about the proposed Project, as evidenced by the inconsistent projected maximum load, PPL’s proposal presents a heightened risk of stranded costs which the Commission should fully address through this proceeding.¹⁰

13. PPL’s assessment of “need” rests on the vague and unsubstantiated premise that these projects, in the aggregate, “will ultimately reduce the transmission rates charged by PPL Electric

⁷ PPL LON at ¶¶ 38-39.

⁸ PPL LON at ¶ 10.

⁹ Compare PPL LON at ¶ 10 with PPL LON, Attach. 1 at 6.

¹⁰ See ADAIT ARUN, BUBBLE OR NOTHING: DATA CENTER PROJECT FINANCE 43-48, 57-58, 60 (Ctr. for Pub. Enter. 2025), <https://publicenterprise.org/report/bubble-or-nothing/> (describing the speculative nature of investment in new large data center loads which creates an atypical risk of stranded costs under current market conditions).

to its other transmission level customers.”¹¹ This claim warrants the Commission’s close examination.

14. This Project may contribute to increased energy, ancillary services, and capacity costs, as well as increased capacity scarcity, that would harm Pennsylvania’s retail electricity consumers.¹²

15. The environmental impacts of PPL’s proposed Project warrant thorough review and implicate the Commission’s duties of loyalty, impartiality, and prudence to Pennsylvania’s environmental public trust under Article I, Section 27 of Pennsylvania’s Constitution, the Environmental Rights Amendment.¹³

16. The Commission should subject PPL’s request to a thorough formal investigation and evidentiary hearings. In so doing, the Commission should allow for notice and opportunity to be heard for all affected parties, including public input hearings throughout the areas that may be affected by this Project. PPL has the burden of proof in this matter, and the written testimony submitted in support of its request should be subject to cross-examination by the parties.

17. The OCA reserves the right to raise additional issues as the case proceeds and as the OCA obtains further information regarding the Project.

¹¹ PPL LON at ¶ 11.

¹² See *Complaint of Independent Market Monitor for PJM v. PJM Interconnection, L.L.C.*, Complaint of the Independent Market Monitor for PJM, at pp. 3–5, Fed. Energy Regul. Comm’n Docket No. EL26-30-000 (Nov. 25, 2025), https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20251125-5275 (summarizing PJM’s current dysfunction).

¹³ See *Twp. of Marple v. Pa. PUC*, 294 A.3d 965, 973–74 (Pa. Commw. Ct. 2023) (holding PUC decision deficient, vacating, and remanding for “constitutionally sound environmental impact review”); *Pa. Env’tl. Def. Found. v. Commonwealth*, 161 A.3d 911, 931 n.23 (Pa. 2017) (“[A]ll agencies and entities of the Commonwealth government, both statewide and local, have a fiduciary duty to act toward the corpus with prudence, loyalty, and impartiality.” (citations omitted)).

WHEREFORE, the Office of Consumer Advocate respectfully requests that the Pennsylvania Public Utility Commission not approve this Project at this time due to the issues raised above and the need for additional information. The Office of Consumer Advocate respectfully requests that the Pennsylvania Public Utility Commission set this matter for evidentiary hearings to permit a full investigation into the proposed Project.

Respectfully submitted,

/s/ Josiah B. Harmar

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