
Garrett P. Lent
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File #: 209803

March 16, 2026

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: Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For Approval To Rebuild 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 filing is the Prehearing Memorandum of PPL Electric Utilities Corporation (“PPL Electric”) in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Garrett P. Lent

GPL/bfc
Attachment

cc: The Honorable Erin L. Gannon (*via email; w/attachment*)
The Honorable John Coogan (*via email; w/attachment*)

Matthew Homsher, Secretary
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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 Letter of Notification has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 57.72(d)(3).

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: Alison 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
Commonwealth Keystone Building
400 North Street, Fifth Floor
Harrisburg, Pennsylvania 17120
Attn: Jeffrey M. Spotts, Chief Counsel

Pennsylvania Historical and Museum
Commission
Bureau for Historic Preservation
Commonwealth Keystone Building,
Second Floor
400 North Street
Harrisburg, Pennsylvania 17120-0053
Attn: Catherine N. Lantzy, Chief Counsel

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

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

Pennsylvania Fish and Boat Commission
Centre Region Office
595 East Rolling Ridge Drive
Bellefonte, Pennsylvania 16823-9620
Attn: Christopher A. Urban, Chief, Natural
Diversity Section

Pennsylvania Office of Small Business
Advocate
555 Walnut Street
1st Floor Forum Place
Harrisburg, Pennsylvania 17101
Attn: NazAarah Sabree, Small Business
Advocate

U.S. Army Corps of Engineers
Baltimore District Corporate
Communication Office
2 Hopkins Plaza
Baltimore, Maryland 21201
Attn: Planning Division

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

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

Luzerne County Conservation District
325 Smiths Pond Road
Shavertown, Pennsylvania 18708
Attn: John (Jay) Wilkes, Chairman and
Public Director

Hazle Township
P.O. Box 506,
Harleigh, PA 18225

NP Hazleton Holdings 1, LLC
3315 North Oak Trafficway,
Kansas City, Missouri 64116

VIA EMAIL AND FIRST-CLASS MAIL

Jacob Guthrie
Josiah B. Harmar
PA Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923
JGuthrie@pacoa.org
JHarmar@pacoa.org
(Counsel for OCA)

Erika Cook
38 Red Rock Road
Sugarloaf, PA 18249
Elcook33@gmail.com

John Zola
17 Dagostin Road
Sugarloaf, PA 18249
zolajj@gmail.com

Dated: March 16, 2026



Garrett P. Lent

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter Of Notification Of PPL Electric :
Utilities Corporation, Filed Pursuant To 52 :
Pa. Code Chapter 57 Subchapter G, For : Docket No. A-2025-3059443
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 to :
the New Tomhicken 230 kV Switchyard :
that are Respectively Located in Luzerne :
County, Pennsylvania :

**PREHEARING CONFERENCE MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION**

TO ADMINISTRATIVE LAW JUDGES ERIN L. GANNON AND JOHN M. COOGAN:

Pursuant to 52 Pa. Code § 5.224(c) and the January 14, 2026, Prehearing Conference Order, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits this Prehearing Conference Memorandum.

I. SERVICE OF DOCUMENTS

1. PPL Electric’s attorneys in this proceeding are Michael J. Shafer, Esquire, David B. MacGregor, Esquire, Garrett P. Lent, Esquire, and Hayley E. Wilburn, Esquire. PPL Electric requests that all documents be served on:

David B. MacGregor, Esquire
Garrett P. Lent, Esquire
Hayley E. Wilburn, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
glent@postschell.com
hwilburn@postschell.com

Michael J. Shafer
PPL Services Corporation
645 Hamilton St, Suite 700
Allentown, PA 18101
Phone: 610-774-2599
Fax: 610-774-4102
E-mail: mjshafer@pplweb.com

Please be advised that Mr. Garrett P. Lent will speak as the lead attorney for PPL Electric for purposes of the prehearing conference. However, other counsel for PPL Electric will be participating and available during the telephonic prehearing conference as needed.

2. PPL Electric agrees to receive service of documents electronically in this proceeding. Further, it is requested that Michelle L. Bartolomei (mbartolomei@pplweb.com), Thomas Connolly (tconnolly@postschell.com), and Brittney Corey (bcorey@postschell.com) be included on all electronic mail sent in this proceeding.

3. PPL Electric's attorneys are authorized to accept service on behalf of PPL Electric in this proceeding. PPL Electric requests that the Commission and all parties of record serve copies of all discovery requests and answers, correspondence, Commission Orders, and any other documents issued in this proceeding on its attorneys.

II. PROCEDURAL HISTORY

4. This proceeding was initiated on December 19, 2025, when PPL Electric filed the above-captioned "Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For 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 to the New Tomhicken 230 kV Switchyard that are Respectively Located in Luzerne County, Pennsylvania" (hereinafter, the "Letter of Notification") with the Pennsylvania Public Utility Commission ("Commission"). In the Letter of

Notification, PPL Electric requested Commission approval to build approximately 1.1 miles of new double-circuit 230 kilovolt (“kV”) transmission taps (“Tap Lines”) that are needed to connect the existing Susquehanna-Harwood #1 and #2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard (“Tomhicken Switchyard”) (the “Project”). The Project also includes the construction of two new 0.1-mile-long 230 kV transmission lines (“Connecting Lines”) from the Tomhicken 230 kV Switchyard to a new customer-owned 230-34 kV substation. The new 230 kV Connecting Lines, Tap Lines, and Tomhicken 230 kV Switchyard are located in Hazle Township, Luzerne County, Pennsylvania.

5. On December 23, 2025, the Commission issued a Secretarial Letter acknowledging receipt of the Letter of Notification.

6. On December 30, 2025, the Office of Consumer Advocate (“OCA”) filed a Notice of Intervention and Public Statement.

7. Also on December 30, 2025, the Commission’s Bureau of Technical Utility Services (“TUS”) issued a set of data requests.

8. On January 7, 2026, the OCA filed a Protest.

9. On January 9, 2026, PPL Electric timely filed its responses to TUS’s December 30, 2025 data requests.

10. On January 14, 2026, the Commission issued a Prehearing Conference Order.

11. On January 15, 2026, the Commission issued an Initial Call-In Telephonic Prehearing Conference Notice for the above-captioned docket. Administrative Law Judges Erin L. Gannon and John M. Coogan (the “ALJs”) were assigned to preside over the above-captioned proceedings.

12. On January 21, 2026, the Commission issued a Secretarial Letter acknowledging receipt of the Letter of Notification and providing a copy of the Publication Notice to appear in the Saturday, January 31, 2026, issue of the Pennsylvania Bulletin.

13. On February 19, 2026, PPL Electric filed Affidavits and Proofs of Publication showing that Public Notice for the Letter of Notification was published in the Wilkes Barre Citizens' Voice and Wilkes Barre Times Leader on January 28, 2026, and February 4, 2026, pursuant to ALJ Gannon's directive in a January 12, 2026, email.

14. On March 12, 2026, Erika Cook filed a Protest.

15. On March 13, 2026, John Zola filed a Protest.

16. Pursuant to 52 Pa. Code § 5.224(c) and the January 14, 2026 Prehearing Conference Order, PPL Electric hereby submits this Prehearing Conference Memorandum.

III. ISSUES

17. In the Letter of Notification, PPL Electric has requested Commission Approval to build the Susquehanna-Tomhicken #1 and #2 230 kV and Tomhicken-Harwood #1 and #2 230 kV tap lines and to construct Connecting Lines from the new Tomhicken Switchyard to a customer-owned 230-24 kV substation. PPL Electric intends to demonstrate that the Project is required to accommodate multiple customers' requests to serve new and future load in the area.

18. PPL Electric also intends to demonstrate that the Project will not create any unreasonable risk of danger to the public health or safety, and that the proposed lines will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code ("NESC") minimum standards and all applicable legal requirements.

19. In addition, the Company will show that the proposed Project is in compliance with applicable statutes and regulations providing for the protection of the natural resources of this

Commonwealth. PPL Electric will also continue to consult with the jurisdictional agencies regarding potential impacts to protected species, complete all required surveys, obtain all necessary approvals and permits for Project construction, and comply with conditions placed on those permits.

20. Furthermore, PPL Electric intends to demonstrate that the Project will have a minimum adverse environmental impact considering the electric power needs of the public. As explained in the Letter of Notification, the proposed Tomhicken Switchyard will be constructed on the same customer-owned parcel as the customer-owned 230-34 kV substation and facilities, allowing PPL Electric to split the transmission lines on the customer-owned parcel and extend these lines to the Tomhicken Switchyard, significantly reducing the amount of new transmission line construction necessary, and reducing impacts to adjacent landowners and to the surrounding environment.

21. Finally, PPL will demonstrate that it will acquire all right-of-way (“ROW”) necessary to construct the Project from the same customer who will own the 230-34 kV substation, further reducing impacts to adjacent landowners and to the surrounding environment.

IV. WITNESSES

22. PPL Electric presently intends to offer the following additional witness to testify in this proceeding on the following subject matters, to the extent necessary:

Witness	Subjects Addressed
Joseph B. Lookup Director of Asset Management PPL Services Corporations 2 North 9 th Street Allentown, PA 18101	Transmission System Planning PJM Interconnection, LLC Process Need For The Summit-Lackawanna Project Engineering and Design of The Summit-Lackawanna Project

The Company's attachments and exhibits included in its initial filing fully support the Letter of Notification.

23. PPL Electric also reserves the right to call and present additional witnesses and testimony as it deems necessary, and/or to address any issues that may arise during the course of the proceeding.

V. DISCOVERY

24. To date, PPL Electric has received formal data requests for documents from TUS and has diligently responded to these requests.

25. At this time, OCA has proposed modifications to the standard timelines for discovery set forth in the Commission's regulations, and PPL Electric has agreed to these modifications, which are as follows:

- Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
- Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
- Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within five (5) business days of service of written objections.
- Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
- Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.

- Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

26. PPL Electric also encourages the use of informal discovery to expedite the discovery process.

27. Finally, PPL Electric proposes the use of electronic service of discovery responses.

VI. LITIGATION SCHEDULE

28. PPL Electric and OCA have engaged in discussions regarding the schedule for this proceeding. These discussions remain ongoing as of the submission of this Prehearing Memorandum. At this time, PPL Electric proposes that the following schedule be adopted, which it has preliminarily shared with OCA:

Filing	December 19, 2025
Prehearing Conference	March 18, 2026
Company Direct Testimony	May 18, 2026
Other Parties' Direct Testimony	July 2, 2026
Rebuttal Testimony	August 3, 2026
Surrebuttal Testimony	August 19, 2026
Written Rejoinder	August 28, 2026
In-Person Evidentiary Hearings In Harrisburg	September 9-10, 2026
Main Brief	October 1, 2026
Reply Brief	October 16, 2026

PPL Electric will continue to work with OCA, and any other parties to intervene in this matter prior to the scheduled Prehearing Conference, to develop a mutually agreed upon schedule. PPL

Electric is willing to work the parties to accommodate potential scheduling conflicts for the parties' witnesses to attend and testify at the evidentiary hearings.

VII. SETTLEMENT

29. As of this time, no settlement discussions have been held. PPL Electric remains open and available for settlement discussions with the other parties and would support initiatives to begin settlement discussions at the earliest possible date.

Respectfully submitted,



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Date: March 16, 2026

Attorneys for PPL Electric Utilities Corporation