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File #: 209803

April 2, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17101

**Re: 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 on the New Tomhicken 230 kV Switchyard that are Respectively Located in Luzerne County, Pennsylvania
Docket No. A-2025-3059443**

Dear Secretary Homsher:

Enclosed for filing is the above-captioned Preliminary Objection of PPL Electric Utilities Corporation (“PPL Electric”) to the Protest of John Zola in the above-referenced matter.

Copies will be provided per the attached Certificate of Service.

Respectfully submitted,



Garrett P. Lent

GPL/sll
Enclosures

Mathew L. Homsher, Secretary
April 2, 2026
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cc: The Honorable Erin L. Gannon (*w/enclosures; via email*)
The Honorable John Coogan (*w/enclosures; via email*)
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 E-MAIL

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John Zola
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Dated: April 2, 2026



Garrett P. Lent

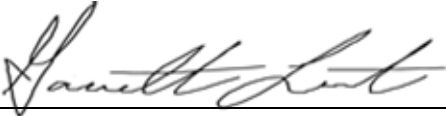
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of PPL Electric :
Utilities Corporation Filed Pursuant to 52 :
Pa. Code Chapter 57 Subchapter G, for :
Approval to Build Approximately 1.1 :
Miles of New Parallel Double Circuit 230 : Docket No. A-2025-3059443
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 :

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.101, YOU MAY FILE AN ANSWER TO THE ENCLOSED PRELIMINARY OBJECTION WITHIN TEN (10) DAYS OF THE DATE OF SERVICE HEREOF. YOUR ANSWER TO THE PRELIMINARY OBJECTION MUST BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL FOR PPL ELECTRIC UTILITIES CORPORATION.

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Date: April 2, 2026

Attorneys for PPL Electric Utilities Corporation

**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 :
Approval to Build Approximately 1.1 :
Miles of New Parallel Double Circuit 230 : A-2025-3059443
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 :

**PRELIMINARY OBJECTION OF
PPL ELECTRIC UTILITIES CORPORATION TO THE
PROTEST OF JOHN ZOLA**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) and hereby files this Preliminary Objection, pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code § 5.101, and respectfully requests that the Protest (“Protest”) filed by John Zola (“Protestant”) be summarily dismissed in its entirety and with prejudice because the Protest is legally insufficient and because the Protestant lacks standing.

In support thereof, PPL Electric states as follows:

I. BACKGROUND

1. PPL Electric is a “public utility” and an “electric distribution company” as those terms are defined under the Public Utility Code, 66 Pa. C.S. §§ 102 and 2803, subject to the regulatory jurisdiction of the Commission.

2. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services 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 19, 2025, PPL Electric filed a 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 on the New Tomhicken 230 kV Switchyard that are Respectively Located in Luzerne County, Pennsylvania (hereinafter, the “Letter of Notification”).

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

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

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

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

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

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

10. 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.

11. 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.

12. 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.

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

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

15. On March 16, PPL Electric and OCA filed their respective prehearing memoranda.

16. On March 18, 2026, a prehearing conference was held in the above-captioned matter.

17. On March 20, 2026, the Commission issued a Scheduling Order, setting forth the procedural schedule and addressing various other matters related to active parties, discovery, notice, etc., that arose during the prehearing conference. Relevant to this Preliminary Objection, the Scheduling Order directed Erika Cook and John Zola to inform the ALJs if they chose to participate as active parties to the proceeding.

18. On March 24, 2026, Erika Cook and John Zola informed the ALJs that they chose to participate as active parties to the proceeding.

19. Also on March 24, 2026, the Commission issued an In-Person Evidentiary Hearing Notice, setting the dates for in-person evidentiary hearings for September 17-18, 2026.

20. On March 26, 2026, the Commission issued a Prehearing Order, informing the parties that the list of active parties in the proceeding had been updated to include PPL Electric, OCA, Erika Cook, and John Zola.

21. Because the Protestant has determined to be an active party in this proceeding, PPL Electric herein files this Preliminary Objection to the Protest. For the reasons explained below, PPL Electric respectfully requests that the Commission summarily dismiss the Protest of John Zola because: (1) the Protest is legally insufficient because the Protestant failed to allege unlawful conduct by PPL Electric with respect to the location and siting of the new facilities that are the subject of the Letter of Notification (the “Project”) and (2) the Protestant lacks standing to participate in the proceeding.

II. STANDARD OF REVIEW

22. Pursuant to the Commission’s regulations, preliminary objections in response to a pleading may be filed on several grounds, including:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

52 Pa. Code § 5.101(a) (emphasis added).

23. In ruling on preliminary objections, the Presiding Officer must accept as true all well-pled allegations of material facts as well as all inferences reasonably deducible therefrom. *Stilp v. Cmwlth.*, 910 A.2d 775, 781 (Pa. Cmwlth. 2006) (citing *Dep't of Gen. Servs. v. Bd. of Claims*, 881 A.2d 14 (Pa. Cmwlth. 2005)). However, the Presiding Officer need not accept as true conclusions of law, unwarranted inferences from facts, argumentative allegations, or expressions of opinion. *Stanton-Negley Drug Co. v. Dep't of Pub. Welfare*, 927 A.2d 671, 673 (Pa. Cmwlth. 2007). Notwithstanding, any doubt must be resolved in favor of the non-moving party. *Stilp*, at 781.

24. In addition, the Presiding Officer must determine whether, based on the factual pleadings, recovery is possible. *See Rok v. Flaherty*, 527 A.2d 211, 214 (Pa. Cmwlth. 1987). Indeed, for preliminary objections to be sustained, it must appear with certainty that the law will permit no recovery. *See Stilp*, at 781; *Milliner v. Enck*, 709 A.2d 417, 418 (Pa. Super. 1998).

III. PRELIMINARY OBJECTIONS

A. PRELIMINARY OBJECTION NO. 1 – THE PROTEST IS LEGALLY INSUFFICIENT BECAUSE THE PROTESTANT FAILED TO STATE A LEGALLY SUFFICIENT BASIS UPON WHICH THE COMMISSION MAY GRANT RELIEF

25. PPL Electric incorporates by reference Paragraphs 1 through 25 as if fully set forth herein.

26. When a “Complaint fails to state a claim against the named respondent upon which the Commission may grant relief,” the Complaint is “insufficient as to substance,” and the “Respondent is entitled to judgment as a matter of law.” *Stabley v. Phila. Gas Works*, Docket No. F-2010-2186368, 2010 Pa. PUC LEXIS 231, at *6 (July 29, 2010) (Initial Decision), *adopted without modification*, (Order entered Oct. 1, 2010); *see Coggins v. UGI Cent. Penn Gas*

Inc., Docket No. C-2012-2312796, 2012 Pa. PUC LEXIS 1497 (Sept. 10, 2012) (Initial Decision), *adopted without modification*, (Order entered Nov. 9, 2012).

27. In the Protest, the Protestant states that they are “a landowner directly affected by the development project.” (Protest ¶ (a)(3).)

28. However, the Protestant is not a landowner located within the proposed right-of-way (“ROW”) for the Project, and the Protestant fails to establish facts as to how they would otherwise be directly affected by the Project.

29. Because the Protestant is not a landowner within the ROW, the Protest is legally insufficient in that the Project will not adversely affect the Protestant as a landowner.

30. The Commission would be unable to grant the Protestant relief with respect to the Protestant’s property, because the Project will not be located on the Protestant’s property, thus, the Protest is insufficient as to its substance.

31. Further, the Complainant states that the Letter of Notification “ties to a development project that was denied by Hazle Township BOS.” (Protest ¶ (a)(2).)

32. To the extent that the Protestant is alleging that a subsequent or different project that is not the subject of the instant Letter of Notification will adversely affect them as a landowner, the Protest is legally insufficient.

33. The subject of the instant Letter of Notification is the Project as described in Paragraph 3, *supra*. Any subsequent or different projects are not the subject of this Letter of Notification.

34. Thus, to the extent that the Protest concerns any subsequent projects, the Commission will be unable to grant the Protestant relief with respect to those projects because they are outside of the scope of the instant Letter of Notification.

35. Finally, to the extent that the relief sought by the Protestant is with respect to the siting and construction of the non-HV transmission line buildings or facilities of the interconnecting customer, the Protest is legally insufficient.

36. The siting and construction of the customer's non-HV transmission line building and associated facilities is outside the scope of the Commission's jurisdiction under 52 Pa. Code §§ 57.71-57.77, which pertains specifically to public utilities and HV transmission lines.

37. Therefore, the Commission cannot grant the Protestant relief with respect to customer-owned non-HV transmission line buildings or facilities where (a) the customer is not a public utility, and (b) the buildings or facilities that the customer is contesting are not an HV transmission line.

38. Therefore, for the reasons listed above, the Protest is legally insufficient with respect to the siting and location of the Project because it fails to state a claim upon which the Commission may grant relief.

39. Accordingly, the Protest should be dismissed in its entirety and with prejudice pursuant to 52 Pa. Code § 5.101(a)(4).

B. PRELIMINARY OBJECTION NO. 2 – THE PROTEST IS LEGALLY INSUFFICIENT BECAUSE THE PROTESTANT LACKS STANDING TO FILE A PROTEST TO THE LETTER OF NOTIFICATION

40. PPL Electric incorporates by reference Paragraphs 1 through 39 as though fully set forth herein.

41. The Protest should be dismissed because the Protestant's property is not traversed by the proposed Project, and the Protestant's only interest is highly attenuated. Therefore, the Protestant lacks standing to file a Protest in the above-captioned proceeding.

42. Under Pennsylvania law, "[i]n seeking judicial resolution of a controversy, a party must establish as a threshold matter that he has standing to maintain the action." *Stilp v.*

Commonwealth, 940 A.2d 1227, 1233 (Pa. 2007). “[T]he core concept of standing is that a person who is not adversely affected in any way by the matter he seeks to challenge is not aggrieved thereby and has no standing to obtain a judicial resolution of his challenge.” *Fumo v. City of Phila.*, 972 A.2d 487, 496 (Pa. 2009) (citing *Wm. Penn Parking Garage, Inc. v. City of Pittsburgh*, 346 A.2d 269, 280-81 (Pa. 1975)).

43. To have standing, a party must establish that its interest is substantial, direct, and immediate. See *Del-Aware Unlimited. v. Commonwealth*, 551 A.2d 1117, 1121 (Pa. Cmwlth. 1988) (citation omitted); *1000 Grandview Ass’n v. Mt. Washington Assocs.*, 434 A.2d 796, 797 (Pa. Super. 1981) (citation omitted); see also *George v. Pa. PUC*, 735 A.2d 1282, 1286 (Pa. Cmwlth. Ct. 1999) (explaining that the three requirements for a party to have standing are: (1) the party must have a substantial interest in the subject matter of the litigation; (2) the interest must be direct; and (3) the interest must be immediate and not a remote consequence).

44. The Pennsylvania Commonwealth Court elaborated on each of the three requirements for standing as follows:

A 'substantial' interest is an interest in the outcome of the litigation which surpasses the common interest of all citizens in procuring obedience to the law. A 'direct' interest requires a showing that the matter complained of caused harm to the party's interest. An 'immediate' interest involves the nature of the causal connection between the action complained of and the injury to the party challenging it and is shown where the interest the party seeks to protect is within the zone of interests sought to be protected by the statute or the constitutional guarantee in question. Both the immediacy and directness requirements primarily depend upon the causal relationship between the claimed injury and the action in question.

George v. Pa. PUC, 735 A.2d 1282, 1286 (Pa. Cmwlth. Ct. 1999) (citations omitted).

45. Further, the Commission has sustained preliminary objections where the Protestant presents mere “unsupported speculation and a general concern regarding the community but makes

no particular allegations of direct effects upon Protestant if the Application is granted.” *Application of Artesian Water Pennsylvania, Inc., for approval to begin to offer, render, furnish, or supply water service to the public in additional territory in portions of New Garden Township, Chester County, Pennsylvania*, 2015 Pa. PUC LEXIS 195*, *12 Docket No. A-2014-2451241 (April 29, 2015).

46. As an initial matter, the Protestant failed to allege an injury that is substantial.

47. The Protestant avers that the “application ties to a development project that was denied by Hazle Township BOS,” that PPL Electric “has stated publicly ratepayers will bear the burden of cost for the project,” and that the “[p]ublic was not properly notified of [the] application.” (Protest, ¶ (a)(2).)

48. None of these averments are sufficient to establish that the Protest is substantial in that it surpasses the common interest of all others in procuring obedience to the law.

49. The first averment is on behalf of Hazle Township. The Protestant has failed to establish the manner in which they are fit to act as a representative of Hazle Township and its interests. Moreover, an interest in an injury to Hazle Township is not direct nor is it immediate to the Protestant, who did not file the Protest acting as representatives of Hazle Township.

50. The second averment, being related to ratepayers, fails to establish the manner in which the Protestant will bear an injury that is more substantial in than the common interests of all others. Importantly, OCA is actively participating in this proceeding and representing the interests of residential ratepayers, like the Protestant.

51. The Protest further asserts an interest in this matter related to PPL Electric’s notice the general public. (Protest ¶ (a)(2).) However, this appears to be based upon the fact that the

Protestant does not own property that will be traversed by the Project, and, therefore, need not be served with notice of the project by certified mail.

52. Finally, the Protestant merely avers that the Project will “directly affect [them] as [property owners] along the proposed line, and that they are a property owner “directly affected by the development project.” (Protests, ¶¶ (a)(1), (a)(3).)

53. However, the Protestant fails to establish the manner in which the Project will cause them direct or immediate harm, seeing as they are not a landowner of property that will be traversed by the Project.

54. Indeed, the Protestant fails to provide any facts whatsoever regarding the injury that will result to them from the Commission’s approval of the Letter of Notification. The Protestant has presented unsupported speculation and general concerns, but have made no allegations of the direct or immediate effects that the granting of the Letter of Notification will specifically have on them.

55. Therefore, the Protestant has no interest, let alone a substantial, direct, and immediate interest necessary to confer standing to bring the Protest about the Letter of Notification.

IV. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the above-captioned Protest filed by John Zola be dismissed in its entirety pursuant 52 Pa. Code § 5.101(a)(4) and (a)(7).

Respectfully submitted,



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Attorneys for PPL Electric Utilities Corporation