

April 6, 2026

Via Electronic Mail Only

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 with the Pennsylvania Public Utility Commission is the Answer of Erika Cook to the Preliminary Objection of PPL Electric Utilities Corporation ("PPL Electric") to the Protest of Erika Cook in the above-referenced matter.

Thank you for your time and attention regarding my filing. If you have any questions, please kindly reach out to me.

Respectfully,



Erika Cook
38 Red Rock Road
Sugarloaf, PA 18249
elcook33@gmail.com
570-233-8205

Docket No. A-2025-3059443

Enclosures

Matthew L. Homsher, Secretary

April 6, 2026

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 I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Answer of Erika Cook to the Preliminary Objection of PPL Electric Utilities Corporation ("PPL Electric") to the Protest of Erika Cook, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 5.101 (relating to preliminary objections), in the manner and upon the persons listed below.

Dated this 6th day of April 2026.

VIA E-MAIL

Jacob Guthrie (JGuthrie@paoca.org)

Josiah B. Harmar (JHarmar@paoca.org)

PA Office of Consumer Advocate

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April 6, 2026

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 kV Transmission Taps that are Needed	:	A-2025-3059443
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	:	

Answer of Erika Cook to the Preliminary Objection

Pursuant to 52 Pa. Code § 5.101, I, Erika Cook, submit these Answers of Erika Cook to the Preliminary Objection filed by PPL Electric Utilities Corporation (“PPL Electric”). PPL Electric asks the Commission to dismiss my protest for lack of standing. When the correct Pennsylvania legal standards are applied, I clearly meet the requirements for standing, and my protest should proceed.

I. Background

Question 1. Admitted in part, denied in part. I, Erika Cook, admit that PPL Electric filed a Letter of Notification. PPL Electric’s Letter of Notification is a written document that speaks for itself, and I, Erika Cook, deny all averments in paragraph 1. of PPL Electric’s Preliminary Objections that are different from or otherwise inconsistent with PPL Electric’s Letter of Notification.

Questions 2-20. Admitted.

Question 21. Denied. (1) The Project Property Owner, NP Hazleton Holdings 1 LLC is currently involved in a land use appeal that is in active litigation. Pennsylvania courts have repeatedly emphasized the importance of coordinated and orderly land-use planning. (2) PPL Electric argues that I do not have standing to participate but I am a PPL Electric rate payer that will be bearing the burden of a portion of the Project Cost.

II. Standard of Review

Question 22. (4) **Legal insufficiency of a pleading.** Denied. Under 52 Pa. Code §§ 57.72 (14) the application must include a statement identifying litigation concluded or in progress which concerns property or matter relating to the proposed HV line, right-of-way route or environmental matters. This is not included in the Application.

(7) **Standing of a party to participate in the proceeding.** Denied. According to the Letter of Notification (LON) page 11, “Based on a review of the proposed system improvements derived from this Project, it was determined that PPL Electric is responsible for approximately \$38.4 Million (~64% of the total Project costs) and the Customer is responsible for approximately \$21.8 Million (~36% of the total Project costs).” As a PPL Electric rate payer, I will be directly affected by bearing the burden of PPL Electric’s portion of the Project cost responsibility along with every other PPL Electric rate payer. The Office of Consumer Advocate (OCA) also argues this in their Protest to the Application, page 4, ¶ 9.

Question 23. Denied. Under [Application of] Biester, [487 Pa. 438, 409 A.2d 848 (1979)], a taxpayer has standing to challenge an act if: ...(5) no other persons are better suited to assert the claim. As this was not advertised to the general public in the local publication, there is no other rate payer who is better suited than myself to assert this Protest on behalf of rate payers.

Question 24. Denied. Under 52 Pa. Code §§ 57.72 (14) the application must include a statement identifying litigation concluded or in progress which concerns property or matter relating to the proposed HV line, right-of-way route or environmental matters. See Answer to Numbers 31 - 39 below for case law citing why the land use conflict appeal should be decided before any project associated with NP Hazleton Holdings 1 LLC proceeds.

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

Question 25. I, Erika Cook, repeat and re-allege my answers to paragraphs 1 through 24 as if fully set forth herein.

Question 26. Denied. The cases of *Stabley v. Phila. Gas Works*, Docket No. F-2010-2186368 and *Coggins v. UGI Cent. Penn Gas Inc.*, Docket No. C-2012-2312796 are irrelevant to this case. The orders were issued to grant the preliminary objection because it was determined in both cases that the utility company in question did not service the Complainants and also the Complainants did not respond. PPL Electric is my electric utility provider and I have responded accordingly.

Questions 27 - 30. Denied. As PPL Electric has explained multiple times in the Letter of Notification (LON), there will be two phases to this Project. The proposed project (Phase 1) and subsequent transmission line(s) (Phase II) that will follow, will directly affect me as I am a rate payer that will be affected by Phase I of the Project and property owner along the proposed Phase II transmission line. If Phase II was not a relevant part of this Project in some fashion, why was it identified by PPL Electric in the LON? This gives me a unique standing as a Protestant.

Questions 31 - 39. Denied. Under 52 Pa. Code §§ 57.72 (14) the application must include a statement identifying litigation concluded or in progress which concerns property or matter relating to the proposed HV line, right-of-way route or environmental matters. The Customer for the Project is currently in a land use conflict appeal with Hazle Township Board of Supervisors (BOS). According to Exhibit 1, Figure 3-1 Aerial Map, the Property Owner for the Proposed Customer Substation is NP Hazleton Holdings 1 LLC. To imply that the Project identified in this Application as Phase I is NOT related to the current appeal case in litigation is incorrect. This switchyard and substation are mentioned multiple times in Project Hazelnut plans. The Hazle Township BOS denied NP Hazleton Holdings 1 LLC's development plan on November 14, 2025. NP Hazleton Holdings 1 LLC filed an appeal on this decision on December 12, 2025. The case is currently in court with approximately 100 resident intervenors from the Hazle Township and surrounding areas. The petitioners were granted their request on March 2, 2026 and the case is still in active litigation.

Pennsylvania courts have repeatedly emphasized the importance of coordinated and orderly land-use planning, approval of the transmission line at this stage would be premature and inconsistent with legal precedent related to these two cases:

1. *El Rancho Grande, Inc. v. Pa. PUC*, 496 A.2d 86, 90 (Pennsylvania Commonwealth 1985 - PUC must consider local land-use impacts.

2. South Coventry Twp. v. Pa. PUC, 504 A.2d 368, 372 (Pennsylvania Commonwealth 1986 - PUC should avoid actions that conflict with municipal processes.

The Application appears inconsistent with existing municipal planning, zoning, and infrastructure approvals, and may conflict with ongoing regulatory reviews. If the appeal is denied, there will be no need for this 1.1 mile transmission line, switchyard or substation.

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

Question 40. I, Erika Cook, repeat and re-allege my answers to paragraphs 1 through 39 as if fully set forth herein.

Questions 41 - 42. Denied. The term public is not limited to customers or residents inside a service map or right of way. It includes any person whose property or environment may be affected.

Questions 43 - 46. Denied. The Applicant has not demonstrated that the proposed expansion meets the statutory requirement of public convenience and necessity under 66 Pa.C.S. §1102. The need is also questioned for multiple reasons by OCA in their Protest to the Application, Page 4. The record lacks sufficient information on environmental impacts, power grid reliability, and fire-protection impacts, including potential strain on existing power sources. I will be substantially, directly, and immediately affected by any strain placed on the existing power grid. Pennsylvania Law Supporting My Standing:

A. Article I, Section 27 of the Pennsylvania Constitution (Environmental Rights Amendment):

§ 27. Natural resources and the public estate. The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people.

(May 18, 1971, P.L.769, J.R.3)

The Pennsylvania Supreme Court has held that these rights are individual, enforceable rights, not abstract policy statements (Robinson Township v. Commonwealth, 83 A.3d 901 (Pa. 2013)).

B. Pennsylvania Public Utility Code:

The Public Utility Code recognizes that persons affected by utility actions have the right to participate:

- 66 Pa. C.S. § 701 - Any person “complaining of anything done or omitted to be done by a public utility” may file a complaint.
- 66 Pa. C.S. § 1103(a) - The Commission must determine whether a proposed expansion is “necessary or proper for the service, accommodation, convenience, or safety of the public”.

Question 47. Admitted.

Question 48. Denied. Under 52 Pa. Code §§ 57.72 (14) the application must include a statement identifying litigation concluded or in progress which concerns property or matter relating to the proposed HV line, right-of-way route or environmental matters. The Customer for the Project is currently in a land use conflict appeal with Hazle Township Board of Supervisors (BOS). According to Exhibit 1, Figure 3-1 Aerial Map, the Property Owner for the Proposed Customer Substation is NP Hazleton Holdings 1 LLC.

Question 49. Denied. I did not at any point insinuate or act as a representative of Hazle Township.

Question 50. Admitted in part, Denied in part. Admitted that OCA is actively participating in this proceeding and representing the interests of residential ratepayers. Denied that this reason alone should allow my Protest to be denied when I have established unique reasons why I should be allowed to be an active Protestant to this case.

Question 51. Denied. The Applicant only advertised this application in the Wilkes Barre Citizens’ Voice and Wilkes Barre Times Leader per their own evidence submitted, which are not the primary publications for Hazle Township or Sugarloaf Township. Residents were not properly notified of this application, especially one of this scale which is part of the reason why I, as a fellow rate payer, entered a Protest to this Application. All residents have a right to be made publicly aware of a high voltage transmission line project, not just those along the proposed project property line.

Questions 52 - 53. Denied. As PPL Electric has explained multiple times in the Letter of Notification (LON), there will be two phases to this Project. The proposed project (Phase 1) and subsequent transmission line(s) (Phase II) that will follow, will directly affect me as I am a rate payer that will be affected by Phase I of the Project and property owner along the proposed Phase II transmission line.

Questions 54 - 55. Denied. This Project will affect my family's everyday life as well as the lives of my neighbors. It could affect our power service reliability, as mentioned in OCA's Protest to the Application, page 5, paragraph 14. It will cause destruction to land and wildlife, and disrupt public safety in my community. All while we, the rate payers, will be bearing the majority of the cost for the destruction and disruption we would be forced to endure.

IV. Conclusion

For all the reasons mentioned above, I respectfully request that the Commission:

- Deny PPL Electric's Preliminary Objection; and
- Allow my Protest to proceed to discovery and hearing; and
- Grant any other relief the Commission deems appropriate.

Respectfully,

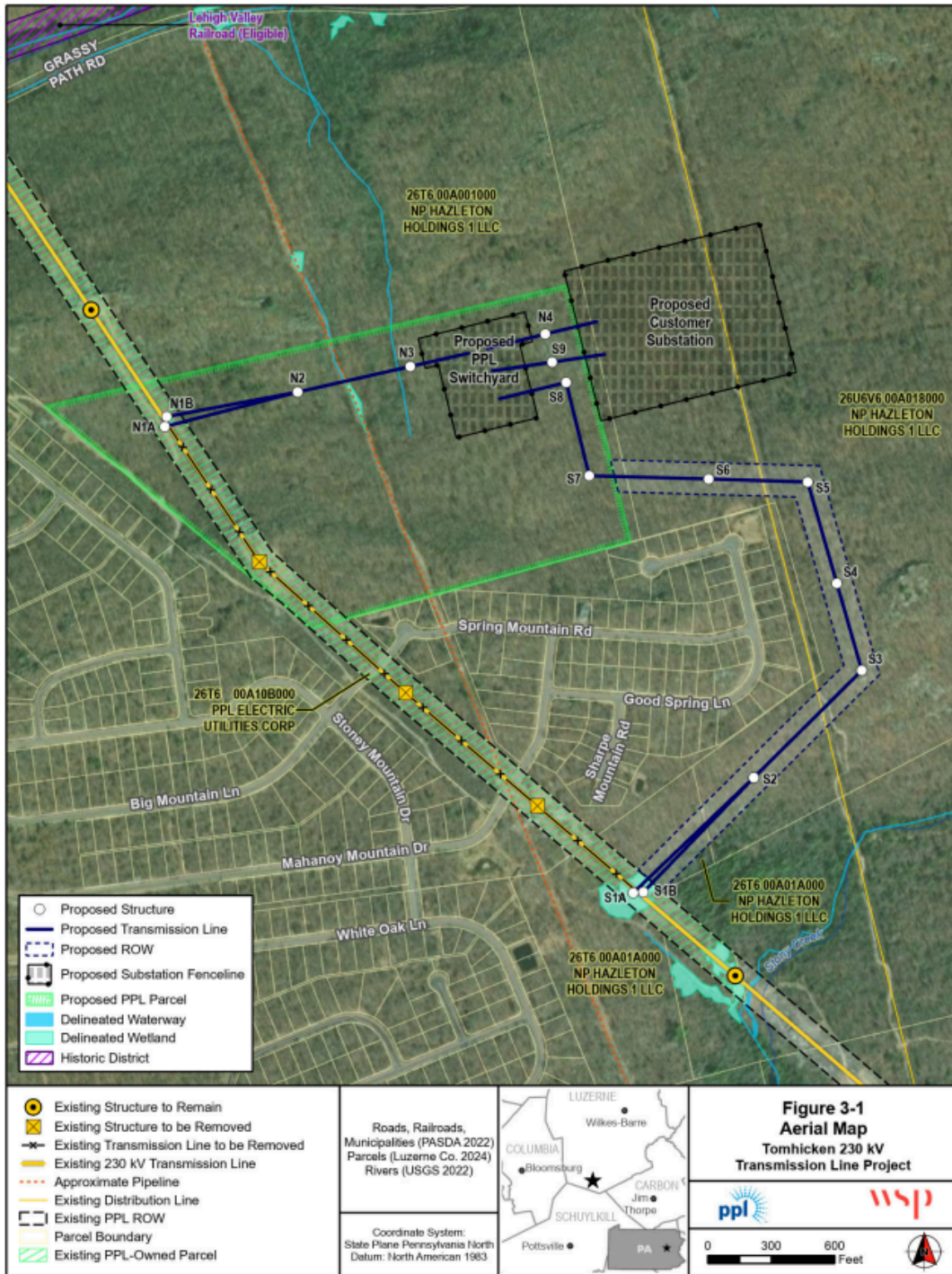


Erika Cook

Pro Se Protestant

Exhibit 1

Figure 3-1 Aerial Map



VERIFICATION

I, Erika Cook, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect 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: April 6, 2026



Erika Cook, Pro Se Protestant