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File #: 209803

April 21, 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 Answer of PPL Electric Utilities Corporation (“PPL Electric”) to the Motion to Dismiss Objections and to Compel Answers to Interrogatories of the Office of Consumer Advocate in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

  
Hayley E. Wilburn

HW/bfc  
Attachment

Matthew Homsher, Secretary  
April 21, 2026  
Page 2

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

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 57.72(d)(3).

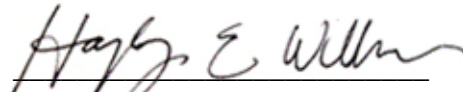
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Dated: April 21, 2026

  
\_\_\_\_\_  
Hayley E. Wilburn

**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 : Docket Nos. 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 :

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**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO THE MOTION TO  
COMPEL OF THE OFFICE OF CONSUMER ADVOCATE**

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

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Answer, pursuant to Section 5.342 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.342, to the Motion to Dismiss Objections and to Compel Answers to Interrogatories (“Motion” or “OCA Motion”) of the Office of Consumer Advocate (“OCA”). As explained below, the Motion should be denied because PPL Electric properly objected to many of the Interrogatories in Sets I and II, and PPL Electric provided Answers to several of the Interrogatories included in the OCA Motion.

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” or “LON”).

4. On December 30, 2025, OCA filed a Notice of Intervention and Public Statement.

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

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

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

8. On March 27, 2026, OCA propounded certain discovery, including specifically OCA Set I, Nos. 2(b), 5(b), and 5(d), and OCA Set II, Nos. 12-13, 15, 21-22, and 24. These discovery requests sought the following information:

### **OCA Set I:**

2: Refer to the LON, page 2, “The Customer will construct, own, operate, and maintain their 230-34 kV substation.”

...

b. Please identify any other Customers who currently own substations interconnected with PPL Electric's system, and explain whether PPL Electric's tariff or interconnection agreements treat customer-owned substations differently from utility-owned substations with respect to cost responsibility for upstream transmission facilities.

...

5: Please refer to the Letter of Notification (LON) page 7, "The prospective Customer is requesting 230 kV electrical service with an in-service date of December 15, 2026 and an initial load of 240 MW."

...

b. Please provide all non-privileged written communications, meeting notes, emails, interconnection requests, and other documents exchanged between PPL Electric and the Customer regarding the Customer's request for 230 kV electrical service, including any documents in which the Customer stated its reasons for requesting service at 230 kV rather than a lower voltage level.

...

d. Please identify any other instance in PPL Electric's history where a Customer has requested new electrical service at 230 kV, and for each instance state the Customer's initial load MW, the in-service date, and whether the associated transmission infrastructure costs were allocated to the Customer, to ratepayers, or shared, and in what proportion.

**OCA Set II:**

12: How much load does PPL currently have in its large load interconnection pipeline?

a. Please provide further qualification regarding whether this amount is subject to a contract with PPL, such as an Electric Service Agreement or Letter of Authorization, or is otherwise included in PPL's pipeline.

b. Please identify how many potential interconnection customers have at least 50 megawatts of load at a single point of interconnection.

c. Please identify the load of the potential interconnection customers which have at least 50 megawatts of load at a single point of interconnection.

d. Please identify how many potential interconnection customers have at least 75 megawatts of load at multiple points of interconnection within a 10-mile radius.

e. Please identify the load of the potential interconnection customers which have at least 75 megawatts of load at multiple points of interconnection within a 10-mile radius.

13: Please provide a projection as to the cumulative impact of the interconnection of large load customers on PPL's FERC transmission formula rate each year for the next five years, based on PPL's projected additions to rate base associated with PPL's planned construction of interconnection facilities and planned load ramp across PPL's footprint. Please provide the analysis in live, Excel format with links intact.

...

15: Are there any pending legal proceedings regarding the development of the interconnecting Customer's property, such as zoning, permitting, or other, similar matters? If yes, please provide the docket number of the proceeding and court or administrative tribunal before which the proceeding has been initiated.

...

21: Provide the number of customers, by class, served by PPL in each of Luzerne, Carbon, and Schuylkill Counties.

22: Provide the number of customers, by class, served by PPL in each of Nescopeck, Black Creek, Sugarloaf, and Hazle Townships in Luzerne County, separately identified.

...

24: Please describe PPL's procedures to require all electric generation suppliers to deliver energy to PPL at locations and in amounts which are adequate to meet the energy supplier's obligations to its customers.

9. On April 6, 2026, PPL Electric filed objections to the above-listed interrogatories (“Objections”). The Objections to the March 27, 2026 Interrogatories are attached hereto as **Appendix A**.

10. After the submission of the Objections, counsel for PPL Electric and counsel for OCA conferred via e-mail and conference call regarding the Objections, but were unable to reach a resolution of this dispute.

11. On April 16, 2026, OCA served its Motion on the active parties.

12. Also on April 16, 2026, PPL Electric served responses to the Sets I and II interrogatories of OCA to which it did not file Objections, as well as to some to which it did object.

13. On April 17, 2026, PPL Electric served responses to four more Set II interrogatories, to which it had not previously objected.

14. PPL Electric hereby files this Answer to the Motion.

## **II. ANSWER TO THE MOTION TO COMPEL**

15. As an initial matter, PPL Electric notes that, in addition to serving responses to all interrogatories that it did not object to, it also served responses to OCA Set I, No. 2(b), and to OCA Set II, Nos. 15, 21, 22, and 24. As such, to the extent that OCA’s Motion concerns these interrogatories, and the discoverability of the information sought by these interrogatories, the Motion is now moot.<sup>1</sup> To the extent that OCA elects to continue to pursue its Motion to Compel

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<sup>1</sup> PPL Electric reserves all rights to object to the admissibility of certain information sought by the Set I and II Discovery at an evidentiary hearing to be held in this matter.

with respect to these requests, PPL Electric reserves its right to answer the OCA Motion or any update or amendment thereto in light of the Company's responses to these discovery requests.

16. However, PPL Electric does maintain its Objections to OCA Set I, Nos. 5(b) and 5(d) and to OCA Set II, Nos. 12 and 13, and has not provided answers to these requests.

17. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Relevance depends upon the nature and the facts of the individual case. *Koken v. One Beacon Ins. Co.*, 911 A.2d 1021, 1025 (Pa. Cmwlth. 2006).

18. As noted by the Superior Court of Pennsylvania, "While discovery should be liberally allowed, 'fishing expeditions' are not to be countenanced under the guise of discovery." *Land v. State Farm Mutual Ins. Co.*, 600 A.2d 605, 608 (Pa. Super. 1991).

19. "[T]he standard for discovery is relevance, not curiosity." *Pa. PUC v. Pennsylvania-American Water Co.*, Docket Nos. R-2011-2232243, et al., at 22 (July 21, 2011) (Order on Motion to Compel).

20. Importantly, the scope of this proceeding is limited to the Commission's review and determination of whether to authorize PPL Electric to site and construct a specific proposed HV line. 52 Pa. Code §§ 57.71, 57.72(d)(1)(iii) and (vi), 57.75(e), and 57.76(a) (describing the Commission's requirements, review, and determinations to be made with respect to a "proposed HV transmission line" or a "proposed HV line").

21. While OCA attempts to broadly construe the Commission's determination of "need" under 52 Pa. Code §§ 57.76(e)(1) and 57.76(a)(1), OCA ignores that this determination is with respect to the specific facilities or project proposed (i.e., the "proposed HV line" or "proposed HV transmission line"). Indeed, the Commission previously rejected similar arguments by OCA

in a litigated letter of notification proceeding where OCA argued “need should be viewed in a broad context instead of only analyzing need narrowly.” See *Letter of Notification of PPL Electric Utilities Corporation Filed pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval to Rebuild the Existing Double-Circuit Stanton-Summit #3 and #4 230 kV Transmission Lines Connecting the Stanton 230-69 kV Substation and a Two-Pole Turn Structure That Are Respectively Located in Luzerne and Lackawanna Counties, Pennsylvania*, Docket No. A-2022-3037375 (Opinion and Order entered June 13, 2024), at pp. 12-13 (describing OCA’s exception that argued “need should be viewed in a broad context”) and 17-18 (rejecting OCA’s exceptions because, *inter alia*, “PPL Electric demonstrated that there is a need for the [p]roject” (emphasis added)).<sup>2</sup>

22. Moreover, the case law cited by the OCA does not support its position that projects or facilities that are not the subject of this Letter of Notification are relevant to the Commission’s review of the specific Project and facilities that are the subject of this Letter of Notification. OCA Motion ¶ 22. *Hess* held that a utility is not required to show a project is “absolutely necessary” in order to demonstrate need. *Hess v. Pa. PUC*, 107 A.3d 246, 262 (Pa. Cmwlth. 2014). And, the cited portions of *Energy Conservation Council* (1) rejected an attempt to “graft language contained in Section 57.76(a)(4), which includes the phrase ‘minimum adverse environmental impact,’ onto Section 57.76(a)(1),” *Energy Conservation Council of Pa. v. Pa. PUC*, 995 A.2d 465, 483-484 (Pa. Cmwlth. 2010), and (2) concluding that the Commission’s order in the proceeding below was supported by substantial evidence when it rejected non-transmission line alternatives offered by

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<sup>2</sup> Available at: <https://www.puc.pa.gov/pcdocs/1833738.pdf>.

an intervenor, *id.* at 486. In each of these cases, the appellate court’s determinations upon need remained limited to the facilities at issue and whether there is a need for those specific facilities.

23. Furthermore, PPL Electric notes that OCA’s Motion concedes the relevant scope of this proceeding: “the project, as proposed” (OCA Motion ¶¶ 22, 23), “the proposed transmission line” (OCA Motion ¶ 22 (citing *Energy Conservation Council*)), and “the Project – as proposed . . .” (OCA Motion ¶ 26). Review of the specific project proposed in this matter does not authorize “fishing expeditions” or inquiries based upon “curiosity” into matters outside the scope of the facts and circumstances of the specific Project at issue.

24. PPL Electric objected to OCA Set I, Nos. 5(b) and 5(d) as overly broad, unduly burdensome, and seeking information that is not likely to lead to the discovery of admissible evidence. The OCA Motion should be denied with respect to OCA Set I, No. 5(b) and 5(d), and PPL Electric’s Objections should be sustained.

25. Specific to Set I, No. 5(b), OCA asserts in its motion that the “documents requested in this interrogatory are necessary for the OCA’s retained expert witness to determine, on an independent basis, whether PPL has sufficiently established need for the Project.” OCA Motion ¶ 35. This assertion is incorrect. The Project at issue is the result of a customer submitting an interconnection request, and following PPL Electric’s policies and procedures for interconnection. PPL Electric acknowledges that documents related to the interconnection request within the possession and control of individuals responsible for the review of this request would be an appropriately limited scope of information sought. However, the request is not tailored in this matter; it instead seeks “all non-privileged written communications, meeting notes, emails, interconnection requests, and other documents exchanged.” This request clearly constitutes a

“catch-all” discovery request, which lacks sufficient specificity as to the information sought and lacks reasonable limitations in the subject matter sought.

26. The Motion further fails to demonstrate that the request is not overly broad and would not impose unreasonable burden for PPL Electric to answer. Indeed, the request for “all non-privileged written communications, meeting notes, emails, interconnection requests, and other documents exchanged” would require PPL Electric to conduct substantial electronic and hard file discovery, with a yet unknown number of custodians (or possible custodians) of documents and information within the scope of this request. Based upon a preliminary review, PPL Electric anticipates that such discovery will involve approximately 10 custodians, some of which have left the Company, and the compilation and review of a yet undetermined number of pages of documentation (both for relevance and privilege) to respond to a request that, at its core, seeks information to review the interconnection request made for this Project, and PPL Electric’s review and grant of this request. It is clear that answering this request would impose an unreasonable burden upon PPL Electric.

27. The Motion should also be denied with respect to OCA Set I, No. 5(d). The information sought by Set I, No. 5(d) is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Ch. 57, Subch. G of the Commission’s regulations relates to the Commission’s review and approval of a “proposed HV transmission” or “proposed HV line.” *See, e.g.*, 52 Pa. Code § 57.76(a) (“The Commission will not grant the application, either as proposed or as modified, unless it finds and determines as to the proposed HV line: . . .”). Indeed, it is specifically seeking information regarding other PPL Electric customers that are not the customer to be interconnected with the Company’s system by this Project. Thus, it is seeking information that is not relevant to the specific facts and circumstances involved in this case.

28. Set I, No. 5(d) is also insufficiently limited in scope, and the information requested would certainly lead to a burdensome and wasteful production of irrelevant, inadmissible evidence. The plain language of this request seeks “any other instance in PPL Electric’s history where a Customer has requested new electrical service at 230 kV.” This request is not limited temporally or to subject matter relevant to this proceeding; it seeks information related to any (i.e., every) other request for 230 kV electric service in PPL Electric’s history. While OCA attempts to argue that this scope is limited by the specific provisions of PPL Electric’s tariff that govern service at 230 kV, the request does not distinguish between the provisions of the tariff effective at the time the Customer that is the subject of the LON sought 230 kV service and any previously effective versions of that tariff provision. It also does not take into account changes in PPL Electric’s history and operations, as well as changes in applicable law, that may have occurred throughout “PPL Electric’s history.”

29. Finally, while OCA claims that a 10-year history would be an appropriate limitation,” PPL Electric submits that this would only mitigate the burdensomeness of this request. OCA Motion ¶ 44. It still fails to resolve the primary issue of relevance, because the request still seeks information entirely unrelated to the Project and facilities at issue in this case.

30. PPL Electric also objected to OCA Set II, Nos. 12 and 13 as overly broad and seeking information that is irrelevant and not likely to lead to the discovery of admissible evidence. The OCA Motion should be denied with respect to OCA Set II, Nos. 12 and 13, and PPL Electric’s objections should be sustained.

31. OCA Set II, No. 12 seeks information regarding the Company’s “large load interconnection pipeline,” which seeks information about other “large load interconnections” that are not the subject of this proceeding and, therefore, have no relevance to it. Indeed, the LON

concerns the construction of one switchyard, specific tap lines, and specific connecting lines necessary to interconnect a specific customer. Information as to other large load interconnections not subject to this Letter of Notification is outside the scope of the Letter of Notification and cannot be reasonably calculated to lead to the discovery of admissible evidence.

32. OCA's attempt to focus upon "load growth in the Hazleton area" described in the Letter of Notification is flawed. OCA Motion ¶¶ 48. Load growth in the Hazleton area does not include the entirety of the Company's "large load interconnection pipeline. Similarly, OCA attempts to read the Letter of Notification's discussion of how this specific Project will impact transmission rates out of context. OCA Motion ¶¶ 47, 49. Indeed, the cited paragraphs of the Letter of Notification and the Necessity Statement both focus upon the impacts of this specific Project on transmission rates. See OCA Motion ¶¶ 47 (quoting Letter of Notification paragraph 11, which states "The Project would further that interest and result in lower rates for other of PPL Electric's transmission level customers." (emphasis added)). The impacts of the entire "large load interconnection pipeline" targeted by OCA Set II, No. 12, on transmission rates is different from, and irrelevant to, the issue of the impacts of the Project that is the subject of this proceeding on transmission rates.

33. The OCA Motion should be denied, and PPL Electric's Objections should be sustained, with respect to OCA Set II, No. 13 for similar reasons. PPL Electric incorporates by reference Paragraphs 31-32 of this Answer as if fully stated herein. In addition, OCA's attempt to rely upon *Application of Pa.-American Water Co. to acquire the wastewater assets of the Borough of Brentwood pursuant to Sections 1102, 1103, and 1329 of the Public Utility Code*, Docket No. A-2021-3024058 (Order entered Feb. 22, 2024) is misguided. That case involves the Commission's review and approval of the acquisition of wastewater asserts under 66 Pa.C.S.

§§ 1102, 1103, and 1329. These statutory provisions have zero applicability to this proceeding. This is a Letter of Notification for approval to site and construction specific HV transmission line facilities; it is not an application for approval of the acquisition of wastewater assets and a determination of the ratemaking rate base for those assets.<sup>3</sup> Similarly, *Pike Cnty. Light & Power Co. v. Pa. PUC*, 465 A.2d 735, 738 (Pa. Cmwlth. 1983) involved a review of purchased power costs by a utility, and the scope of the Commission’s jurisdiction over the utility’s purchase of power at wholesale costs; it did not involve review of the costs associated with the construction of an HV transmission line.

34. Furthermore, OCA’s Motion concedes that the appropriate scope of review regarding costs is limited to the costs associated with the specific Project at issue. OCA Motion ¶¶ 56 (stating “the facilities approved for construction in this matter will be included in PPL’s transmission rate base. . .”, and “The ultimate cost to consumers for the Project . . .”). PPL Electric acknowledges that cost information associated with the Project at issue is relevant and within the scope of this proceeding. However, analysis of the costs of this Project and its impact on transmission rates does not authorize a “fishing expedition” into cost impacts associated with other large load interconnection on PPL Electric’s transmission rates.

35. For the reasons more fully explained herein, the Company maintains its Objections to OCA Set I, Nos. 5(b) and 5(d) and to OCA Set II, Nos. 12 and 13 as these requests are overly broad, unduly burdensome, seeking information that is irrelevant, and is not reasonably calculated

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<sup>3</sup> PPL Electric further notes that, unlike a Section 1329 proceeding, there is no determination as to the specific ratemaking rate base value for the HV transmission line at issue in proceedings under Ch. 57, Subch. G of the Commission’s regulations. Ultimately, as OCA acknowledges, the determination of the ratemaking rate base value electric transmission facilities and the recoverability of such costs is within the exclusive jurisdiction of the Federal Energy Regulatory Commission (“FERC”). OCA Motion ¶ 56.

to lead to the discovery of admissible evidence. PPL Electric submits for the reasons explained above, as well as in its Objections, that its Objections should be sustained and the OCA Motion should be denied.

**III. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judges John M. Coogan and Erin L. Gannon deny the Motion to Compel of the Office of Consumer Advocate dated April 16, 2026.

Respectfully submitted,



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Date: April 21, 2026

Attorneys for PPL Electric Utilities Corporation

## **Appendix A**

**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 : 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 :

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**OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION TO THE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF THE  
OFFICE OF CONSUMER ADVOCATE SET NOS. I AND II**

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Pursuant to 52 Pa. Code §§ 5.342(c) and 5.349(d), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), by and through its attorneys, hereby serves these objections to the first and second sets of interrogatories (“Interrogatories”) of the Office of Consumer Advocate (“OCA”) served on March 27, 2026 (“OCA Set I” and “OCA Set II”, respectively).

As explained below, PPL Electric objects to OCA Set I, Interrogatories Nos. 2.b, 5.b, and 5.d and to OCA Set II, Interrogatories Nos. 12-13, 15, 21-22, and 24 on the grounds that they are overly broad, would be unreasonably burdensome to answer, and/or seek information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

In support, PPL Electric states as follows:

**I. OBJECTIONS**

**A. GENERAL OBJECTION**

1. As a general matter, PPL Electric notes that the scope of this proceeding is limited to a review of PPL Electric’s above-captioned Letter of Notification (“LON”), wherein the

Company proposes to site and construct 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 & #2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard, including 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 “Project”) under 52 Pa. Code Ch. 57, Subch. G.

2. Other PPL Electric facilities (whether they are existing facilities or proposed facilities) are not within the scope of this case.

3. Similarly, this matter does not involve transmission revenue requirement or rate determinations within the jurisdiction of the Federal Energy Regulatory Commission (“FERC”).

4. Therefore, discovery targeting information that is not within the scope of the Project that is the subject of this LON is overly broad, and seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

**B. OBJECTIONS TO OCA SET I, INTERROGATORIES NOS. 2.B, 5.B, AND 5.D AND TO OCA SET II, INTERROGATORIES NOS. 12-13, 15, 21-22, AND 24**

1. OCA Set I, Interrogatories Nos. 2.b, 5.b, and 5.d request the following:

...

2: Refer to the LON, page 2, “The Customer will construct, own, operate, and maintain their 230-34 kV substation.”

...

b. Please identify any other Customers who currently own substations interconnected with PPL Electric’s system, and explain whether PPL Electric’s tariff or interconnection agreements treat customer-owned substations differently from utility-owned substations with respect to cost responsibility for upstream transmission facilities.

...

5: Please refer to the Letter of Notification (LON) page 7, “The prospective Customer is requesting 230 kV electrical service with an in-service date of December 15, 2026 and an initial load of 240 MW.”

...

b. Please provide all non-privileged written communications, meeting notes, emails, interconnection requests, and other documents exchanged between PPL Electric and the Customer regarding the Customer’s request for 230 kV electrical service, including any documents in which the Customer stated its reasons for requesting service at 230 kV rather than a lower voltage level.

...

d. Please identify any other instance in PPL Electric’s history where a Customer has requested new electrical service at 230 kV, and for each instance state the Customer’s initial load MW, the in-service date, and whether the associated transmission infrastructure costs were allocated to the Customer, to ratepayers, or shared, and in what proportion.

2. OCA Set II, Interrogatories Nos. 12-13, 15, and 21-24 request the following:

...

12: How much load does PPL currently have in its large load interconnection pipeline?

a. Please provide further qualification regarding whether this amount is subject to a contract with PPL, such as an Electric Service Agreement or Letter of Authorization, or is otherwise included in PPL’s pipeline.

b. Please identify how many potential interconnection customers have at least 50 megawatts of load at a single point of interconnection.

c. Please identify the load of the potential interconnection customers which have at least 50 megawatts of load at a single point of interconnection.

d. Please identify how many potential interconnection customers have at least 75 megawatts of load at multiple points of interconnection within a 10-mile radius.

e. Please identify the load of the potential interconnection customers which have at least 75 megawatts of load at multiple points of interconnection within a 10-mile radius.

13: Please provide a projection as to the cumulative impact of the interconnection of large load customers on PPL's FERC transmission formula rate each year for the next five years, based on PPL's projected additions to rate base associated with PPL's planned construction of interconnection facilities and planned load ramp across PPL's footprint. Please provide the analysis in live, Excel format with links intact.

...

15: Are there any pending legal proceedings regarding the development of the interconnecting Customer's property, such as zoning, permitting, or other, similar matters? If yes, please provide the docket number of the proceeding and court or administrative tribunal before which the proceeding has been initiated.

...

21: Provide the number of customers, by class, served by PPL in each of Luzerne, Carbon, and Schuylkill Counties.

22: Provide the number of customers, by class, served by PPL in each of Nescopeck, Black Creek, Sugarloaf, and Hazle Townships in Luzerne County, separately identified.

23: Does PPL consider resource adequacy (i.e., the availability of sufficient generation and energy resources to serve load interconnected to the grid) to be an aspect of reliable service? Explain.

24: Please describe PPL's procedures to require all electric generation suppliers to deliver energy to PPL at locations and in amounts which are adequate to meet the energy supplier's obligations to its customers.

3. PPL Electric objects to these requests on the grounds that they are overly broad, would be unreasonably burdensome to answer, and/or seek information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

4. OCA Set I, No. 2.b. is overly broad and seeks information that is not relevant and not likely to lead to the discovery of admissible evidence in this case, to the extent that it asks PPL

Electric to provide information regarding “any other Customers who currently own substations interconnected with PPL Electric’s system.” The Company has many customer-owned substations and it would constitute an unreasonable burden and expense should the Company be forced to pull interconnection agreements from each of its customer-owned substations in order to make the determination being requested in Set I, No. 2.b. Furthermore, the information sought by this request is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Any customer-owned PPL Electric substations not within the scope of the Project are outside the scope of this proceeding and, therefore, the identification of such substations and provision of information specific to those customer-owned substations is irrelevant. PPL Electric notes that it is willing to explain whether, as a general matter, “PPL Electric’s tariff or interconnection agreements treat customer-owned substations differently from utility-owned substations” as requested by this question.

5. OCA Set I, No. 5.b. is overly broad, unduly burdensome, and seeking information that is not relevant and not likely to lead to the discovery of admissible evidence. This is a “catch all” discovery request that lacks sufficient specificity as to the information or documents sought and generally lacks reasonable limitations in the subject matter sought. It also specifically fails to contain limitations on the subject matter sought to information within the scope of this proceeding. It would constitute an undue burden on the Company to compile, review, and provide all of the requested materials, which would almost certainly include voluminous irrelevant information.

6. OCA Set I, No. 5.d is overly broad, unduly burdensome, and seeking information that is not relevant and not likely to lead to the discovery of admissible evidence. It would be unduly burdensome for the Company to pull each and every customer request for electrical service at 230 kV, as well as all the associated information. Further, the information sought by this request

is irrelevant and not likely to lead to the discovery of admissible evidence. Only one request is the subject of the instant LON, and information regarding other customer requests for electrical service at 230 kV is not relevant to the proceeding and determination at hand.

7. OCA Set II, No. 12 is overly broad, and seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The amount of load in the Company's large load interconnection pipeline has no relevance to the instant LON, which concerns one customer's (the "Customer") interconnection request the Tap Lines necessary to interconnect and provide service to that Customer. As such, this request seeks information outside of the scope of this proceeding, which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

8. OCA Set II, No. 13 is also overly broad, and seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Information regarding "the cumulative impact of the interconnection of large load customers on PPL's FERC transmission formula rate each year for the next five years" and "planned construction of interconnection facilities and planned load ramp across PPL's footprint" is irrelevant and not likely to lead to the discovery of admissible evidence. Only the Project that is the subject of the above-captioned LON is within the scope of this proceeding. No other interconnections or facilities are the subject of this case. The "cumulative impact" of large load interconnections on PPL's "FERC transmission formula rate" is also irrelevant and outside the scope of this proceeding; PPL Electric's FERC transmission formula rate is subject to the exclusive jurisdiction of FERC.

9. OCA Set II, No. 15 seeks information that would be unreasonably burdensome to produce, and information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. This request seeks information related to the Customer's zoning and

permitting processes, which is not within the scope of PPL Electric's responsibility and not within PPL Electric's possession or control. Thus, it would be unreasonably burdensome for PPL Electric to provide this information. The request also seeks information related to the Customer's non-HV transmission line facilities; the Customer's non-HV transmission line facilities, are not within the scope of this proceeding and, therefore, are irrelevant to the Commission's determinations under 52 Pa Code Ch. 57, Subch. G.

10. OCA Set II, Nos. 21 and 22 also seek information that is not relevant and are also not reasonably calculated to lead to the discovery of admissible evidence. The customer information requested in these interrogatories has no bearing on the instant LON proceeding. Moreover, PPL Electric notes that the Project will occur entirely on either existing, PPL Electric-owned right-of-way ("ROW") or on Customer-owned property.

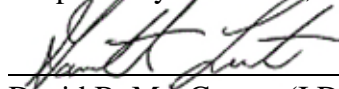
11. OCA Set II, No. 24 is not reasonably calculated to lead to the discovery of admissible evidence. Issues regarding electric generation supplier ("EGS") deliverability are not relevant to the Commission's review of this Project under 52 Pa. Code Ch. 57, Subch. G.

## II. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation objects to OCA Set I, Interrogatories Nos. 2.b, 5.b, and 5.d and to OCA Set II, Interrogatories Nos. 12-13, 15, 21-22, and 24 on the grounds that they are overly broad, would be unreasonably burdensome to answer, and/or seek information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, PPL Electric Utilities Corporation reserves the right to object to future interrogatories, requests for admissions, and requests for production of documents, including any instructions and definitions contained therein.

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