

COMMONWEALTH OF PENNSYLVANIA



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May 7, 2026

Via Electronic Filing

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

Re: Application of PPL Electric Utilities Corporation, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to (1) Bifurcate and Rebuild 4.4 Miles of the Existing Sunbury-Susquehanna #1 230 kV Transmission Line; (2) Construct 0.9 Miles of New Transmission Line Tap for Future 230 kV Double-Circuit Operation; (3) Raise Approximately 0.5 Miles of the Sunbury-Susquehanna 500 kV Transmission Line; and (4) Construct 11.2 Miles of New Double-Circuit 230 kV Transmission Line for Future Double-Circuit 500 kV Capacity, Located in Black Creek, Hazle, Hollenback, Nescopeck, and Sugarloaf Townships in Luzerne County, Pennsylvania; Docket No. A-2026-3061547;

Application of PPL Electric Utilities Corporation Under 15 Pa.C.S. § 1511(c) For A Finding And Determination That The Service To Be Furnished By The Applicant Through Its Proposed Exercise Of The Power Of Eminent Domain To Acquire A Certain Portion Of The Lands of Baidwan Investments LLC in Hazle Township, Luzerne County, Pennsylvania For The Sugarloaf 500/230 kV Transmission Line Associated With The Proposed Sugarloaf 500/230 kV Transmission Line Project Is Necessary Or Proper For The Service, Accommodation, Convenience, Or Safety Of The Public; Docket No. A-2026-3061549 et al.; and,

Petition of PPL Electric Utilities Corporation for Findings that a Structure to Shelter Electrical and Control Equipment at the Proposed Nescopeck Switchyard in Nescopeck Township, Luzerne County, Pennsylvania Is Reasonably Necessary for the Convenience or Welfare of the Public; Docket No. P-2026-3061609

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
May 7, 2026
Page 2

Dear Secretary Homsher:

For electronic filing, please find enclosed the Protest and Public Statement of the Office of Consumer Advocate.

Respectfully submitted,

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

Enclosures

cc: Administrative Law Judge Steven K. Haas (Via Email Only: sthaas@pa.gov)
Administrative Law Judge Emily A. Farren (Via Email Only: efarren@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

Application of PPL Electric Utilities Corporation, Filed :
Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for :
Approval to (1) Bifurcate and Rebuild 4.4 Miles of the :
Existing Sunbury-Susquehanna #1 230 kV Transmission : Docket Nos.
Line; (2) Construct 0.9 Miles of New Transmission Line : A-2026-3061547
Tap for Future 230 kV Double-Circuit Operation; (3) Raise :
Approximately 0.5 Miles of the Sunbury Susquehanna 500 :
kV Transmission Line; and (4) Construct 11.2 Miles of New :
Double-Circuit 230 kV Transmission Line for Future :
Double-Circuit 500 kV Capacity, Located in Black Creek, :
Hazle, Hollenback, Nescopeck, and Sugarloaf Townships in :
Luzerne County, Pennsylvania Application of NextEra :
Energy Transmission MidAtlantic, Inc., for All of the :
Necessary Authority, Approvals, and Certificates of Public :
Convenience (1) to Begin to Furnish and Supply Electric :
Transmission Service in Greene County and Fayette :
County, Pennsylvania; (2) for Certain Affiliated Interest :
Agreements; and (3) for any Other Approvals Necessary to :
Complete the Contemplated Transactions :
:
:

Application of PPL Electric Utilities Corporation under 15 :
Pa.C.S. § 1511(c) for a Finding and Determination that the :
Service to Be Furnished by the Applicant Through Its :
Proposed Exercise of the Power Of Eminent Domain to :
Acquire Certain Portions of Lands in Hazle Township, : A-2026-3061549 *et al.*
Luzerne County, Pennsylvania for the Sugarloaf 500/230 :
kV Transmission Line Associated with the Proposed :
Sugarloaf 500/230 kV Transmission Line Project Is :
Necessary or Proper for the Service, Accommodation, :
Convenience, or Safety of the Public :
:
:

Petition of PPL Electric Utilities Corporation for Findings :
that a Structure to Shelter Electrical and Control Equipment :
at the Proposed Nescopeck Switchyard in Nescopeck : P-2026-3061609
Township, Luzerne County, Pennsylvania Is Reasonably :
Necessary for the Convenience or Welfare of the Public :

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 and Public Statement, 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 May 2026.

SERVICE BY E-MAIL ONLY

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Respectfully submitted,

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Consumer Advocate

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717-783-5048

Dated: May 7, 2026

/s/ Jacob Guthrie
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Assistant Consumer Advocate

Melanie Joy El Atieh, PA Attorney I.D #209323
Deputy Consumer Advocate

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Email: OCASugarloaf2026@paoca.org

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities Corporation, Filed :
Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for :
Approval to (1) Bifurcate and Rebuild 4.4 Miles of the :
Existing Sunbury-Susquehanna #1 230 kV Transmission : Docket Nos.
Line; (2) Construct 0.9 Miles of New Transmission Line : A-2026-3061547
Tap for Future 230 kV Double-Circuit Operation; (3) :
Raise Approximately 0.5 Miles of the Sunbury :
Susquehanna 500 kV Transmission Line; and (4) :
Construct 11.2 Miles of New Double-Circuit 230 kV :
Transmission Line for Future Double-Circuit 500 kV :
Capacity, Located in Black Creek, Hazle, Hollenback, :
Nescopeck, and Sugarloaf Townships in Luzerne County, :
Pennsylvania Application of NextEra Energy :
Transmission MidAtlantic, Inc., for All of the Necessary :
Authority, Approvals, and Certificates of Public :
Convenience (1) to Begin to Furnish and Supply Electric :
Transmission Service in Greene County and Fayette :
County, Pennsylvania; (2) for Certain Affiliated Interest :
Agreements; and (3) for any Other Approvals Necessary :
to Complete the Contemplated Transactions :
:
:

Petition of PPL Electric Utilities Corporation for Findings :
that a Structure to Shelter Electrical and Control :
Equipment at the Proposed Nescopeck Switchyard in : P-2026-3061609
Nescopeck Township, Luzerne County, Pennsylvania Is :
Reasonably Necessary for the Convenience or Welfare of :
the Public :
:
:

Application of PPL Electric Utilities Corporation under :
15 Pa.C.S. § 1511(c) for a Finding and Determination that :
the Service to Be Furnished by the Applicant Through Its : A-2026-3061549 *et al.*
Proposed Exercise of the Power Of Eminent Domain to :
Acquire Certain Portions of Lands in Hazle Township, :
Luzerne County, Pennsylvania for the Sugarloaf 500/230 :
kV Transmission Line Associated with the Proposed :
Sugarloaf 500/230 kV Transmission Line Project Is :
Necessary or Proper for the Service, Accommodation, :
Convenience, or Safety of the Public :
:
:

PROTEST OF THE
OFFICE OF CONSUMER ADVOCATE

Under 52 Pa. Code Sections 5.51, *et seq.*, the Office of Consumer Advocate (OCA) files this Protest to the Applications and Petition of PPL Electric Utilities Corporation (PPL or Company). On April 6, 2026, PPL filed the above-captioned Applications with the Pennsylvania Public Utility Commission (Commission). Under 52 Pa. Code Section 57.72, PPL filed an Application for approval to bifurcate, rebuild, construct, and raise a holistic project of connected transmission lines between the existing Susquehanna 230 kV Switchyard and Harwood Substation in Conyngham, Hollenback, Nescopeck, Black Creek, Sugarloaf, and Hazle Townships, Luzerne County, Pennsylvania (Siting Application). Under 15 Pa.C.S. Section 1511(c), PPL filed various Applications to condemn other Pennsylvania property owners' land to use for this transmission project (Condemnation Applications). And under 52 Pa. Code Section 5.41 and 53 P.S. Section 10619, PPL filed a Petition "for a finding that one structure to shelter electrical control equipment . . . at the proposed PPL Electric-owned Nescopeck 230 kilovolt" (kV) "Switchyard in Nescopeck Township, Luzerne County, Pennsylvania . . . is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance" (Zoning Petition).

These filings are all part of the same effort to take Pennsylvania citizens' land to build a transmission project to serve PPL's anticipated AI data center customer and an

additional cluster of what appear to be anticipated AI data center customers.¹ The first new customer in Hazle Township identified in the Siting Application would start at 240 megawatts (MW) in 2028 and increase to 965 MW by 2033.² Additional customers have asked for “over 5,000 MW by 2033.”³ That means connecting AI data centers with peak electricity demand equivalent to more than twice that of the City of Pittsburgh.⁴

To address some of the electric reliability problems associated with connecting these AI data centers to the grid, PPL proposed a two-phase project. Both phases are connected and seek to solve the same set of reliability problems.⁵ This Protest concerns the second phase, and the second phase necessarily concerns the first phase. PPL intends the second

¹ See Siting Application PP 21-22 (identifying PPL’s anticipated new large loads); Kent Jackson, *PPL Says High Voltage Line Will Protect Against Power Shortages*, STANDARD SPEAKER (May 1, 2026), <https://www.standardspeaker.com/2026/05/01/ppl-says-high-voltage-line-will-protect-against-power-shortages/> (“The application doesn’t name the customer, but NorthPoint Development of Kansas City, Missouri is building a data center campus called project Hazelnut in Hazle Twp. on land where the Tomhicken Switchyard is proposed.”). “Emails obtained by Concerned Citizens of Montour County reveal that NorthPoint is building Project Hazelnut for Amazon Web Services.” *Id.* “Northpoint Development plans to build a data center campus with 15 data center buildings Plans call for five buildings to be constructed starting in late 2026, followed by three buildings starting in 2028 and seven buildings starting in 2029.” Eric Mark, *County Council Infrastructure Committee to Discuss Proposed Tax Break for Hazle Twp. Data Center Complex*, CITIZENS’ VOICE (Jan. 19, 2025), <https://www.citizensvoice.com/2025/01/19/county-council-infrastructure-committee-to-discuss-proposed-tax-break-for-hazle-twp-data-center-complex/>. PPL’s projects in the area have been linked to AI data center development. Ethan Dodd, *AI Data Centers Meet Community Resistance in PA*, REALCLEAR PA. (July 10, 2025), https://www.realclearpennsylvania.com/articles/2025/07/10/data_centers_becoming_a_top_debate_in_pa_1121995.html (linking PPL projects in Sugarloaf Township to AI data center development).

² *Id.* P 21.

³ *Id.* P 22.

⁴ PAUL T. DISKIN, PA. PUB. UTIL. COMM’N, *ELECTRIC POWER OUTLOOK FOR PENNSYLVANIA 2023–2028*, at 34 (2024), https://www.puc.pa.gov/media/3124/2024-epo-2023-2028-7-2024_final.pdf (reporting 2,534 MW peak load in Duquesne Light Company’s service territory, which includes Pittsburgh and more, in 2023).

⁵ Siting Application PP 23-26.

phase (Sugarloaf or Project) in significant part to “support the interconnection of the proposed Tomhicken Switchyard,” which is the first phase.⁶ Thus, PPL has identified that the two inextricably linked phases are part of the same project to serve a significant increase in load.

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 shown in the signature line of this Protest. The OCA has created a group email for purposes of receipt of email service and requests that all parties utilize the group email.

That group email is: OCASugarloaf2026@paoca.org.

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.⁷
4. The Commission has jurisdiction over the lines in question and must examine the

⁶ *Id.* P 26.

⁷ 71 P.S. §§ 309-1, *et seq.*

Siting Application,⁸ Condemnation Applications,⁹ and Zoning Application.¹⁰

5. The OCA requests that the Commission consolidate these proceedings with the proceedings in Docket No. A-2025-3059443 (regarding the Tomhicken Switchyard and Susquehanna-Harwood lines). These two proceedings share common questions of law and fact as the two “phases” compose a single project. PPL intends the second phase—the Sugarloaf Project at issue here—to “support the interconnection of the proposed Tomhicken Switchyard,” which is the first phase at issue in Docket No. A-2025-3059443.¹¹ Consolidating these proceedings for purposes of hearings, briefing, and adjudication would promote administrative economy and is in the public interest. Consolidation would promote efficiency without burdening Pennsylvania citizens’ vital rights—to oppose electric grid infrastructure that impacts their lives and land—through unnecessary prejudice, delay, or confusion. The OCA has separately filed a Motion for Consolidation at the relevant dockets regarding this request.

6. The Commission may not grant the Siting Application 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

⁸ 52 Pa. Code §§ 57.72(a)–(c).

⁹ 15 Pa.C.S. § 1511(c).

¹⁰ 52 Pa. Code § 5.41; 53 P.S. § 10619.

¹¹ Siting Application P 26.

- (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.¹²

7. Regarding need, given that the entirety of the project identified in Phase 1 LON and the Phase 2 Application were supplemental projects before PJM¹³, there is no conflict preemption under *Transource Pa., LLC v. DeFrank*, 156 F.4th 351, 379 (3d Cir. 2025), affirming *Transource Pa., LLC v. DeFrank*, 705 F. Supp. 3d 266 (M.D. Pa. 2023) (*Transource*). Accordingly, the Commission can make a determination of need that is different from the public utility's need determination. PJM's current tariff authority to review the need, prudence and cost-effectiveness of transmission expansion extends only to transmission projects needed to resolve region-wide system reliability violations based on PJM criteria, or for projects needed to meet state public policy goals such as renewable portfolio standards.¹⁴ The projects subject to PJM Board oversight and approval are often called regional baseline projects, regional network upgrades or Public Policy Projects. Local projects, identified as "Supplemental Projects" in PJM's Operating Agreement and Tariff, are included in the RTEP, but are only reviewed by PJM for the potential negative impact they might have on the regional system.¹⁵ Indeed, Section 1.5.6(n) specifically states:

Certain Regional RTEP Project(s) and Subregional RTEP Project(s) may not

¹² 52 Pa. Code § 57.76(a).

¹³ PJM is the Regional Transmission Organization (RTO) which operates the interstate transmission grid for all or parts of Pennsylvania, Delaware, Illinois, Kentucky, Indiana, Maryland, Michigan, New Jersey, North Carolina, Ohio, Tennessee, Virginia, West Virginia, and the District of Columbia, inclusive of PPL's service territory.

¹⁴ PJM Operating Agreement, Schedule 6, § 1.5.6(n).

¹⁵ PJM Operating Agreement, Schedule 6, § 1.5.6(n).

be required for compliance with the following PJM criteria: system reliability, market efficiency or operational performance, pursuant to a determination by the Office of the Interconnection. *These Supplemental Projects shall be separately identified in the RTEP and are not subject to approval by the PJM Board.*¹⁶

The important point here is that, unlike regional RTEP projects, Supplemental Projects are not approved by the PJM Board. They are not reviewed by PJM for their need, prudence or their cost-effectiveness and cost efficiency for utility consumers.¹⁷

8. The Commission may not grant the Condemnation Applications unless it finds “after notice and opportunity for hearing, that the service to be furnished by the corporation through the exercise of those powers is necessary or proper for the service, accommodation, convenience or safety of the public.”¹⁸

9. No branch of Commonwealth government—including the Commission—can approve the exercise of eminent domain to take Pennsylvania citizens’ property for economic development purposes; instead, Pennsylvania law requires that “the public must be the primary and paramount beneficiary of the taking.”¹⁹

10. The Commission may not grant the Zoning Petition unless it finds, “after a public hearing, . . . that the present or proposed situation of the building in question is reasonably necessary for the convenience or welfare of the public.”²⁰

11. The OCA is concerned by the estimated cost of building this Project. PPL currently

¹⁶ *Id.* (emphasis added).

¹⁷ *Id.*; see also PJM Operating Agreement, Schedule 6, section 1.6(a).

¹⁸ 15 Pa.C.S. § 1511(c).

¹⁹ *Robinson Twp. v. Commonwealth*, 147 A.3d 536, 586-88 (Pa. 2016) (quoting *In re Opening Priv. Rd. for Benefit of O’Reilly*, 5 A.3d 246, 258 (Pa. 2010)).

²⁰ 53 P.S. § 10619.

estimates a \$118.5 million total cost.²¹ PPL states that it plans to allocate this cost across all PPL Electric customers.²² PPL also notes a list of factors that could drive up the cost of the Project over time.²³

12. This cost could be disproportionately allocated to PPL’s non-AI-data-center ratepayers even though those ratepayers may not receive a commensurate benefit—or any benefit at all—from grid infrastructure built to connect the significant increase in peak electricity demand. PPL claims, without sufficient justification, that it “anticipates that new, incremental load upon the transmission system will have a positive impact upon the transmission rates paid by its customers.”²⁴ To the contrary, adding that load may already be leading to increased rates for PPL’s non-AI-data-center customers.²⁵ The Commission should examine these potentially unjust outcomes and permit the OCA to investigate further.

13. PPL may not have adequately and thoroughly explored various alternatives to the proposed Project, including, but not limited to, grid-enhancing technologies, demand-side options, and whether building the Project is the best long-term option for improved reliability, resiliency, and ratepayer affordability.

14. PPL may not have considered the White House’s Ratepayer Protection Pledge and

²¹ Siting Application at ES-3.

²² *Id.*

²³ *Id.* at n.1.

²⁴ Siting Application, Attach. 2 at 8.

²⁵ See Protest and Request for Evidentiary Hearing of the Pennsylvania Office of Consumer Advocate at 9, 14-15, *Kammer Juniata Transmission, LLC*, FERC Docket No. ER26-1734 (Apr. 7, 2026), https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20260407-5099 (identifying PPL’s “Susquehanna Cluster” and its role in causing PJM to select a \$1.9 billion regional transmission project).

other policy developments that will strongly incentivize AI data center firms to build “Bring Your Own Generation” (BYOG) projects.²⁶ If the massive new large load cluster opts to build BYOG projects, that could eliminate electric reliability violations that PPL anticipates.

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.²⁷

16. The Project could create unreasonable risks that endanger the health and safety of Pennsylvania citizens living in the Project’s path.

17. The additional load connected through this Project could negatively affect the reliability of PPL’s service. Interconnecting over 5,000 MW of new load through the Project may result in less reliable service for PPL’s customers because this may cause system reliability and resource adequacy problems. For example, the North American Electric Reliability Corporation (NERC) has issued a Level 3 alert regarding “the reliability challenges posed by the rapid growth of computational large loads, with many utilities lacking a formalized definition of ‘large load’ and most not having taken any steps to meet

²⁶ THE WHITE HOUSE, RATEPAYER PROTECTION PLEDGE (Mar. 4, 2026), <https://www.whitehouse.gov/releases/2026/03/ratepayer-protection-pledge/>.

²⁷ 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. Evtl. 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)).

NERC's recommendations."²⁸

18. 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 and site visits in 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.

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

²⁸ Holden Mann, *NERC Board Approves Large Loads Level 3 Alert*, RTO INSIDER (Apr. 16, 2026), <https://www.rtoinsider.com/130358-nerc-board-approves-large-loads-level-3-alert/>; *NERC Issues Level 3 Alert, Reliability Guideline Focused on Large Load Challenges*, NERC (May 4, 2026), <https://www.nerc.com/newsroom/nerc-issues-level-3-alert-reliability-guideline-focused-on-large-load-challenges>.

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,

Counsel for:
Darryl A. Lawrence
Consumer Advocate

/s/ Jacob Guthrie
Jacob Guthrie, PA Attorney I.D. # 334367
Assistant Consumer Advocate

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Josiah B. Harmar, PA Attorney I.D. # 338426
Assistant Consumer Advocate

Dated: May 7, 2026

Email: OCASugarloaf2026@paoca.org

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). Under Act 161, and for the following reasons, the Consumer Advocate will participate in proceedings before the Commission involving PPL Electric Utilities Corporation (PPL or Company) and its efforts to build transmission infrastructure to serve new large load customers such as AI data centers. PPL proposes to locate the facilities at issue here in Conyngham, Hollenback, Nescopeck, Black Creek, Sugarloaf, and Hazle Townships, Luzerne County, Pennsylvania.

On April 6, 2026, PPL filed transmission line siting and condemnation Applications and a zoning exemption Petition with the Pennsylvania Public Utility Commission (Commission). Under 52 Pa. Code Section 57.72, PPL filed an Application for approval to bifurcate, rebuild, construct, and raise a holistic project of connected transmission lines between the existing Susquehanna 230 kV Switchyard and Harwood Substation in Conyngham, Hollenback, Nescopeck, Black Creek, Sugarloaf, and Hazle Townships, Luzerne County, Pennsylvania (Siting Application). Under 15 Pa.C.S. Section 1511(c), PPL filed various Applications to condemn other Pennsylvania property owners' land to use for this transmission project (Condemnation Applications). And under 52 Pa. Code Section 5.41 and 53 P.S. Section 10619, PPL filed a Petition "for a finding that one structure to shelter electrical control equipment . . . at the proposed PPL Electric-owned Nescopeck 230 kilovolt" (kV) "Switchyard in Nescopeck Township, Luzerne County,

Pennsylvania . . . is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance” (Zoning Petition).

These Siting Application, Condemnation Applications, and Zoning Petition are all part of the same effort to take Pennsylvania citizens’ land to build a transmission project to serve PPL’s anticipated AI data center customer and an additional cluster of anticipated new large loads such as AI data centers. The first new customer in Hazle Township identified in the Siting Application would start at 240 megawatts (MW) in 2028 and increase to 965 MW by 2033. Additional customers have asked for “over 5,000 MW by 2033.” That means connecting new large loads such as AI data centers with peak electricity demand equivalent to more than twice that of the City of Pittsburgh.

The Office of Consumer Advocate (OCA) has determined to participate in this proceeding in order to protect the interests of all customers who may be affected by PPL’s Applications and Petition. The OCA seeks to ensure that PPL provides adequate and continuous service to all customers in a just and reasonable manner, in accordance with applicable statutes and regulations. The OCA will review the proposed project, to evaluate its design, need, cost, and other effects on health, safety, and the environment, and to ensure that regulators allocate the project’s costs according to cost causation principles.