

COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

✕ @pa_oca
f /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

July 6, 2026

Via Electronic Filing

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

Re: Letter of Notification of PPL Electric Utilities Corporation filed pursuant to 52 PA. Code Chapter 57 with respect to the 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:

Attached for electronic filing, please find the Motion for Leave to Submit Supplemental Direct Testimony of the Office of Consumer Advocate (OCA) in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

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 Erin L. Gannon (Via Email Only: egannon@pa.gov)
Administrative Law Judge John M. Coogan (Via Email Only: jcoogan@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

Letter of Notification of PPL Electric :
Utilities Corporation filed pursuant to 52 :
PA Code Chapter 57 with respect to the :
approval to build approximately 1.1 miles : Docket No. A-2025-3059443
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 :

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 Motion for Leave to Submit Supplemental Direct Testimony of the Office of Consumer Advocate, 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 6th day of July 2026.

SERVICE BY E-MAIL ONLY

Michael J. Shafer, Esq.
Michelle L. Bartolomei
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
mjshafer@pplweb.com
mlbartolomei@pplweb.com
Counsel for PPL

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

David B. MacGregor, Esq.
Garrett P. Lent, Esq.
Lindsay A. Berkstresser, Esq.
Hayley E. Wilburn, Esq.
Thomas Connolly
Brittney Corey
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101
dmacgregor@postschell.com
glent@postschell.com
lberkstresser@postschell.com
hwilburn@postschell.com
tconnolly@postschell.com
bcorey@postschell.com
Counsel for PPL

Erika Cook
38 Red Rock Road
Sugarloaf, PA 18249
elcook33@gmail.com

Counsel for:
Darryl A. Lawrence
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: 717-783-5048
Fax: 717-783-7152

Dated: July 6, 2026

/s/ Jacob Guthrie

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

Melanie Joy El Atieh, Esq.
Deputy Assistant Consumer Advocate
PA Attorney I.D. # 209323
Email: MEIAtieh@paoca.org

Josiah B. Harmar, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 338426
Email: JHarmar@paoca.org

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Letter of Notification of PPL Electric :
Utilities Corporation filed pursuant to :
52 PA Code Chapter 57 with respect to :
the approval to build approximately 1.1 : Docket No. A-2025-3059443
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 :

MOTION FOR LEAVE TO SUBMIT SUPPLEMENTAL DIRECT TESTIMONY
OF THE OFFICE OF CONSUMER ADVOCATE

AND NOW, before Administrative Law Judges (ALJs) Erin L. Gannon and John M. Coogan the Pennsylvania Office of Consumer Advocate (OCA) files this Motion for Leave to Submit Supplemental Direct Testimony (Motion), pursuant to 52 Pa. Code Section 5.103.¹ In this Motion, the OCA requests that the ALJs permit parties leave to submit Supplemental Direct Testimony regarding the public input hearing testimony taken on June 30, 2026. In support thereof, the OCA avers as follows:

I. INTRODUCTION

On December 19, 2025, PPL Electric Utilities Corporation (PPL or Company) filed a Letter of Notification (LON) with the Commission, pursuant to 52 Pa. Code Section 57.72(d)(1)(iii) and (vi), to build approximately 1.1 miles of new parallel double-circuit

¹ 52 Pa. Code § 5.103

230 kilovolt (kV) transmission taps that PPL claims are needed to connect the existing Susquehanna-Harwood #1 & #2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard (Phase 1 LON or Phase 1). Phase 1 also includes the construction of two new 0.1-mile-long 230 kV transmission lines from the Tomhicken 230 kV Switchyard to a new customer-owned 230-34 kV substation. Phase 1 is located in Hazle Township, Luzerne County, Pennsylvania.

On December 30, 2025, the OCA filed a Notice of Intervention and Public Statement regarding the Phase 1 LON. On January 7, 2026, the OCA filed a Protest.

On March 12, 2026, Erika Cook filed a Protest to the Phase 1 LON. On March 13, 2026, John Zola filed a Protest to the Phase 1 LON.

On March 18, 2026, ALJs Gannon and Coogan convened a Prehearing Conference regarding the Phase 1 LON, wherein the ALJs established a procedural schedule for litigation of the Phase 1 LON, including the submission of direct testimony by PPL and the other parties, public input hearings, rebuttal testimony, surrebuttal testimony, rejoinder testimony, evidentiary hearings, and main and reply briefs.

On May 5, 2026, a Public Input Hearing Notice for the Phase 1 LON was issued, scheduling two public input hearings, one afternoon and one evening, on June 30, 2026, in Hazleton, Pennsylvania.

The OCA now submits this Motion for Leave to Submit Supplemental Direct Testimony regarding those matters raised at the Public Input Hearings held on June 30, 2026.

II. LEGAL STANDARDS

Pursuant to Section 5.103 of the Commission’s regulations, “[a] request may be made by motion for relief desired, except as may be otherwise expressly provided in this chapter and Chapters 1 and 3 (relating to rules of administrative practice and procedure; and special provisions). A motion must set forth the ruling or relief sought, and state the grounds therefor and the statutory or other authority upon which it relies.”² 52 Pa. Code § 5.81.

The Public Utility Code provides that presiding officers in proceedings before the Commission are empowered to control the receipt of evidence.³ Presiding officers are further permitted to regulate the conduct of proceedings before the Commission.⁴ Furthermore, pursuant to Section 5.412 of the Commission’s regulations, the “[u]se of written testimony in Commission proceedings is encouraged.”⁵

III. MOTION FOR LEAVE TO SUBMIT SUPPLEMENTAL DIRECT TESTIMONY

The OCA intends to submit testimony providing a summary of the matters raised at the Public Input Hearings convened on June 30, 2026. However, the procedural schedule established in the ALJs’ Scheduling Order requires submission of the OCA’s direct testimony on July 8, 2026. Due to the observation of the July 4, 2026 holiday on July 3, 2026, the necessary time required to receive and review the transcripts of the June 30 Public Input Hearings, and the quantity and quality of the Public Input Hearing testimony admitted

² 52 Pa. Code § 5.103(a)

³ 66 Pa. C.S. § 331(d).

⁴ 52 Pa. Code § 5.483(a).

⁵ 52 Pa. Code § 5.412(a)

to the record on June 30, 2026, the OCA submits that it lacks sufficient time to develop its Public Input Hearing-related direct testimony by the July 8, 2026, direct testimony deadline.

Specifically, 32 non-party, lay witnesses provided testimony at the June 30, 2026, Public Input Hearings, in addition to the testimony of Protestant John Zola and Pennsylvania Representative Jamie Walsh. Each of the 1:00 PM and 6:00 PM hearings lasted approximately two hours and 45 minutes, inclusive of time taken for recesses and/or addressing matters off of the record.

Based on the OCA's experience, this amount of Public Input Hearing testimony will produce a transcript of significant length, which must be fully reviewed by the OCA's witness who will sponsor the Public Input Hearing-related testimony. It is unclear on what date the OCA will have access to the transcript for the Public Input Hearings, considering the holiday occurring on July 4, 2026, and observed on July 3, 2026, which may delay the court reporter's production and transmittal of the transcript to the Commission, which must then be separately transmitted to the OCA by the Commission.

The OCA routinely submits testimony summarizing the matters addressed at the Public Input Hearings convened in a proceeding, particularly in rate proceedings. This testimony is a critical component of the OCA's case-in-chief. Should the OCA not be able to receive an extension of time for the submission of Supplemental Direct testimony, the OCA's public input hearing-related testimony may not adequately capture the volume and complexity of views expressed at the June 30, 2026, Public Input Hearings, and may not be supported by adequate citation to the transcripts for those Hearings. Namely, the witness

responsible for the OCA's public input hearing-related testimony in this matter was unable to attend the June 30, 2026, Public Input Hearings and will need to rely on summaries provided by counsel for the OCA in order to support their testimony. Requiring the OCA to submit public input hearing-related testimony without the benefit of sufficient time to review the June 30, 2026, Public Input Hearing transcripts will result in an incomplete record in this proceeding and will affect the OCA's ability to adequately prepare its case.

The OCA requests that the ALJs permit the OCA to submit Supplemental Direct testimony on July 17, 2026. The OCA submits that granting the OCA leave to submit Supplemental Direct testimony will not harm the substantive rights of any party to this proceeding. All parties were in attendance at the June 30, 2026, Public Input Hearings, are aware of the matters discussed thereat, and will have the opportunity to submit rebuttal testimony responsive to the OCA's proposed supplemental direct testimony on August 7, 2026. The additional nine days' time for preparation of Supplemental Direct testimony will not unreasonably prevent the parties from producing an adequate response to the OCA's Supplemental Direct testimony if it is submitted on July 17, 2026.

On July 1, 2026, the OCA contacted the parties to this proceeding to request that they provide their respective positions on the instant request for leave to submit supplemental direct testimony. Protestants John Zola and Erika Cook informed the OCA that they would not object to the OCA's request. PPL informed the OCA that it objects to the OCA's request.

IV. CONCLUSION

For the foregoing reasons, the OCA respectfully requests that the ALJs permit the OCA to submit Supplemental Direct testimony regarding the Public Input Hearings convened on June 30, 2026, with a filing deadline of July 17, 2026.

Respectfully submitted,

/s/Jacob Guthrie

Jacob Guthrie

Assistant Consumer Advocate

PA Attorney I.D. # 334367

Email: JGuthrie@paoca.org

Counsel for:

Darryl A. Lawrence

Consumer Advocate

Office of Consumer Advocate

555 Walnut Street

Forum Place, 5th Floor

Harrisburg, PA 17101-1923

717-783-5048

Dated: July 6, 2026

Melanie Joy El Atieh

Deputy Consumer Advocate

PA Attorney I.D. # 209323

Email: MElAtieh@paoca.org

Josiah B. Harmar

Assistant Consumer Advocate

PA Attorney I.D. # 338426

Email: JHarmar@paoca.org