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July 6, 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 for Leave to Submit Supplemental Direct Testimony of the Office of Consumer Advocate ("OCA") in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Very truly yours,



Garrett P. Lent

GPL/sa
Attachment

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

**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 to	:
Connect the Existing Susquehanna-	:
Harwood #1 & #2 Transmission Lines to the	:
New Tomhicken 230 kV Switchyard that	:
are Respectively Located in Luzerne	:
County, Pennsylvania	:

Docket No. A-2025-3059443

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO THE MOTION FOR
LEAVE TO SUBMIT SUPPLEMENTAL DIRECT TESTIMONY OF THE OFFICE OF
CONSUMER ADVOCATE**

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

Pursuant to Section 5.61 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations,¹ PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Answer to the Motion for Leave to Submit Supplemental Direct Testimony (“Motion for Leave”) of the Office of Consumer Advocate (“OCA”) dated July 6, 2026. In its Motion, OCA requests that Administrative Law Judges Erin L. Gannon and John M. Coogan (the “ALJs”) permit it to submit its public input hearing-related testimony on July 17, 2026, as Supplemental Direct Testimony. For the reasons explained herein, OCA’s Motion for Leave should be denied.

I. PROCEDURAL BACKGROUND

¹ 52 Pa. Code § 5.61

1. The proceeding at Docket No. A-2025-3059443 (“Letter of Notification”) was initiated on December 19, 2025, when PPL Electric filed the above-captioned “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 to the New Tomhicken 230 kV Switchyard that are Respectively Located in Luzerne County, Pennsylvania” (hereinafter, the “Letter of Notification”) with the Pennsylvania Public Utility Commission (“Commission”). In the Letter of Notification, PPL Electric requested Commission approval to build 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 and #2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard (“Tomhicken Switchyard”). The Project also includes 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 new 230 kV Connecting Lines, Tap Lines, and Tomhicken 230 kV Switchyard (together, the “Tomhicken 230 kV Switchyard Project”) are located in Hazle Township, Luzerne County, Pennsylvania.

2. The Tomhicken 230 kV Switchyard Project is the first project of two that will be needed to serve new and future load within the area in which it will be constructed. The Tomhicken 230 kV Switchyard Project is referred to as “Phase 1” of these two projects. It is needed forthwith to interconnect a customer requesting transmission-level service in Hazle Township, Luzerne County, Pennsylvania to the 230 kV system.

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

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

5. On January 14, 2026, the Commission issued a Prehearing Conference Order.
6. On March 12, 2026, Erika Cook filed a Protest.
7. On March 13, 2026, John Zola filed a Protest.
8. On May 5, 2026, a Public Input Hearings Notice was issued, setting the date and time for the In-Person Public Input Hearings in the matter as Tuesday, June 30, 2026 at 1:00 PM and 6:00 PM.
9. On June 30, 2026, the Public Input Hearings convened as scheduled.
10. On July 6, 2026, PPL Electric was served with the instant Motion for Leave by OCA.

II. LEGAL STANDARD

11. Section 5.103 of the Commission’s regulations allows “[a] request [to] be made by motion for relief desired.”² The motion “must set forth the ruling or relief sought, and state the grounds therefor and the statutory or other authority upon which it relies.”³

12. Further, the Commission’s regulations provide presiding officers with the authority to, *inter alia*, “exclude irrelevant, immaterial or unduly repetitive evidence,” and to “otherwise regulate the course of the proceeding.”⁴

III. ARGUMENT

1. First, a large portion of the comments received pertained to a Full Siting Application filed by the Company at Docket No. A-2026-3061547. This Application, for the Sugarloaf 500/230 kV Transmission Line Project, is for “Phase 2” of the Tomhicken 230 KV Switchyard Project. This is a separate proceeding from the instant Letter of Notification.

² 52 Pa. Code § 5.103(a).

³ *Id.*

⁴ 52 Pa. Code § 5.483(a).

2. At the start of each Public Input Hearing, the ALJs clarified that the Hearing was specific to Phase 1, the Tomhicken 230 kV Switchyard Project, and not to Phase 2, the Sugarloaf 500/230 kV Transmission Line Project. The ALJs further asked that testimony primarily pertain to Phase 1.

3. However, PPL Electric submits that a substantial portion of the comments received pertained to Phase 2. These comments were allowed at the Public Input Hearing and individuals were provided with a full and fair opportunity to raise their concerns.

4. The ALJs denied OCA's Motion for Consolidation of the Phase 1 and Phase 2 matters.⁵

5. Therefore, facts and issues related to the Phase 2 Siting Application and/or eminent domain applications associated therewith are outside the scope of the instant Letter of Notification.

6. With respect to facts and issues related to the Phase 2 Siting Application and eminent domain applications, PPL Electric reserves its right to respond, object to, and/or make appropriate motions with respect to written direct testimony, including that of OCA once it is served, that addresses irrelevant and out-of-scope testimony regarding the Sugarloaf 500/230 kV Transmission Line Project, including attempts to incorporate or summarize public input hearing testimony regarding the same.

7. Consistent with this, a substantial portion of the comments received during the Public Input Hearings are outside of the scope of the proceeding, and it would not be appropriate to include testimony as to those comments within other parties' direct testimony. This substantially reduces the amount of Public Input Hearing testimony that parties can incorporate or summarize within their own direct testimony, should they so choose.

⁵ Order Denying Motion for Consolidation, Docket No. A-2025-3059443 (Order entered June 18, 2026).

8. Second, it is the Company's position that the number of comments received was not substantial enough to warrant extra time to provide Supplemental Direct Testimony.

9. 34 witnesses provided testimony across two Public Input Hearings, including testimony from Protestant John Zola and from Pennsylvania Representative Jamie Walsh.

10. OCA avers that, based on its experience, the transcript produced will be "of significant length," and that it will not have sufficient time to prepare adequate direct testimony by July 8, 2026, which is its existing deadline for providing direct testimony.⁶

11. However, OCA has not demonstrated why it should be provided additional time to summarize in its Supplemental Direct Testimony that Public Input Hearing testimony which is already in the record.

12. The testimony of the 34 witnesses which was provided at the Public Input Hearings was provided under oath, and will be part of the record in the instant proceeding, regardless of whether OCA submits further testimony on these statements.

13. Thus, the additional time requested by OCA to submit Supplemental Direct Testimony is not warranted simply so that OCA may summarize or restate arguments within the record.

14. Additionally, the amount of comments received is far less than might be received during the several public input hearings that often occur during other proceedings, such as rate cases. For example, during PPL Electric's most recent base rate case at Docket No. R-2025-3057164, seven public input hearings were held on six separate days, and over 100 comments were received across several distinct topics.

⁶ Motion for Leave at 4.

15. Finally, the comments received at the public input hearings largely covered very similar and repetitive topics.

16. These topics included: cost allocation, rate impacts, materialization of demand, health and safety, eminent domain, environmental concerns, and demonstrated need.

17. The repetitive nature of the issues spoken about at the Public Input Hearings will, indeed, lend itself to a summarization of the issues, and to the drafting and provision of a more concise testimony draft.

18. As explained in further detail herein, OCA should not be granted leave to prepare Supplemental Direct Testimony, because a large portion of comments were repetitive or similar and were outside of the scope of the instant proceeding, and because OCA has not adequately demonstrated otherwise why it requires 10 additional days to prepare its direct testimony as it pertains to 34 comments received at two Public Input Hearings which will be included in the record of the instant proceeding regardless of OCA's testimony repeating or summarizing the same.

IV. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Motion For Leave to Submit Supplemental Direct Testimony of the Office of Consumer Advocate be denied.

Respectfully submitted,

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Date: July 6, 2026

Attorneys for PPL Electric Utilities Corporation

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: July 6, 2026



Garrett P. Lent