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File #: 217668

July 17, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2n Floor
Harrisburg, PA 17101

**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, Conyngham, Hazle, Hollenback, Nescopeck, and Sugarloaf, Townships in Luzerne County, Pennsylvania
Docket No. A-2026-3061547**

**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**

**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, 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 Nos. A-2026-3061549, et al.**

Matthew L. Homsher, Secretary
July 17, 2026
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Dear Secretary Homsher:

Enclosed for filing, please find the Memorandum of PPL Electric Utilities Corporation Regarding Site Visits to Alternative Routes in the above-referenced proceedings.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Garrett P. Lent". The signature is fluid and cursive, with the first name "Garrett" and last name "Lent" clearly distinguishable.

Garrett P. Lent

GPL/sa
Attachment

cc: Administrative Law Judge Emily A. Farren (*w/attachment; via email only*)
Administrative Law Judge Steven K. Haas (*w/attachment; via email only*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Application has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 57.74(b).

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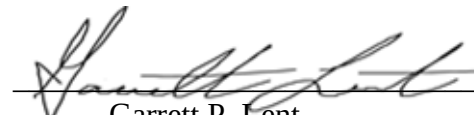
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Date: July 17, 2026


Garrett P. Lent

**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 Line; (2) Construct 0.9 Miles of : Docket No. A-2026-3061547
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, Conyngham, Hazle, :
Hollenback, Nescopeck, and Sugarloaf, :
Townships in Luzerne County, Pennsylvania :

Petition of PPL Electric Utilities Corporation :
for Findings That A Structure To Shelter :
Electrical And Control Equipment At The :
Proposed Nescopeck Switchyard In : Docket No. P-2026-3061609
Nescopeck Township, Luzerne County, :
Pennsylvania Is Reasonably Necessary For :
The Convenience Or Welfare Of The Public :

Application of PPL Electric Utilities : Docket Nos.
Corporation Under 15 Pa.C.S. § 1511(c) For : A-2026-3061549, A-2026-3061550
A Finding And Determination That The : A-2026-3061551, A-2026-3061552
Service To Be Furnished By The Applicant : A-2026-3061553, A-2026-3061554
Through Its Proposed Exercise Of The Power : A-2026-3061555, A-2026-3061556
Of Eminent Domain To Acquire Certain : A-2026-3061557, A-2026-3061560
Portions Of Lands In Hazle Township, : A-2026-3061561, A-2026-3061562
Luzerne County, Pennsylvania For The : A-2026-3061564, A-2026-3061566
Sugarloaf 500/230 kV Transmission Line : A-2026-3061567, A-2026-3061568
Associated With The Proposed Sugarloaf : A-2026-3061569, A-2026-3061570
500/230 kV Transmission Line Project Is : A-2026-3061571, A-2026-3061572
Necessary Or Proper For The Service, : A-2026-3061573, A-2026-3061576
Accommodation, Convenience, Or Safety Of : A-2026-3061577, A-2026-3061578
The Public : A-2026-3061579, A-2026-3061581
: A-2026-3061582, A-2026-3061583,
: A-2026-3061584, A-2026-3061585

**MEMORANDUM OF PPL ELECTRIC UTILITIES CORPORATION
REGARDING SITE VISITS ON ALTERNATE ROUTES**

TO ADMINISTRATIVE LAW JUDGES EMILY A. FARREN AND STEVEN K. HAAS:

Pursuant to the direction of Administrative Law Judges Emily A. Farren and Steven K. Haas (the “ALJs”), at the Prehearing Conference held on July 10, 2026, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits a Memorandum in support of its argument against scheduling site visits for properties located along the alternate routes for the Sugarloaf 500/230 kV Transmission Line Project.¹

I. RELEVANT BACKGROUND

1. On April 6, 2026, PPL Electric filed a Siting Application pursuant to 52 Pa. Code § 57.72, requesting Pennsylvania Public Utility Commission (“Commission”) approval for the Sugarloaf 500/230 kV Transmission Line Project. Consistent with 52 Pa. Code § 57.72(c)(10),² PPL Electric utilized an Alternatives and Siting Analysis to determine the most reasonable route for the components of the Sugarloaf 500/230 kV Transmission Line Project, which included the selection of a “Proposed Route”³ from several “Alternative Routes,” based on the evaluation of

¹ The Sugarloaf 500/230 kV Transmission Line Project (or “Project”) consists of: (1) rebuilding approximately 4.4 miles of the existing single-circuit Sunbury-Susquehanna #1 230 kilovolt (“kV”) Transmission Line for double-circuit 230 kV operation from the existing Susquehanna Switchyard to the proposed Nescopeck 230 kV Switchyard; (2) constructing a new approximately 0.9-mile-long 230 kV transmission line tap for future 230 kV double-circuit operation from the existing single-circuit Sunbury-Susquehanna #1 230 kV Transmission Line to the new Nescopeck 230 kV Switchyard; (3) raising approximately 0.5 miles of the Sunbury-Susquehanna 500 kV Transmission Line to accommodate the undercrossing of the proposed Susquehanna-Nescopeck #1 and #2 230 kV Transmission Lines and the proposed Sunbury-Nescopeck #1 230 kV Transmission Line; and (4) constructing a new 11.2-mile-long 230 kV transmission line for future double-circuit 500 kV capacity between the proposed Nescopeck 230 kV Switchyard, new Tomhicken 230 kV Switchyard, and the existing Harwood 230/69 kV Substation.

² With respect to the siting of a proposed HV transmission line, the Commission’s regulations require that an applicant provide “[a] general description of reasonable alternative routes to the proposed HV line, including a description of the corridor planning methodology, a comparison of the merits and detriments of each route, and a statement of the reasons for selecting the proposed HV line route.” 52 Pa. Code § 57.72(c)(10).

³ “Alternative Routes” are “Potential Routes” that have been considered and refined as a part of the siting analysis.

potential impacts associated with each route.⁴ Descriptions of the Alternatives and Siting Analysis and the Alternate Routes identified are provided on pages 15 through 24 of the Siting Application.

2. Also on April 6, 2026, PPL Electric filed 30 Condemnation Applications, pursuant to 15 Pa.C.S. § 1511(c), seeking findings that the electric service to be furnished by PPL Electric through the exercise of the power of eminent domain associated with the Sugarloaf 500/230 kV Transmission Line Project is necessary or proper for the service, accommodation, convenience, or safety of the public.⁵

3. Protests in opposition to the Sugarloaf 500/230 kV Transmission Line Project were filed by a number of landowners in this proceeding, some of whom own properties subject to Condemnation Applications located within the Proposed Route selected for the Project, and some of whom own properties located along the Alternative Routes considered for the Project.

4. During the Prehearing Conference held on July 10, 2026, several landowners requested site visits at their properties. While PPL Electric raised no objection to conducting site visits for those landowners whose property is located along the Proposed Route for the Project, PPL Electric raised concerns with conducting site visits for properties located on Alternative Routes for the Project.

5. In light of the disagreement among the parties as to whether to conduct site visits for properties located on Alternative Routes for the Project, the ALJs directed the parties to submit memoranda containing legal support for their positions.

⁴ The Proposed Route is the Alternative Route that was determined to be the most reasonable route based upon the siting evaluation criteria and in consideration of the cumulative environmental, engineering and constructability, social, and financial impacts.

⁵ 15 Pa.C.S. § 1511. PPL Electric also filed a Zoning Exemption Petition pursuant to 52 Pa. Code § 5.41 and 53 P.S. § 10619, for findings that a related control equipment shelter is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance.

6. As explained herein, site visits should be limited to properties located along the Proposed Route for the Project because it is the only route presented for the Commission's review and determination.

II. SITE VISITS SHOULD BE LIMITED TO PROPERTIES LOCATED ALONG THE PROPOSED ROUTE FOR THE PROJECT

7. The relevant siting consideration before the Commission is the reasonableness of the Company's Proposed Route. Requests to visit properties located along the Alternative Routes should be rejected because they will not aid the Commission's determination of whether the Company's Proposed Route is reasonable.

8. The Proposed Route is the only route that PPL Electric presented for consideration in this proceeding.

9. The Commission's regulations only require that the Commission make a determination as to the Company's Proposed Route. *See Bd. of Supervisors of Springfield Twp. v. Pa. PUC*, 41 A.3d 142, 149-50 (Pa. Cmwlth. 2012).

10. The transmission line siting process does not contemplate or allow the selection of a new route for the Project absent amendment of the Siting Application, which would trigger a new notice requirement to ensure that any newly impacted landowners and municipalities would have appropriate notice and opportunity to be heard on the new route. *See* 52 Pa. Code § 57.75(f).

11. The Commission has confirmed that a transmission line route cannot be altered absent amendment of the underlying application. In the Final Rulemaking Order for the current siting regulations, the Commission specifically rejected comments which "urge[d] that every landowner and local governmental unit which may be affected by the proposed line or any alternative route of the line should be made a formal party to the proceeding so that the grant of a siting certificate, however modified, would be binding on all." *See Re Overhead Electric*

Transmission Lines, 1978 Pa. PUC LEXIS 203, *16 (Order dated Mar. 1, 1978). The Commission reasoned that “[s]uch a practice would be unnecessarily cumbersome, and could be unfair in that it would seem to require participation by landowners who may never be affected by the line. We prefer the procedure as proposed, wherein if the application is amended those affected for the first time by the amendment will be given specific notice and opportunity to be heard and not otherwise.” *See id.* (emphasis added).

12. Limiting the site visits to properties within the Proposed Route will not prejudice landowners with properties located along Alternative Routes because they are not directly affected by the proposed Project and will not be directly affected unless the Siting Application is amended to select an Alternative Route.

13. Based upon the pleadings and prehearing memoranda filed to date, no party has advocated for the selection of Alternative Routes B or B1 in lieu of the Company’s Proposed Route,⁶ and parties who have referenced the Alternative Routes oppose their adoption. *See, e.g.*, Prehearing Memorandum of Joel and Victoria Butala, pp. 1-2. In the absence of support for the selection of either Alternative Route B or B1, PPL Electric maintains that there is no benefit to visiting sites along those routes.

14. In addition, PPL Electric’s inclusion of Alternatives Routes in its Siting Application does not justify site visits to properties located along the Alternative Routes.

15. Utilities must present alternative routes to provide “sufficient details on the routes that the utility actively considered in the final phase of its route selection process . . . to enable the Commission to fully evaluate the reasonableness of the utility’s route selection process.” *See Re:*

⁶ While certain parties have indicated their support for an alternate route for the Project, these parties have not stated that either Alternative Route B or B1 is preferable to the Company’s Proposed Route. *See, e.g.*, Prehearing Memorandum of Jason D. Zola and Daniel E. Zola, p. 5.

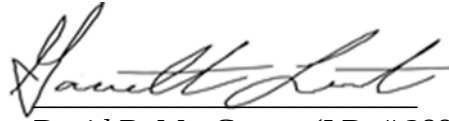
Interim Guidelines for the Filing of Electric Transmission Line Siting Applications, Docket No. M-2009-2141293 (Final Order Establishing Interim Guidelines entered Nov. 4, 2010), at 29 (emphasis added). The Commission’s limited review of alternative routes is intended to help the Commission “in reaching a conclusion as to whether the proposed route will, *inter alia*, have minimum adverse environmental impacts.” *Application of Duquesne Light Co.*, 2021 PA. PUC LEXIS 508, *27 (Order entered Oct. 28, 2021).

16. Given the limited scope of the Commission’s review of the Alternative Routes presented in this proceeding, site visits to properties located along these routes are not warranted. The Commission’s minimum adverse impact analysis should be based on testimony and evidence presented by experts qualified to evaluate the environmental impacts of alternative transmission line routes. *See Application of PPL Electric Utils. Corp.*, 2013 Pa. PUC LEXIS 620, *255-56 (Recommended Decision issued Oct. 8, 2013) *adopted by* (Order entered Jan. 9, 2014).

17. The Company also notes that site visits have been requested by several of the active landowner parties that own land along the Proposed Route and are challenging Condemnation Applications. To be clear, the Company does not object to the scheduling, facilitating, and attending of site visits to properties along the Proposed Route. However, at this time, the precise number, location, and time required for these site visits has not been confirmed. Scheduling, facilitating, and attending site visits will require the time and resources of the Commission, landowners, and the other parties to this proceeding. Limiting site visits to landowners who are directly affected by the Proposed Route is reasonable considering the resources required to perform numerous site visits, the uncertainty of the time and resources required to complete the same, and the scope of the Commission’s review in this case.

18. For these reasons, any site visits held in this proceeding should be limited to properties located along the Proposed Route.

Respectfully submitted,



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