

**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 :
New Transmission Line Tap for Future 230 :
kV Double-Circuit Operation; (3) Raise :
Approximately 0.5 Miles of the Sunbury- : Docket No. A-2026-3061547
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 :
Corporation Under 15 Pa.C.S. § 1511(c) For : Docket Nos.
A Finding And Determination That The : A-2026-3061549, A-2026-3061550
Service To Be Furnished By The Applicant : A-2026-3061551, A-2026-3061552
Through Its Proposed Exercise Of The Power : A-2026-3061553, A-2026-3061554
Of Eminent Domain To Acquire Certain : A-2026-3061555, A-2026-3061556
Portions Of Lands In Hazle Township, : A-2026-3061557, A-2026-3061560
Luzerne County, Pennsylvania For The : A-2026-3061561, A-2026-3061562
Sugarloaf 500/230 kV Transmission Line : A-2026-3061564, A-2026-3061566
Associated With The Proposed Sugarloaf : A-2026-3061567, A-2026-3061568
500/230 kV Transmission Line Project Is : A-2026-3061569, A-2026-3061570
Necessary Or Proper For The Service, : A-2026-3061571, A-2026-3061572
Accommodation, Convenience, Or Safety Of : A-2026-3061573, A-2026-3061576

The Public

: A-2026-3061577, A-2026-3061578
A-2026-3061579, A-2026-3061581
A-2026-3061582, A-2026-3061583,
A-2026-3061584, A-2026-3061585

**MEMORANDUM OF JOEL D. AND VICTORIA A. BUTALA
REGARDING SITE VISITS ON ALTERNATE ROUTES**

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

I. INTRODUCTION

1. 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, Joel D. and Victoria A. Butala, pro se Protestants in the above-captioned proceeding ("Protestants"), respectfully submit this Memorandum in support of limiting site visits in this proceeding to properties located along the Proposed Route for the Sugarloaf 500/230 kV Transmission Line Project (the "Project").
2. Protestants join in and adopt the arguments and legal authority set forth in the Memorandum of PPL Electric Utilities Corporation ("PPL Electric") Regarding Site Visits on Alternate Routes, filed July 17, 2026 ("PPL Electric Memorandum"), and write separately to explain their distinct interest, as landowners situated along Alternative Routes B and B1, in ensuring that site visits are not conducted on the Alternative Routes.

II. STATEMENT OF INTEREST

3. Protestants own approximately 18 acres located off Kraska Road, Sugarloaf, Sugarloaf Township, Luzerne County, Pennsylvania, situated along Alternative Routes B and B1 identified in PPL Electric's Siting Application. They have filed a Prehearing Memorandum in this proceeding setting forth their position that the Project is not needed as proposed and that, in the alternative, Alternative Routes B and B1 should not be selected. See Prehearing Memorandum of Joel and Victoria Butala, pp. 1-2.
4. Unlike landowners located along the Proposed Route, Protestants are not currently subject to a Condemnation Application. However, because their property lies along Alternative Routes B and B1, Protestants have a direct and substantial interest in ensuring that the Commission's proceedings do not create the impression that Alternative Routes B and B1 remain under active consideration as viable substitutes for the Proposed Route.

III. SITE VISITS TO PROPERTIES ALONG ALTERNATIVE ROUTES B AND B1 ARE UNWARRANTED

5. As set forth in the PPL Electric Memorandum, the Commission's review in this proceeding is limited to the reasonableness of the Proposed Route, and the transmission line siting process does not permit selection of an Alternative Route absent amendment of the Siting Application and renewed notice to affected landowners. See 52 Pa. Code §

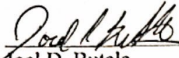
57.75(f); Bd. of Supervisors of Springfield Twp. v. Pa. PUC, 41 A.3d 142, 149-50 (Pa. Cmwlth. 2012).

6. The comparison required by 52 Pa. Code § 57.72(c)(10) — a description of reasonable alternative routes, the corridor planning methodology, and a comparison of the merits and detriments of each route — has already been completed on the existing written record. PPL Electric's Alternatives and Siting Analysis, including its evaluation of Alternative Routes B and B1 against the Proposed Route, is set forth at pages 15 through 24 of the Siting Application. A site visit to Alternative Routes B and B1 would add nothing to a comparison that PPL Electric has already performed and presented, and that no party disputes by seeking the adoption of either route.
7. No party to this proceeding, including Protestants, has advocated for the selection of Alternative Route B or B1 in lieu of the Proposed Route.
8. Conducting site visits to properties along Alternative Routes B and B1 would serve no purpose in aiding the Commission's evaluation of whether the Proposed Route is reasonable, would consume the time and resources of the Commission and the parties without corresponding benefit, and risks creating the misleading impression that Alternative Routes B and B1 are being actively considered as replacements for the Proposed Route when no party has requested that outcome.
9. Extending site visits to publicly owned land along Alternative Routes B and B1 would work a concrete prejudice on Protestants specifically. Protestants' property has not been subject to the notice, hearing, and amendment procedures required by 52 Pa. Code § 57.75(f) that would apply if PPL Electric ever sought to substitute Alternative Route B or B1 for the Proposed Route. Site visits along Alternative Routes B and B1 — conducted under the guise of evaluating the reasonableness of the Proposed Route — would nonetheless generate a record concerning the area in which Protestants' property is located, effectively treating that area as a route under active consideration without affording Protestants the procedural protections the regulations require.
10. Protestants do not oppose the scheduling of site visits to properties located along the Proposed Route and take no position on the specific number, location, or logistics of such visits as requested by other landowners.

IV. CONCLUSION

11. For the foregoing reasons, and for the reasons set forth in the PPL Electric Memorandum, Protestants respectfully request that the ALJs limit any site visits conducted in this proceeding to properties located along the Proposed Route.

Respectfully submitted,


Joel D. Butala


Victoria A. Butala

Victoria A. Butala
260 Mountain Road
Drums, PA 18222
Butala.Joel@yahoo.com
Victoria.Butala@gmail.com
Pro Se Protestants

Date: July 22, 2026

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, with the requirements of 52 Pa. Code § 57.74(b).

VIA EMAIL:

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

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

Jacob Guthrie, Esquire Josiah B. Harmar,
Esquire Melanie Joy El Atieh, Esquire
PA Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
jguthrie@paoca.org
jharmar@paoca.org
melatieh@paoca.org
OCASugarloaf2026@paoca.org

John G. Dean, Esquire
Elliott Greenleaf, P.C.
15 Public Square, Suite 210
Wilkes-Barre, PA 18701
jgd@elliottgreenleaf.com
*Attorney for John F. Zola and Jill M. Zola
and Richard Caputo and Bridget Caputo*

Maryrose E. Babyak, Esquire
Elliott Greenleaf, P.C.

15 Public Square, Suite 210
Wilkes-Barre, PA 18701
meb@elliottgreenleaf.com
*Attorney for John F. and Jill M. Zola and
Richard and Bridget Caputo*

Louise A. Knight, Esquire
36110 Logan Ct., Unit 3B
Camp Hill, PA 17011
attylknight@gmail.com
*Attorney for John F. and Jill M. Zola and
Richard and Bridget Caputo*

Justin P. Richards, Esquire
Elliott Greenleaf, P.C.
15 Public Square, Suite 210
Wilkes-Barre, PA 18701
jpr@elliottgreenleaf.com
*Attorney for Robert J. Pope, Michael F.
Dunleavy, Erika L. and Anthony J. Cook,
Jill Groce, Michael and Deena Berezna,
Mark L. Clark, William J. and Cynthia A.
Tressler, Wendy Larock and Patricia
Kisenwether, Jason and Melissa Ritz, Sugar
Maple Trails, LLC, John G. and Melissa
Kramer, Paul and Mary Malone, Erik D.
and Tiffany M. Sharkey, Jason D. and
Daniel E. Zola, George LaRock and Jane A.
Reakes*