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July 24, 2026

VIA EMAIL

The Honorable Steven K. Haas (sthaas@pa.gov)
The Honorable Emily A. Farren (efarren@pa.gov)
Office of Administrative Law Judge
Commonwealth Keystone Building, 2nd Floor West
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 Eminent Domain To Acquire A Certain Portion Of The Lands of John F. Zola & Jill M. Zola in Sugarloaf 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-**
: **3061555**

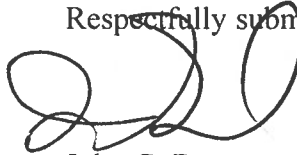
Application of PPL Electric Utilities Corporation Under 15 PA. C.S. 1511(c) For A Finding and Determination That The Service to Be Furnished BY The Applicant Through Its Proposed Exercise of Eminent Domain To Acquire A Certain Portion Of The Lands of John F. Zola & Jill M. Zola in Sugarloaf Township 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-**
: **3061579**

Dear Secretary Homsher:

Enclosed for filing, please find the Memorandum of Protestants John and Jill Zola and Richard and Bridget Caputo in Reply to the Memorandum of PPL Electric Utilities Corporation Regarding Site Visits on Alternative Routes in the above-referenced proceedings.

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

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a series of loops and a final flourish.

John G. Dean

JGD/

cc: Counsel for PPL
Counsel for OCA
Justin P. Richards, Esq.
Glenda Reakes
Joel and Victoria Butala

**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-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;

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**Docket No.
A-2026-
3061579**

**MEMORANDUM OF PROTESTANTS JOHN AND JILL ZOLA
AND RICHARD AND BRIDGET CAPUTO IN REPLY TO THE
MEMORANDUM OF PPL ELECTRIC UTILITIES CORPORATION
REGARDING SITE VISITS ON ALTERNATIVE ROUTES**

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

Protestants John and Jill Zola and Richard and Bridget Caputo (“Protestants”)¹ hereby respond to the memorandum filed by PPL Electric Utilities “PPL” on July 17, 2026, pursuant to the directive of Administrative Law Judges Emily A. Farren and Steven K. Haas (the “ALJs”) at the Prehearing Conference held in these matters on July 10, 2026. The instant issue is whether the ALJs may and should schedule site visits to not only PPL’s preferred route, but also to the two other alternative routes identified by PPL in the underlying siting application.

I. RELEVANT BACKGROUND

Protestants agree with PPL’s recitation of the relevant background (Paragraph’s 1-5 of its Memorandum), except that Paragraph 3 states that “some” of the protests were by individuals who own properties along the Alternative Routes. In fact, only one of the protests has been filed by landowners in that category.

II. SITE VISITS ARE NOT PRECLUDED FROM INCLUDING PROPERTIES ON THE ALTERNATIVE ROUTES CONSIDERED AND PROPOSED BY PPL AND USED TO SATISFY THE PUC’S TRANSMISSION LINE REGULATIONS

The Public Utility Commission’s (“PUC” or “Commission”) transmission line siting regulations are contained at 57 Pa. Code §§ 57.71, et seq. However, the definition of “alternate route” or “alternative route” appears in 52 Pa. Code § 57.1, Definitions. It states as follows: “*Alternate route or alternative route*—A reasonable right-of-way which includes not more than 25% of the right-of-way of the applicant’s proposed route.” 52 Pa. Code § 57.1.

Section 57.72 provides that the Applicant for approval of transmission line shall include:

A general description of reasonable alternative routes to the proposed HV line, including a description of the corridor planning methodology, a comparison of the

¹ There are numerous other protestants to these proceedings who have their own counsel or who are appearing *pro se*.

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). Based on these regulations, PPL included in its underlying siting application two reasonable alternative routes, Alternative Route B and Alternative Route B1, in addition to its preferred and proposed route. PPL now asserts that those reasonable alternative routes should not be viewed.

PPL argues, in part, that the 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.”² That is true, but contrary to PPL’s conclusion that “[t]he transmission line siting process does not contemplate or allow the selection of a new route,” amending the Siting Application if the PUC were to reject PPL’s preferred route in favor of one of PPL’s alternative routes is the very remedy called for by such a decision.

PPL states in Paragraph 16 of its Prehearing Memorandum that the analysis of the alternative routes can simply be done based on testimony and the empirical evidence in their filing. But allowing not only a site visit to PPL preferred route but to PPL’s alternate routes clearly would assist Your Honors as well as ultimately the Commission to have a more robust understanding of all of the routes identified in PPL’s application. And such site visits can do no negative effect to the decision-making process.

² Paragraph 10.

PPL also asserts in Paragraph 13 of its Memorandum that “no party has advocated for the selection of Alternate Routes B or B1 in lieu of the Company’s Proposed Route.” Protestants contest that assertion. In their Prehearing Memorandum, it is set forth, in part, as follows:

John Zola will testify to the effects on his property, interference with the use and enjoyment of his property, the historical significance of the historical significance [sic] of the orchard on his property. He will support the selection of one or more alternative routes.

Mr. Zola could not specify a preferred route at the time of the Prehearing Conference because discovery had just begun. To have espoused at that time a preference for one of the alternative routes proposed by PPL would simply have been premature. Further, in their Addendum to their Prehearing Memorandum, the Protestants also “submit that it is implicit that the public hearings include a site visit to the routes. To be [sic] extent it is not, they vigorously ask for such a site visit.” Protestants clearly have requested that all three alternative routes proposed by PPL be viewed.

PPL includes quotes in its memorandum from both a Commonwealth Court decision as well as several PUC orders purporting to support the proposition that it can satisfy its burden of proof based only on a study which is basically an empirical tabulation of categories itemized in the Commission’s regulations and supported by its fitness statement because the threshold of proof is to provide “sufficient details on the routes that the utility actively considered in the final phase of its route selection process ... [in order] to enable the commission to fully evaluate the reasonableness of the utility’s route selection process.” See, e.g., Re: Interim Guidelines for the Filing of Elec. Transmission Line Siting Applications, Docket No. M-2009-2141293 (Final Order Establishing Interim Guidelines, Nov. 4, 2010, p. 29). But in fact, although the burden of persuasion for a protestant to successfully espouse and convince the Commission that PPL’s

preferred alternative route is unreasonable is substantial, none of the cases proclaim that protestants should be hobbled or precluded from presenting their cases zealously.

In the other cases cited by PPL there is a recognition that a route proposed by the applicant should not be approved “merely because another route might have been adopted.” 2021 PA. PUC LEXIS 50, *31 (Order entered Oct. 28, 2021). None of the cases cited by PPL, however, explicitly confine an analysis of the alternative routes proposed by the utility to only the utility’s preferred route to the exclusion of all those alternative routes having been proposed and considered by that utility. PPL fails to cite to any administrative decision or case that explicitly precludes a view of all or each of its instantly proposed alternative routes. The Protestants’ review, similarly, has yielded no such authority explicitly prohibiting a view of the proposed alternative routes delineated in the very application now before Your Honors. Neither precedent nor other authority has been cited commanding that a protestant’s preferred alternative among the alternative routes presented in the application by PPL should not be given regard. After all, those alternative routes were determined and scrutinized by PPL and should not be viewed now as mere perfunctory tokens offered only to satisfy the regulatory filing requirements imposed upon this applicant.

Pennsylvania regulations establish specific substantive requirements for how a utility must address alternate routes in its siting application. Under 52 Pa. Code § 57.72(c)(10), an application must contain a general description of reasonable alternative routes to the proposed high voltage 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 high voltage line route. 52 Pa. Code § 57.72. At hearings on the siting application, the Commission will accept evidence upon, and in its determination will consider, the availability of reasonable alternative routes. 52 Pa. Code § 57.75. The Commission will not grant the application unless it finds and

determines that the proposed high voltage line will have minimum adverse environmental impact, considering the electric power needs of the public, the state of available technology, and the available alternatives. 52 Pa. Code § 57.76.

The evaluation of PPL's alternate route analysis is governed by a reasonableness standard. Pennsylvania courts have confirmed that the proper inquiry is whether the utility's proposed route is reasonable and whether no alternative route has been shown to be significantly superior to the route selected by the applicant. Paxtowne v. Pennsylvania Public Util. Comm'n, 40 Pa. Commw. 646, 398 A.2d 254 (1979). In Paxtowne, the Commonwealth Court upheld the PUC's finding that no alternative route had been shown to be significantly superior to the route selected by the applicant, and that the applicant's choice of route was made after careful consideration of economics, topographical, environmental, regulation, social, and service factors. See id. Simply put, how can this tribunal determine the foregoing if it precluded from a simple site view. The answer is it cannot. Thus, it begs the simple question "what is PPL trying to shield from the tribunal?" The answer is the unreasonableness of their proposed route.

This standard has been directly applied in PPL siting proceedings. In Southeastern Pa. Transp. Auth. v. PUC, 991 A.2d 1021 (Pa. Commw. 2010), the Commonwealth Court affirmed a PUC order approving PPL's siting application for a seven-mile high-voltage power line where PPL's application provided an in-depth analysis of three proposed routes and concluded that the Coopersburg Line was the best route. Southeastern Pa. Transp. Auth., supra. Similarly, in Board of Supervisors of Springfield Township v. PUC, 41 A.3d 142 (Pa. Commw. 2012), the Commonwealth Court affirmed the Commission's approval of PPL's siting application, with the court recognizing that the substantive standards for approval speak to the need for the high voltage electric transmission line and protection of the environment. Board of Sup'rs of Springfield Twp.

v. Pennsylvania Public Utility Com'n, 41 A.3d 142 (Pa. Commw. 2012). In the Springfield Township case cited by PPL, the Commonwealth Court upheld a Commission decision rejecting a route proposed by the protestants that was not a route proposed by PPL in its application. Thus, Springfield Township is fundamentally distinct, readily distinguishable, and inapposite to a determination on the instant issue in the instant case.

In addition to the requirements set forth at Section 57.75, the PUC's interim guidelines under 52 Pa. Code § 69.3105 further elaborate on what information PPL should provide regarding alternate routes. In providing information regarding reasonable alternative routes that the utility actively considered in its final phase of the route selection process, the applicant should include the environmental, historical, cultural and aesthetic considerations of each route, the proximity of these alternative routes to residential and nonresidential structures, the applicant's consideration of relevant existing rights of way, as well as the comparative construction costs associated with each route. 52 Pa. Code § 69.3105(3). These guidelines supplement the existing regulations under §§ 57.71–57.76 and are intended to ensure that adequate additional information is provided for the efficient and expeditious processing of transmission siting applications. 52 Pa. Code § 69.3101.

The relevant inquiry into the reasonableness of PPL's selection of Alternative Route A is not diminished, but rather is informed, by a consideration of Alternative Route B and/or Alternative Route B1. A comprehensive review of the reasonableness of Alternative Route A—while evaluating the appropriate considerations set forth in the regulations at, inter alia, Sections 57.75 and 69.3105(3)—cannot be had in a vacuum, but rather that the reasonableness of Alternative Route A and its selection by PPL in the underlying application only can be evaluated when compared to and contrasted with the other proposed alternative routes.

There is no basis that either compels Your Honors to reject Protestants' request for a site visit to PPL Alternative Routes B and B1, or suggests that such site visits are inappropriate or disturbing to the development of the evidentiary record. Rather, were Your Honors to scrutinize not one alternative route, but rather all alternative routes, proposed by PPL in its instant siting application, the fullness of the record will be bolstered and the review of Your Honors for reasonableness made comprehensive rather than fragmentary. Protestants therefore renew their request for the site visit planned in the instant case at the Prehearing Conference to include visit to and a view of PPL Alternative Routes B and B1.

Respectfully submitted,

Date: July 24, 2026

A handwritten signature in black ink, appearing to read "Louise A. Knight", written over a horizontal line.

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Date: July 24, 2026

A handwritten signature in black ink, appearing to read "John G. Dean", written over a horizontal line.

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*Counsel for John Zola and Jill Zola and
Richard Caputo and Bridget Caputo*

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be filed electronically on the Commission's electronic filing system and served a true copy of the foregoing document, Memorandum of Protestants John and Jill Zola and Richard and Bridget Caputo in Reply to the Memorandum of PPL Electric Utilities Corporation Regarding Site Visits on Alternative Routes, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), by email upon the persons listed below:

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John G. Dean

DATED: July 24, 2026