

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

August 7, 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

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;

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; and,

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 Black Creek, Hazle, Hollenback, Nescopeck, and/or Sugarloaf Townships, 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
Pennsylvania Public Utility Commission
August 7, 2026
Page 2

Dear Secretary Homsher:

Attached for electronic filing, please find the Renewed Motion for Consolidation of Dockets A-2025-3059443 and A-2026-3061547 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/Olivia Spergel

Olivia M. Spergel

Assistant Consumer Advocate

PA Attorney I.D. # 337929

Email: OSpergel@paoca.org

Enclosures

cc: Administrative Law Judge John M. Coogan (email only:jcoogan@pa.gov)
Administrative Law Judge Emily A. Farren (email only:efarren@pa.gov)
Administrative Law Judge Erin L. Gannon (email only:egannon@pa.gov)
Administrative Law Judge Steven K. Haas (email only:sthaas@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 :

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 : Docket No. A-2026-3061547
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 :

Petition of PPL Electric Utilities :
Corporation For Findings That A :
Structure To Shelter Electrical And :
Control Equipment At The Proposed : Docket No. P-2026-3061609
Nescopeck Switchyard In 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 A Finding And Determination That :
The Service To Be Furnished By The : Docket Nos. A-2026-3061549 *et al*

Applicant Through Its Proposed Exercise :
Of The Power Of Eminent Domain To :
Acquire Certain Portions Of Lands in :
Black Creek, Hazle, Hollenback, :
Nescopeck, and/or Sugarloaf Townships, :
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 :
:

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 Renewed Motion for Consolidation of Dockets A-2025-3059443 and A-2026-3061547 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 7th day of August 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

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

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

John G. Dean, Esq.
Maryrose E. Babyak, Esq.
Elliott Greenleaf, P.C.
15 Public Square, Suite 210
Wilkes-Barre, PA 18701
jgd@elliottgreenleaf.com
meb@elliottgreenleaf.com
*Counsel for Richard and Bridget Caputo; and
John F. and Jill M. Zola*

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: August 7, 2026

Daniel E. Zola, Esq.
Zola Law Offices, Inc.
129 Susquehanna Boulevard
West Hazleton, PA 18202
azola@zolaalaw.com
*Counsel for Jason D. Zola;
and Daniel E. Zola*

John D. Butala
Victoria A. Butala
260 Mountain Road
Drums, PA 18222
victoria.butala@gmail.com
Pro Se

Louise A. Knight, Esq.
3610 Logan Court, Unit 3B
Camp Hill, PA 17011
attylknight@gmail.com
*Counsel for Richard and Bridget Caputo; and
John F. and Jill M. Zola*

Respectfully submitted,

/s/ Olivia M. Spergel
Olivia M. Spergel, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 337929
Email: OSpergel@paoca.org

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

Melanie Joy El Atieh, Esq.
Deputy Consumer Advocate
PA Attorney I.D. # 209323
Email: MElatieh@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 :

Application of PPL Electric Utilities :
Corporation, Filed Pursuant to 52 Pa. :
Code Chapter 57 Subchapter G, for :
Approval to (1) Bifurcate and Rebuild : Docket No. A-2026-3061547
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 :

Petition of PPL Electric Utilities :
Corporation For Findings That A :
Structure To Shelter Electrical And :
Control Equipment At The Proposed : Docket No. P-2026-3061609
Nescopeck Switchyard In 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 A Finding And Determination That :
The Service To Be Furnished By The : Docket Nos. A-2026-3061549 *et al*
Applicant Through Its Proposed :
Exercise Of The Power Of Eminent :
Domain To Acquire Certain Portions Of :
Lands in Black Creek, Hazle, :
Hollenback, Nescopeck, and/or :
Sugarloaf Townships, 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 :

NOTICE TO PLEAD

Per 52 Pa. Code Section 5.103(c), you are hereby advised to file a written response within twenty (20) days to the attached Renewed Motion for Consolidation (Motion) of Dockets A-2025-3059443 and A-2026-3061547 of the Office of Consumer Advocate (OCA) in the above-captioned proceeding. If you do not file a written response to the OCA's Motion, the Administrative Law Judges may rule in favor of the OCA as to the attached Motion.

All pleadings, such as answers to motions, must be filed with the Secretary of the Pennsylvania Public Utility Commission:

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

A copy should also be served on the undersigned counsel, the Administrative Law Judges assigned to this proceeding, and all other parties.

Respectfully submitted,

/s/Olivia Spergel

Olivia M. Spergel
Assistant Consumer Advocate
PA Attorney I.D. # 337929
Email: OSpergel@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: August 7, 2026

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

Melanie Joy El-Atieh
Deputy Consumer Advocate
PA Attorney I.D. # 209323
Email: MEIAtieh@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 :

Application of PPL Electric Utilities :
Corporation, Filed Pursuant to 52 Pa. :
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Approval to (1) Bifurcate and Rebuild : Docket No. A-2026-3061547
4.4 Miles of the Existing Sunbury- :
Susquehanna #1 230 kV Transmission :
Line; (2) Construct 0.9 Miles of New :
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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 :

Petition of PPL Electric Utilities :
Corporation For Findings That A :
Structure To Shelter Electrical And :
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Nescopeck Switchyard In Nescopeck :
Township, Luzerne County, :
Pennsylvania Is Reasonably Necessary :
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Application of PPL Electric Utilities :
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For A Finding And Determination That :
The Service To Be Furnished By The : Docket Nos. A-2026-3061549 *et al*
Applicant Through Its Proposed :
Exercise Of The Power Of Eminent :
Domain To Acquire Certain Portions Of :
Lands in Black Creek, Hazle, :
Hollenback, Nescopeck, and/or :
Sugarloaf Townships, 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 :

RENEWED MOTION FOR CONSOLIDATION OF
DOCKETS A-2025-3059443 AND A-2026-3061547
OF THE OFFICE OF CONSUMER ADVOCATE

AND NOW, before Administrative Law Judges (ALJs) Emily A. Farren, Erin L. Gannon, John M. Coogan, and Steven K. Haas, the Pennsylvania Office of Consumer Advocate (OCA) files this Renewed Motion for Consolidation of Dockets A-2025-3059443 and A-2026-3061547 (Motion), pursuant to 52 Pa. Code Section 5.81. In this Motion, the OCA renews its request that the ALJs enter an order consolidating the above-captioned dockets for adjudication and disposition. Consolidation will aid the Pennsylvania Public Utility Commission (Commission) in resolving common questions of law and fact, reduce public confusion regarding the two proceedings, and promote judicial economy by permitting the ALJs to address these common issues of law and fact in a single proceeding. PPL's responses to discovery requests and Public Input Testimony provided after the ALJs

Order Denying the OCA's initial Motion to Consolidate support consolidation by demonstrating the clear factual overlap between the two proceedings and significant public concern regarding the Commission's separate treatment of these matters. 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 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. The Commission docketed the Phase 1 LON at A-2025-3059443.

According to PPL, it "will carry out the projects necessary to serve this Customer's load request in two separate phases. Phase 1, subject to this [LON], is needed to connect the Customer requesting transmission-level service." Phase 1 LON ¶ 23. Further:

Phase 2 will be needed to address the Customer's future electrical needs and demands, as well as PPL Electric's system needs. Phase 2 will be submitted in a subsequent filing, which PPL Electric anticipates may necessitate a full siting application. PPL Electric notes that the phases are being submitted separately because only the first phase is required to meet the Customer's in-service request; Phase 2 will not be necessary until the Customer's load increases at a future date.

Phase 1 LON ¶ 24.

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 April 7, 2026, PPL submitted a transmission line siting application requesting 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 (Phase 2 Application). The Phase 2 Application is docketed at A-2026-3061547 and is associated with a number of dockets which include applications for Commission authorization for PPL to exercise eminent domain and a zoning petition.¹ In

¹ These docket numbers include: P-2026-3061609, A-2026-3061549, A-2026-3061550, A-2026-3061551, A-2026-3061552, A-2026-3061553, A-2026-3061554, A-2026-3061555, A-2026-

the Phase 2 Application, PPL requested that the Application, as well as the associated condemnation application and zoning petition dockets be consolidated for purposes of hearings and, if necessary, decision. Phase 2 Application ¶ 138.

The Phase 2 Application references the Phase 1 LON in numerous instances, wherein the Phase 1 LON is identified by the docket number provided above. Phase 2 Application at n. 1, 2, 5; Phase 2 Application St. 1 at n. 1, 2, 8; Phase 2 Application St. 2 at n. 1; Phase 2 Application St. 3 at n. 1; Phase 2 Application Attach. 2 at n. 1, 10; Phase 2 Application Attach. 16 at n. 1. As a result, the transmission line siting project identified in the Phase 1 LON as “Phase 2” is that for which PPL is requesting siting approval in the Phase 2 Application.

On April 22, 2026, the Commission issued a Secretarial Letter at the Phase 2 Application docket which enclosed (1) a Notice to be Published, providing that the Phase 2 Application and associated applications and petition would be published in the Pennsylvania Bulletin on May 2, 2026, and establishing a deadline for submission of protests and petitions to intervene of July 3, 2026, and (2) a Telephonic Prehearing Conference Notice, indicating that ALJs Haas and Farren are presiding over the Phase 2 Application proceeding and setting a telephonic prehearing conference date of July 10, 2026, at 10:00 AM.

3061556, A-2026-3061557, A-2026-3061560, A-2026-3061561, A-2026-3061562, A-2026-3061564, A-2026-3061566, A-2026-3061567, A-2026-3061568, A-2026-3061569, A-2026-3061570, A-2026-3061571, A-2026-3061572, A-2026-3061573, A-2026-3061576, A-2026-3061577, A-2026-3061578, A-2026-3061579, A-2026-3061581, A-2026-3061582, A-2026-3061583, A-2026-3061584, A-2026-3061585.

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.

On May 7, 2026, the OCA submitted a Protest and Public Statement to the Phase 2 Application and submitted its Motion for Consolidation of the Phase 1 LON and Phase 2 Application proceedings.

On May 19, 2026, Pro Se Protestant, Erika Cook submitted a Motion to Deny Applications/Petition Without Prejudice, in the Phase 1 proceeding.

On May 27, 2026, PPL submitted its Answer to the OCA's Motion for Consolidation of the Phase 1 LON and Phase 2 Application proceedings.

On June 8, 2026, PPL submitted its Answer to the Motion to Deny Applications/Petition Without Prejudice of Erika Cook.

On June 18, 2026, ALJs Coogan and Gannon issued an Order Denying the OCA's Motion for Consolidation.

On June 23, 2026, ALJs Coogan and Gannon issued an Order denying the Motion to Deny Applications/Petition Without Prejudice filed by Erika Cook.

On June 30, 2026, the Commission held two in-person Public Input Hearings (PIH) in Hazleton, PA.

On July 6, 2026, the OCA submitted a Motion to Leave to Submit Supplemental Direct Testimony in the Phase 1 proceeding, which was granted, in part through ALJs Coogan and Gannon's July 10, 2026 Order.

On July 8, 2026 the OCA submitted its Direct Testimony consisting of OCA Statement 1, the Direct Testimony of Frank Felder, and OCA Statement 2, the Direct Testimony of Rao Konidena.

A Prehearing Conference for the Phase 2 Application proceeding was held on July 10, 2026, during which a litigation schedule was set.

The OCA now submits this Renewed Motion for Consolidation of the Phase 1 LON and Phase 2 Application proceedings.

II. LEGAL STANDARDS

Pursuant to Section 5.81 of the Commission’s regulations, “[t]he Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.” 52 Pa. Code § 5.81. Consolidation is subject to the discretion of the Commission or presiding officers. 66 Pa. C.S. § 331(d). Proceedings can be consolidated for purposes of adjudication, hearing, and briefing. *Re Middletown Taxi Co.*, 50 Pa. PUC 263 (1976); *City of York v. York Tel. and Telegraph Co.*, 43 Pa. PUC 240 (1967); *Clepper Farms, Inc. v. Grantham Water Co.*, 41 Pa. PUC 749 (1965). The Commission has previously declined to grant consolidation where there is no clear relationship between the two matters, the parties and burdens of proof involved are different, and where consolidation “would detrimentally prejudice the [initiating party] and would confuse and obscure the issues” involved. *Dopp v. Williamsburg Borough Dept. of Water and Sewer*, 59 PA PUC 25 (1984).

The OCA, as the party moving for consolidation, bears the burden of proof to establish that the instant matters satisfy the requirements for consolidation. 66 Pa. C.S. § 332(a).

While consolidation requires only that a common question of law or fact exists, the Commission has also enunciated additional considerations that are evaluated in ruling on a motion for consolidation:

1. Will the presence of additional issues cloud a determination of the common issues?
2. Will consolidation result in reduced costs of litigation and decision-making for the parties and the Commission?
3. Do issues in one proceeding go to the heart of an issue in the other proceeding?
4. Will consolidation unduly protract the hearing, or produce a disorderly and unwieldy record?
5. Will different statutory and legal issues be involved?
6. Does the party with the burden of proof differ in the proceedings?
7. Will consolidation unduly delay the resolution of one of the proceedings?
8. Will supporting data in both proceedings be repetitive?

Fergusson v. Aqua Pa. Wastewater Inc., Docket Nos. C-2023-3043108 *et al* (Order Consolidating Complaints issued Nov. 21, 2023) at 2-3 (citing *Applications of Philadelphia Electric Co.*, 43 Pa. PUC 781 (1968); *Pa. PUC v. Bell Tel. Co. of Pa.*, 46 Pa. PUC 568 (1973); *Pa. PUC v. Butler Twp. Water Co.*, 52 Pa. PUC 442 (1978)) (*Fergusson*). As the ALJ in *Fergusson* stated: “No single consideration, nor group of these considerations, is dispositive of a consolidation, any more so than the presence of a common question of law or fact. Rather, the evaluation of all of them and a balancing of those favoring and disfavoring consolidation is required.” *Id.*

The consolidation of the Phase 1 LON and Phase 2 Application for purposes of hearing, briefing, and adjudication is advantageous to the proceedings, in the public interest, and should be granted for the reasons set forth in full below.

III. MOTION FOR CONSOLIDATION

Since the OCA filed its initial Motion for Consolidation of the Phase 1 and Phase 2 proceedings, and the Motion was subsequently denied, additional facts have emerged through discovery and public input hearing testimony that support consolidation and address the concerns identified in the ALJs' Order denying consolidation. Specifically, these facts demonstrate that: (1) consolidation would not circumvent the LON process because it would not require PPL to submit the additional evidence associated with a full siting application under Section 57.72(c), it would still allow sufficient time for the Commission to approve, and for PPL to complete construction of, the Phase 1 transmission line before the customer requires interconnection; (2) separate proceedings are contrary to the public interest and has caused unnecessary public confusion and frustration with the Commission; and (3) Phase 1 and Phase 2 are interdependent.

A. Consolidation preserves the letter of notification process and allows timely construction of the Phase 1 facilities.

In denying the OCA's initial Motion for Consolidation, the ALJs expressed concern that consolidating the Phase 1 LON proceeding with the Phase 2 transmission line siting proceeding would effectively eliminate the abbreviated LON process established by the Commission's regulations. Order Denying OCA Motion for Consolidation at 8. Specifically, the ALJs reasoned that the LON process, provided by 52 Pa. Code Section

57.72(d)(1), is intended to provide an expedited means of approving certain transmission line projects by requiring substantially less information than a full transmission line siting application under 52 Pa. Code Section 57.72(c). *Id.*

Consolidation of the Phase 1 and Phase 2 proceedings, however, would not alter the applicable burden of proof for either project, nor would it require PPL to submit the additional evidence required for a full transmission line siting application under Section 57.72(c). 52 Pa. Code § 57.72(c). Rather the Commission could consider both projects in a single consolidated proceeding while evaluating each project under its respective regulatory standard. Nothing about consolidating the proceedings would require PPL to supplement its Phase 1 LON filing with the additional information required for a full siting application. Instead, the Commission could simply evaluate whether the Phase 1 project satisfies the requirements of Section 57.72(d) while separately determining whether the Phase 2 project satisfies the requirements applicable to a full siting application.

Likewise, the procedural schedules for Phase 1 and Phase 2 could easily be consolidated (by suspending the remainder of the Phase 1 procedural schedule until Phase 2 rebuttal testimony is submitted and aligning the remaining litigation deadlines) and the modest delay would neither prejudice PPL or the Customer nor prevent timely interconnection. Indeed, for any future public input hearings scheduled for these matters, if consolidated, the ALJs would not need to place limitations on the testimony which created confusion during the Phase 1 LON public input hearings. Tr. 75-76, 239-41 (ALJs Coogan and Gannon's instructions regarding the limitation of public input hearing testimony).

Furthermore, as the ALJs recognized in addressing Pro Se Protestant, Erika Cook's Motion to Deny Applications/Petition Without Prejudice, there remains ongoing zoning and land-use litigation concerning the Customer's proposed development. Order Denying Motion to Deny Applications/Petition at 9; *NP Hazleton Holdings, LLC v. The Hazle Twp. Bd. of Spvs.*, Docket No. 2025-13744, Order (Luzerne Cnty. Ct. Com. Pl. May 26, 2026). At the public input hearings in the Phase 1 LON proceeding, witnesses noted that the ongoing land-use litigation is currently before the Commonwealth Court. Tr. 201, 210, 261, 267, 373; *NP Hazleton Holdings, LLC v. The Hazle Twp. Bd. of Spvs. et al*, Docket No. 827 CD 2026 (Pa. Cmwlth., Notice of Appeal filed June 10, 2026). It is unclear whether the appeal can or will be resolved by the close of the record in the Phase 1 LON proceeding on September 18, 2026. Because the Customer's and PPL's ability to proceed with development remains contingent upon the resolution of separate litigation and permitting issues, a consolidated procedural schedule would still provide sufficient time for the Commission to approve, and for PPL to construct, the Phase 1 facilities before the Customer can take service. *Id.*

Accordingly, the ALJs' concern that consolidation would effectively eliminate the streamlined LON process is resolved, and consolidation could still preserve the distinct evidentiary requirements applicable to each project while allowing the Commission to consider the closely related Phase 1 and Phase 2 projects in a single, more efficient proceeding.

B. Maintaining separate proceedings is contrary to the public interest and creates unnecessary public confusion and frustration.

In denying the OCA's initial Motion for Consolidation, the ALJs acknowledged that separate proceedings could create public confusion but ultimately concluded that consolidation itself could also cause confusion because "combining the LON proceeding into Phase 2 risks producing a disorderly and unwieldy record where Phase 2 already contains a number of distinct issues to be evaluated." Order Denying OCA Motion for Consolidation at 8.

Testimony provided by the public during the June 30, 2026 Public Input Hearings demonstrate that the public's concerns are precisely the opposite: maintaining separate Phase 1 and Phase 2 proceedings has created confusion, caused distrust of the Commission's review process, and shown that the two Phases cannot be meaningfully evaluated separately. The following are examples of public testimony that express these concerns:

Maguerite Woelfel testified:

I would say these are not Phase 1 and Phase 2, this is one project because with one you can't have the other.

Phase 1 LON Tr. at 105.

Joel Butala testified:

Now we're just talking about one side of [the Sugarloaf transmission line] as if the other side's not going to come. You have to connect two points, and everything matters in the middle. But we're talking about the far end.

Phase 1 LON Tr. at 248-49.

Todd Eachus testified:

Phase 1, Phase 2, Phase 3, Phase 4, Salem, all these Township projects. Look, you can break this project of any way you have...This is a trick they're running. They can separate this, break this into segments that they know they can manipulate within your Public Utility process and then we don't get to talk about the whole process.

Phase 1 LON Tr. at 167.

Jo-Ann Montes testified:

If the people were fully aware of what's going on, like Phase One, whatever the heck Phase One is, I have no idea. Or Phase Two, I have no idea what that is, because you're using terms that people are not understanding . . .

Phase 1 LON Tr. at 299-300.

These witnesses did not express concern that consolidation would create confusion. Rather, they consistently testified that maintaining separate proceedings obscures the full scope of the Project, makes the proceedings more difficult for the public to understand, and prevents meaningful participation regarding the Project's overall impacts. Accordingly, consolidation better serves the public interest than maintaining separate proceedings and demonstrates to the landowners and community members impacted by the Project that the Commission's review of the Project facilities will be thorough, holistic, and meaningful.

C. Discovery confirms that the Phase 1 and Phase 2 Projects are inextricably interdependent and should be considered together.

One of the reasons the ALJs provided to explain why they denied the OCA's initial Motion for Consolidation was "[a]lthough the customer served by Phase 1 will also be served by Phase 2, PPL averred that the Phase 1 customer will independently require Phase 1 regardless of the outcome of Phase 2." Order Denying OCA Motion for Consolidation at 8-9. However, evidence produced by PPL after the ALJs issued their decision shows that Phase 1 and Phase 2's design are inextricably interdependent. More specifically, PPL's

responses to the OCA's interrogatories confirm that (1) Phase 1 and 2 were designed concurrently, (2) Phase 1's design depends on Phase 2 approval, and (3) the network reliability benefits that PPL attributes to Phase 1, that PPL uses to justify its Phase 1 allocation of costs to ratepayers, depend on the construction of Phase 2. OCA St. 2 at 65-96.²

Although PPL does not directly admit that it designed Phase 1 and Phase 2 concurrently, multiple admissions from PPL's own discovery responses establish such a conclusion as outlined by OCA witness Konidena in his direct testimony:

First, PPL confirmed that the splitting of the Susquehanna-Harwood lines "was designed to allow the future Phase 2 lines to terminate into the Tomhicken Switchyard and Harwood Substation without requiring line crossings"³ and that "the Tomhicken 230 kV Switchyard will have a line termination point for the Phase 2 scope."⁴ The Phase 1 line routing was determined by Phase 2 termination requirements.

Second, PPL confirmed a critical design distinction — while the system network upgrades are based on the Phase 1 DNH load level,⁵ the Tomhicken Switchyard itself was designed to accommodate the customer's ultimate requested load,⁶ not just the Phase 1 DNH load level. This means the switchyard's physical configuration — including its BAAH design, five bays, and line termination points — was sized beyond what Phase 1 alone requires. The Tomhicken switchyard itself was sized to scale Phase 2 even

² The OCA recognizes that the OCA's Direct Testimony has not yet been admitted into the record, but respectfully requests that ALJs Farren, Gannon, Coogan, and Haas consider the OCA's testimony in its determination of whether to Grant this Renewed Motion for Consolidation. This testimony is supported by the Company's filing and facts provided by PPL in Response to OCA's Interrogatories. It is also accompanied by OCA witness Rao Konidena's signed Verification.

³ PPL Response to OCA I-10(c).

⁴ *Id.*

⁵ "The system network upgrades included in the supplemental project are based on the DNH Load Level." PPL Response to OCA V-1(c).

⁶ "The substation was designed to accommodate the customer's ultimate requested load." PPL Response to OCA V-1(c).

though Phase 2, filed at Docket No. A-2026-3061547, has not yet been scheduled for hearing by this Commission.

Third, PPL justified its BAAH configuration over a ring bus by citing nine line terminations — a number that includes Phase 2 lines.⁷ The switchyard's configuration was determined by Phase 2 line count at the time of Phase 1 design.

OCA St. 2 at 71-73. Accordingly, while PPL may avoid characterizing Phase 1 and Phase 2 as formally concurrent, its own discovery responses demonstrate that Phase 1 was planned, routed, and physically configured with Phase 2 requirements already incorporated into the project design.

Similarly, many of the design decisions made in Phase 1 depend on approval of Phase 2 contrary to PPL's statements made in its Answer to OCA's initial Motion to Consolidate. PPL's Answer to OCA's Motion to Consolidate ¶ 48. PPL made the following configurations choices in Phase 1 to accommodate Phase 2 necessities:

- The splitting of the Susquehanna-Harwood lines was designed to allow future Phase 2 lines to terminate into the Tomhicken Switchyard without requiring line crossings. PPL Response to OCA Phase 1 LON Set V-1(b) and (c). The S-H line split is not required if the customer is served from an alternative configuration. PPL Response to OCA Phase 1 LON Set III-8(d).
- The Tomhicken Switchyard was designed to accommodate the Customer's ultimate requested load rather than the Phase 1 DNH load level, and that nine lines will terminate at Tomhicken as part of Phase 1 and Phase 2 combined. PPL Response to

⁷ "The proposed Tomhicken Switchyard is to have nine lines connected as part of Phase 1 and Phase 2." PPL Response to OCA V-4(c).

OCA Phase 1 LON Set V-1(b) and (c); PPL Response to OCA Phase 1 LON Set V-4(c). The line split configuration was designed to allow Phase 2 lines to terminate without line crossings. PPL Response to OCA Phase 1 LON Set I-10(c).

These design decisions made to accommodate Phase 2 have significant cost implications for ratepayers. However, PPL has not conducted any cost analysis to determine the potential savings that could have been achieved if these Phase 2 accommodations had not been incorporated into the Phase 1 design, particularly if Phase 2 is ultimately not approved. OCA St. 2 at 75-80. Rather any analyses that have been conducted to isolate costs between Phase 1 and Phase 2 are entirely inconsistent. For example, OCA witness Konidena explains:

PPL's response to OCA XI-5 identified only a \$120,000 bus-length reduction as the cost attributable to Phase 2 accommodation within the switchyard, while PPL's response to OCA XI-6 implies a \$1.56 million difference between the current design and a Phase 1-only design. PPL has not explained the approximately \$1.44 million gap between these two figures.

OCA St. 2 at 80 (*citing* PPL Response to OCA XI-5(b); PPL Response to OCA XI-6(a)).

Accordingly, PPL's own discovery responses demonstrate that Phase 1 cannot be evaluated in isolation because the project's design choices and associated costs were driven in significant part by the anticipated requirements of Phase 2.

Finally, PPL's discovery responses establish that PPL's claimed Phase 1 network reliability benefits depend on Phase 2 construction. OCA witness Konidena explains as follows:

First and most directly, PPL stated that "[t]he Tomhicken 230 kV Switchyard and additional Phase 2 transmission lines will increase system reliability by adding additional 230 kV paths from the Susquehanna area to

the Hazleton area.”⁸ The conjunction is telling — PPL linked the reliability benefit explicitly to both the switchyard and Phase 2 transmission lines together. The additional 230 kV paths PPL describes do not exist under Phase 1 alone. The Tomhicken Switchyard under Phase 1 is connected to the same Susquehanna-Harwood corridor it replaces — split into two segments but not adding new paths to the network until Phase 2 lines are constructed.

Second, PPL confirmed that the Tomhicken Switchyard “allows for multiple future new transmission electrical paths outside of the current proposed Phase 2 transmission line to be interconnected at Tomhicken”⁹ and “allows for PPL Electric to provide new customer interconnections directly from transmission or indirectly for future load growth via new distribution facilities.”¹⁰ Every system function PPL identifies is forward-looking and contingent on future construction — none is realized under Phase 1 alone.

Third, whether the 700 MVA¹¹ network flow PPL’s Mr. Lookup cited as a ratepayer benefit is attributable to Phase 1 infrastructure alone or assumes Phase 2 is in service in the 2030 RTEP case is examined in the following question. That answer is critical to evaluating whether PPL’s primary quantitative reliability benefit claim survives Phase 1 scrutiny.

Fourth, PPL’s Mr. Lookup identified a 400 MW load threshold at which the new Susquehanna-Tomhicken lines become overloaded under P1/P4 contingency conditions.¹² When asked to explain how this 400 MW threshold compares to the P1 overload threshold on the existing Susquehanna-Harwood lines and to identify the specific engineering differences between the two line segments accounting for any difference, PPL did not provide that comparison. Instead PPL responded that interconnecting at the existing Harwood Substation rather than at the proposed Tomhicken location would allow approximately 70 MW more load before summer emergency ratings are exceeded, due to three additional miles of line impedance at Harwood reducing power flow from Susquehanna.¹³ PPL provided no engineering

⁸ PPL Response to OCA V-5(b).

⁹ PPL Response to OCA III-8(e) Supplemental.

¹⁰ *Id.*

¹¹ PPL Response to OCA III-4(c).

¹² “Specifically, the Susquehanna-Tomhicken #1 and #2 230 kV Transmission Lines become overloaded when the load increases by approximately 400 MW in the Hazleton area. The loss of one of the Susquehanna-Tomhicken 230 kV lines in a single contingency (P1) or multiple contingency with a fault plus stuck breaker (P4) category overloads the remaining in-service line.” Lines 14-18, Page 4, PPL Statement No.1.

¹³ “Interconnecting the load at the Harwood bus results in the system being able to serve an additional ~70MW before the summer emergency ratings of the Susquehanna-Harwood #1 & #2 Transmission Lines are exceeded.” PPL Response to OCA VI-1(d).

explanation for why the new S-T lines have a 400 MW P1 normal rating threshold or how that threshold relates to the existing S-H line configuration. The absence of this explanation means the record contains no basis for evaluating whether the 400 MW Phase 2 trigger is a consequence of Phase 1 design choices or an independent system reliability constraint — a distinction directly relevant to whether Phase 2 costs should ultimately be attributed to this customer's load growth or to an independent system need.

OCA St. 2 at 82-83.

OCA witness Konidena further provides testimony explaining that Phase 1 as proposed by PPL, already exceeds the thresholds that trigger Phase 2 and that every function PPL identifies as a ratepayer benefit from Phase 2 exists solely because of the Customer's load. He explained that Phase 1 "leaves only 12 to 15 months between Phase 1's commercial operation and the first overload." OCA St. 2 at 84-85. Mr. Konidena testified that according to PPL's Responses to discovery requests, this issue "was known at the time Phase 1 was designed" and PPL admitted "that Phase 2 exists to serve this customer, not to provide independent benefits to existing ratepayers." *Id.*

Consequently, the system benefits PPL relies upon to justify assigning Phase 1 costs to ratepayers are inextricably tied to the construction and operation of Phase 2. PPL contends that Phase 1 will provide system benefits that justify assigning \$38.4 million of Phase 1 costs to ratepayers. LON ¶ 39. However, those claimed benefits will not be fully realized unless Phase 2 is subsequently approved and constructed. If Phase 2 is never approved, ratepayers will nevertheless have paid \$38.4 million for infrastructure that PPL has not demonstrated will provide the benefits upon which its cost allocation is based. Under these circumstances, the Commission cannot conduct a complete and informed

evaluation of the reasonableness of the Phase 1 cost allocation without simultaneously considering Phase 2.

Additionally, the total ratepayer exposure associated with PPL's proposed transmission solution is approximately \$156.9 million across both phases. OCA Statement 2 at 92. Evaluating only the Phase 1 allocation without simultaneously considering the Phase 2 costs and allocation asks the Commission to approve one portion of an integrated project without understanding the full extent of the financial obligation ultimately imposed on ratepayers and, thereby, whether the projects are needed and/or in the public interest. 52 Pa. Code §§ 57.72(d)(5), 57.75(e)(1), 57.76(a)(1). The Commission should, therefore, require that the two proceedings be evaluated together to ensure that PPL's claimed network reliability benefits and associated costs imposed on ratepayers are supported by a complete evidentiary record.

IV. CONCLUSION

Since the OCA filed its initial Motion for Consolidation of the Phase 1 and Phase 2 proceedings, and the Motion was subsequently denied, additional facts have emerged through discovery and the Public Input Hearings that not only support consolidation but also directly address the concerns identified in the ALJs' Order denying the initial motion. Based on the statements provided by the landowners and community members affected by the Project, in addition to the evidence adduced through discovery, the OCA respectfully requests that the Commission reconsider whether the Phase 1 LON and Phase 2 Application should be consolidated.

Consolidation would not circumvent the Letter of Notification process because it would not require PPL to submit the additional evidence associated with a full siting application under 52 Pa. Code Section 57.72(c). Moreover, the record establishes that sufficient time remains for the Commission to adjudicate a consolidated proceeding and for PPL to construct the Phase 1 transmission line before the customer requires interconnection. Public input hearing testimony and discovery further demonstrates that maintaining separate proceedings has caused unnecessary public confusion, that Phase 1 and Phase 2 are functionally and economically interdependent, and that the reasonableness of Phase 1 cannot be fully evaluated without simultaneously considering Phase 2.

Because these proceedings involve common questions of law and fact concerning the interconnection and service needs of a single large load customer, are governed by the same legal standards, and require proof from the same applicant, consolidation will promote judicial economy by eliminating duplicative testimony and evidence, reducing the

administrative burden on the Commission, and ensuring a complete and consistent evidentiary record. Any modest adjustment to the procedural schedule is outweighed by the substantial benefits of a comprehensive review of PPL's proposed transmission projects and a single, coordinated determination regarding the costs and impacts borne by ratepayers and the public. Accordingly, the OCA respectfully requests that the Commission grants this Motion.

Respectfully submitted,

/s/Olivia Spergel

Olivia M. Spergel
Assistant Consumer Advocate
PA Attorney I.D. # 337929
Email: OSpergel@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

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

Melanie Joy El-Atieh
Deputy Consumer Advocate
PA Attorney I.D. # 209323
Email: MElAtieh@paoca.org