

Via Electronic Mail Only

August 12, 2026

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

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

Dear Secretary Homsher,

I, Erika Cook, pro se Protestant, respectfully submit a Renewed Motion to Deny the Application (LON) Without Prejudice or Stay the Application (LON) until the land-use conflict litigation is resolved in a manner that satisfies all Commission requirements.

Thank you for your time and attention regarding my filing. If you have any questions, please kindly reach out to me.

Respectfully,



Erika Cook
38 Red Rock Road
Sugarloaf, PA 18249
elcook33@gmail.com
570-233-8205

Enclosures

Matthew L. Homsher, Secretary

May 19, 2026

cc: The Honorable Erin L. Gannon (w/enclosures; via email)

The Honorable John Coogan (w/enclosures; via email)

Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I, Erika Cook, Pro Se Protestant, have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, Renewed Motion to Deny the Application (LON) Without Prejudice or Stay the Application (LON) until the land-use conflict litigation is resolved in a manner that satisfies all Commission requirements, upon parties of record in this proceeding Docket No. A-2025-3059443 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 12th day of August 2026.

VIA E-MAIL

Jacob Guthrie (JGuthrie@paoca.org)

Olivia M Spergel (OSpergel@paoca.org)

Melanie Joy El Atieh (melatieh@paoca.org)

PA Office of Consumer Advocate

555 Walnut Street, 5th Floor Forum Place, Harrisburg, PA 17101-1923

(Counsel for OCA)

Michael J Shafer (mjshafer@pplweb.com)

David B. MacGregor, Esq. (dmacgregor@postschell.com)

Garrett P. Lent, Esq. (glent@postschell.com)

Hayley E. Wilburn, Esq. (hwilburn@postschell.com)

Lindsay A. Berkstresser (lberkstresser@postschell.com)

Megan E Rulli (mrulli@postschell.com)

Post & Schell, P.C.

17 North Second Street, 12th Floor, Harrisburg, PA 17101

(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

570-233-8205

August 12, 2026

Docket No. A-2025-3059443

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	:	A-2025-3059443
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	:	

Renewed Motion to Deny the Application (LON) Without Prejudice or Stay the Application (LON) until the land-use conflict litigation is resolved in a manner that satisfies all Commission requirements

This Renewed Motion to Deny the Application (LON) Without Prejudice or Stay the Application (LON) until the land-use conflict litigation is resolved in a manner that satisfies all Commission requirements is based on the denial of the land-use appeal in Luzerne County Court of Common Pleas, Case # 202513744. The fundamental right to develop the site itself is the core of the issue. Because the Project's underlying land-use development application does not have land use approval and will not for the foreseeable future, moving forward with this LON is premature, poses a risk of regulatory conflict, and fails to meet the Commission's statutory and regulatory prerequisites. Denying or Staying the LON will conserve all Parties' and the Commission's resources in further review of the LON.

I. Background

1. On November 14, 2025, the Hazle Township Board of Supervisors (BOS) denied NP Hazleton Holdings 1, LLC's land development plan.
2. On December 12, 2025, NP Hazleton Holdings 1, LLC ("NorthPoint") filed a lawsuit appealing the land development plan denial for the proposed project site.

3. On December 19, 2025, PPL Electric filed a Letter of Notification of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Phase 1: 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 (hereinafter, the "Letter of Notification"). As noted by the OCA in their Motion for Consolidation, page 3:

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 inservice request; Phase 2 will not be necessary until the Customer's load increases at a future date. Phase 1 LON ¶ 24.

4. On March 12, 2026, I, Erika Cook, pro se Protestant, filed a Protest to the Phase 1 LON.
5. On March 13, 2026, John Zola filed a Protest to the Phase 1 LON.
6. On March 18, 2026, ALJs Gannon and Coogan convened a Prehearing Conference regarding the Phase 1 LON.
7. On April 7, 2026, PPL submitted a transmission line siting application for Phase 2 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 Applicant's proposed project and routing are contingent upon local zoning, land use, and property rights.
8. On May 7, 2026, the OCA submitted a Protest and Public Statement to the Phase 2 Application and a Motion for Consolidation of the Phase 1 LON and Phase 2 Application proceedings.
9. On May 13, 2026 PPL Electric filed its Direct Testimony for Phase 1 Docket A-2025-3059443 with the PUC.

10. On May 19, 2026, I, Erika Cook, pro se Protestant, submitted this Motion to Deny the Applications/Zoning Exemption Petition Without Prejudice.
11. On May 26, 2026, Luzerne County court denied the land use appeal by NP Hazleton Holdings 1, LLC in Case # 202513744 remanding the matter to the Hazle Township Zoning Hearing Board for special exception or NP Hazleton Holdings 1, LLC was permitted to challenge the validity of the Hazle Township Zoning Ordinance.
12. 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.
13. On June 8, 2026, the Hazle Township Board of Supervisors adopted Resolution 2026-16:

RESOLUTION #2026-16

HAZLE TOWNSHIP, LUZERNE COUNTY, PENNSYLVANIA

A Resolution of the Hazle Township Board of Supervisors declaring portions of the Hazle Township Zoning Ordinance to be Substantively Invalid, Specifying Specific Findings Regarding the Reasons for the Declared Invalidity, and Implementing a Limited Moratorium of 180 Days from the Date of this Resolution to Adopt a Municipal Curative Amendment to Cure the Declared Invalidity by Addressing Data Centers and Data Center Accessory Uses in the Hazle Township Zoning Ordinance

14. On June 8, 2026, PPL submitted its Answer to the Motion to Deny Applications/Petition Without Prejudice of Erika Cook.
15. On June 10, 2026, NP Hazleton Holdings 1, LLC appealed the land use denial issued by Luzerne County to the Commonwealth Court of Pennsylvania.
16. On June 18, 2026, ALJs Coogan and Gannon issued an Order Denying the OCA's Motion for Consolidation.
17. On June 23, 2026, ALJs Coogan and Gannon issued an Order denying the Motion to Deny Applications/Petition Without Prejudice filed by Erika Cook.
18. On June 30, 2026, the Commission held two in-person Public Input Hearings (PIH) in Hazleton, PA.
19. 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.

20. Only July 8, 2026, I, Erika Cook, pro se Protestant, submitted my Direct Testimony.
21. 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.
22. On August 7, 2026, the OCA submitted its Renewed Motion for Consolidation of the Phase 1 LON and Phase 2 Application proceedings.
23. On August 7, 2026, PPL submitted its Rebuttal Testimony consisting of:
 - PPL Electric Statement No. 1-R – Rebuttal Testimony of Joseph Lookup
 - PPL Electric Exhibit JBL-1R
 - PPL Electric Statement No. 2-R – Rebuttal Testimony of Kyle Swartzentruber
 - PL Electric Statement No. 3-R – Rebuttal Testimony of Peter Sparhawk
 - PPL Electric Statement No. 4-R – Rebuttal Testimony of Chad Huber
 - PPL Electric Statement No. 5-R – Rebuttal Testimony of John D. Taylor
 - PPL Electric Exhibits JDT-1R
 - PPL Electric Statement No. 6-R – Rebuttal Testimony of Bethany L. Johnson
 - PPL Electric Exhibits BLJ-1R through BLJ-3R
24. On August 12, 2026, I, Erika Cook, pro se Protestant, submit my Renewed Motion to Deny the Application (LON) Without Prejudice or Stay the Application (LON) until the land-use conflict litigation is resolved in a manner that satisfies all Commission requirements.

II. Grounds for Denial Without Prejudice

A. The Application (LON) is Premature and Fails to Comply with Applicable Law

To approve the requested LON, the Commission must find that the project complies with all applicable state and local laws. In her opening statement at both of the Public Input hearings on June 30, 2026, Counsel Hayley Wilburn from Post & Schell representing PPL, introduced the Project by stating “The Project is under 2 miles in length and is located within existing transmission line right of way and/or land owned by PPL Electric and the Customer to be served”. The land Counsel Wilburn is referring to is owned by NP Hazleton Holdings 1, LLC as depicted in Figure 3-1 Aerial Map included in the LON. Based upon her statement and Figure 3-1, it can be assumed that the ‘Customer to be served’ at this time is NP Hazleton Holdings 1, LLC. Because the Property Owner, determined to be NP Hazleton Holdings 1, LLC,

was denied their appeal in Luzerne County and is currently appealing their land-use rights in the Commonwealth Court of Pennsylvania, the Applicant cannot definitively establish compliance with local ordinances or environmental regulations. Under 52 Pa. Code §§ 57.72 (14) the application must include a statement identifying litigation concluded or in progress which concerns property or matter relating to the proposed HV line, right-of-way route or environmental matters. Such a statement has not been provided by the Applicant as of this time.

The core issue in that litigation is highly material to the Commission's review of the LON - specifically, the fact that the land development plans were denied as stated in the BOS denial letter to NP Hazleton Holdings 1, LLC:

*"The Preliminary Major Land Development Plans for Project Hazelnut and Final Plans of NP Hazleton Holdings 1, LLC (the "Applicant") for Phase I of the Development and Preliminary/Final Land Development Plans for Project Hazelnut-North Park Drive Extension and Grassy Path Road are **DENIED**. The proposed Industrial Technology Campus with 15 data center buildings and four ancillary buildings on the property located at 2500 North Park Drive, Hazle Township, PA ("Property") is not permitted in the Industrial (I-1) and Conservation (C-1) Zoning Districts (with the project area located in the I-1 Zoning District). Section 802(F) of the Hazle Township Subdivision and Land Development Ordinance ("SALDO") requires that the proposed land use conform to the Hazle Township Zoning Ordinance ("Zoning Ordinance"). In addition, Section 816.1 of the SALDO requires the plans to meet the relevant standards of the Zoning Ordinance."*

As I noted above in section I. Background, page 6, ¶ 11, Judge Gelb remanded the issue back to Zoning for special exception or NP Hazleton Holdings 1, LLC could challenge the validity of the Township's ordinance. NP did not challenge the ordinance and Hazle Township enacted a municipal curative amendment giving them 180 days from June 8, 2026 to cure their ordinance. I have included the Order issued on May 26, 2026 by the Honorable Lesa Gelb as Exhibit 1 to be entered as part of the record.

On August 11, 2026, PUC Administrative Law Judges Emily A. Farren and Steven K. Haas issued Interim Order #10, Staying Proceeding, in PUC Docket Number A-2026-3059809. This application in front of the PUC is submitted by Greater Hazleton Community Area New Development Organization Inc. t/a CAN DO, INC. to provide service to an approximately 1,345 acre parcel of land owned by NP Hazleton Holdings 1, LLC for a data center campus. According to the Order:

“As to land use approval of NP Hazleton’s desire to erect a data center, on June 24, 2026, Ms. Logan filed direct testimony, which included several exhibits. Turning to the exhibit pre-marked as Exhibit 2, is an Order of Luzerne County Court of Common Pleas, dated May 26, 2026, denying the Land Use Appeal filed by NP Hazleton Holdings 1, LLC, against Hazle Township Board of Supervisors, at Docket No. 2025-13744. Although exhibits attached to preserved written testimony, in the ordinary course of Commission proceedings are not considered evidence unless and until moved into the record at an evidentiary hearing or by stipulation of the 10 parties, we may, and do so here, take judicial notice of the existence of the docket and the procedural status therein. We further take judicial notice of the Notice of Appeal filed by NP Hazleton Holdings 1, LLC, v. Hazle Township Board of Supervisors, in the Commonwealth Court of Pennsylvania, at Docket No. 827 CD 2026. The Notice of Appeal was filed on June 10, 2026.

Disposition

Given the ongoing land use litigation before the Commonwealth Court and the uncertainty surrounding the denial or approval of NP Hazleton’s land development plan, we find it prudent to conserve the parties’, as well as the Commission’s, resources in any further review of the instant Application. Thus, until CAN DO is able to show the need for water service to the Requested Service Territory is a present need, we determine that it is necessary to stay this proceeding and suspend the litigation schedule.”

Although the CAN DO docket is regarding water service, the same logic regarding land use approval can be applied to the Phase 1 LON at hand here. It is prudent to conserve all Parties’ and Commission’s resources in any further review. At this time, there is only 1 Customer under an Electric Service Agreement that is proposed to utilize the Phase 1 and Phase 2 facilities and that Customer does not have approval to move forward. I refer to PPL Answer to OCA Interrogatory X-3:

A. The existing new large load customer under Electric Service Agreement that is proposed to utilize the Phase 1 and Phase 2 facilities have an estimated maximum peak demand shown below:

- *Customer 1 965 MW’s.*

The lines support future customer growth for future proposed customer growth.
Additional large load customers may utilize the line under abnormal or contingency scenarios.

According to the LON Direct Testimony of Joseph Lookup dated 5/13/2026, page 5:

Q. If the Customer does not complete the development of their facility is the Project still needed?

A. Potentially. The Tomhicken Switchyard is designed to eventually serve multiple customers. The current Customer is the farthest along the development process amongst those customers, and is the need driver

for this Letter of Notification. However, as mentioned in the Company's filing, there is other load growth in the Hazleton area that this project will support. The Company is confident that there is load growth in the area from the Customer and other customers to support the Project.

And page 6:

Q. Would the Company commit to not building the Project if there was no longer a need for it?

A. Yes. The Company is not in the business of building transmission lines to nowhere that serve no purpose. PPL Electric coordinates with potential customers as their development progresses to align construction activities. This involves the customer and PPL Electric pursuing parallel approval paths in the interest of meeting customer schedules. However, the Company filing this LON prior to the customer receiving final approvals for their development does not mean that the Company will continue development of the Project if the need disappears. That being said, it is anticipated that the Project will support load growth other than the customer's service request, which justifies the need for the Project.

If the Tomhicken Switchyard will be located on privately owned property as stated by Counsel Wilburn at the Public Input Hearings - property that is owned by NP Hazleton Holdings 1, LLC - how will this Project be able to provide power to other "potential customers" if the property and switchyard do not get developed? These statements indicate it will "eventually" serve multiple customers and "anticipates" there is potential for load growth but do not provide any confirmed projects. These hypothetical scenarios should not be sufficient grounds for approval of the LON at this time. Following precedent in the CAN DO case, I ask your Honors to consider whether this LON should continue to move forward at this time.

I would like to reiterate PPL's Answer to OCA Interrogatory I-3 d in Phase 1:

The following Supplemental projects were presented as network upgrades for the PJM TEAC to support this initial Customer's interconnection request:

- i. Nescopeck 230kV Switchyard: Install a new three bay BAAH 230kV switchyard.*
- ii. Harwood 230kV Substation: Install new line terminal in the Harwood 230kV switchyard, install one dead-end, two breakers, and associated equipment. New bay to be DBDB initial and future BAAH.*
- iii. Sunbury-Susquehanna # 1 230kV Transmission Line: Bifurcate the Sunbury-Susquehanna #1 230kV Transmission Line into the new Nescopeck 230kV switchyard. Extend lines approximately 0.2 into the new Nescopeck 230kV Switchyard.*
- iv. Sunbury-Susquehanna # 1 230kV Transmission Line Partial Rebuild: Rebuild the SunburySusquehanna # 1 230kV Transmission Line to double circuit 230kV operation for approximately 3.9 miles from the Susquehanna 230kV Switchyard to the new Nescopeck 230kV Switchyard.*

v. *Susquehanna 230kV Switchyard: Install a new line terminal at Susquehanna 230kV Switchyard by installing new dead-end, 230kV breaker, and associated equipment.*

vi. *Nescopeck-Tomhicken 230kV Transmission Line: Extend a double circuit 230kV (built for 500kV) for ~9 miles from Nescopeck to Tomhicken within existing PPL ROW. Extend a single circuit 230kV (built for 500kV double circuit operation) for approximately 2.7 miles from the Tomhicken Switchyard to the Harwood Substation. This will create the Nescopeck - Tomhicken 230kV and Nescopeck-Harwood 230kV Transmission Lines.*

The estimated cost of the Supplemental projects is approximately \$212.3 million. The anticipated in-service date for the Supplemental projects is November 2028. PPL Electric will seek all applicable PUC siting approvals for these projects.

The above-listed projects are needed to serve the Customer's load, and is not indicative of other future projects that will be needed to serve other load growth in the area.

The above-listed projects are referring to all of the projects housed within Phase 2, the Siting Application Docket A-2026-3061547. This entire Project, Phase 1 and Phase 2 - both part of the same PJM Supplemental Project s3528, is indicated to be for a single Customer by PPL's own admission and the entire Project should not continue to move forward until the land-use issue is resolved at best.

In addition, Hazle Township's SALDO ordinance states that approval must be granted before infrastructure can be constructed. No on-lot building construction activities including earthmoving activities can be done without the proper approval, this would include the installation of 100-140 foot tall steel monopole transmission lines, switchyard and a substation.

Hazle Township's Subdivision and Land Development Ordinance, Article 3, page 3-14:

SECTION 312 COMMENCEMENT OF DEVELOPMENT AND PERMITS

A. Infrastructure may be constructed once preliminary approval has been granted and all outside agency permits that relate to construction are obtained. If a plan is granted preliminary approval with conditions by the board, infrastructure may not be constructed until all conditions of the approval have been met by the applicant. No on-lot building construction activities (including earthmoving activities, but not including soil or percolation testing or surveying activities) shall begin until the Township Zoning Officer has received a copy of the Recorder of Deeds' receipt for recording of the final plan, or a building or driveway permit has been issued.

B. Denial Without Prejudice Prevents Regulatory Conflict

Dismissing or denying the LON with prejudice would permanently bar the Applicant from seeking this relief, even if they eventually prevail in the pending land-use litigation. However, denying the LON without prejudice achieves two necessary goals:

1. It clears the Commission's docket of a contingent, unripe matter.
2. It preserves the Applicant's right to refile their application if, and when, the Project's land-use litigation is resolved in a manner that satisfies all Commission requirements.

Pennsylvania courts have repeatedly emphasized the importance of coordinated and orderly land-use planning. The LON appears inconsistent with existing municipal planning, zoning, and infrastructure approvals, and may conflict with ongoing regulatory reviews. If the Commonwealth Court of Pennsylvania appeal is denied, there will be no need for this 1.1 mile transmission line, switchyard or substation. There will also not be a need for Phase 2 as noted by the OCA in their Motion for Consolidation, page 9:

“The Phase 1 LON requests authorization to construct the facilities required to interconnect a large load, data center customer. Phase 1 LON ¶ 10. The Phase 2 Application requests authorization to construct the facilities required to serve that same large load, data center customer over the next several years. Phase 2 Application ¶¶ 21, 24. While PPL pleads that other data center customer interconnections require the facilities proposed in the Phase 2 Application, the load growth of the data center customer interconnecting to the Phase 1 LON facilities is sufficient alone to require the Phase 2 facilities to avoid reliability violations. Phase 1 LON ¶ 24 (“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 Application ¶¶ 25-26.”

C. No Prejudice to the Applicant

A denial without prejudice will not cause legal prejudice to the Applicant. The Applicant will not be barred from re-petitioning the Commission once the judicial determination regarding their land-use conflict has been rendered. Conversely, granting the LON while parallel land-use litigation is ongoing risks substantial administrative waste and contradictory regulatory rulings. The Hazle Township BOS denied NP Hazleton Holdings 1 LLC’s development plan on November 14, 2025. NP Hazleton Holdings 1 LLC filed an appeal on this decision on December 12, 2025 and that was denied by Luzerne County. The case is currently in front of the Commonwealth Court of Pennsylvania with no estimated resolution date. At the very least, granting a Stay of this Application pending the land use approval, as was issued in Docket

A-2026-3059809 Interim Order #10, will allow time for the Commonwealth to determine if the appeal will advance.

III. Conclusion and Request for Relief

WHEREFORE, for the foregoing reasons, I, Erika Cook, pro se Protestant, respectfully requests that the Commission enter an Order:

- Denying PPL Electric's application (LON) without prejudice;
- Allowing the Applicant to refile the application (LON) if the Project's pending land-use litigation is resolved in a manner that satisfies all Commission requirements; or
- Stay the Application (LON) until the land-use conflict litigation is resolved in a manner that satisfies all Commission requirements; and
- Granting such other and further relief as the Commission deems just and proper.

Respectfully,



Erika Cook
38 Red Rock Road
Sugarloaf, PA 18249
elcook33@gmail.com
570-233-8205

VERIFICATION

I, Erika Cook, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: August 12, 2026



Erika Cook, Pro Se Protestant