
Garrett P. Lent

glent@postschell.com
717-612-6032 Direct
717-731-1985 Direct Fax
File #: 209803

September 1, 2026

VIA ELECTRONIC FILING

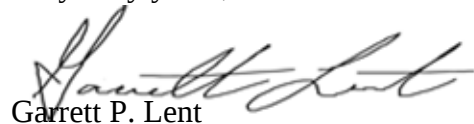
Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Letter Of Notification Of PPL Electric Utilities Corporation, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For Approval To Rebuild 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:

Attached for filing is the Answer of PPL Electric Utilities Corporation ("PPL Electric") to the Renewed Motion to Deny Applications/Petition Without Prejudice of Erika Cook in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Very truly yours,



Garrett P. Lent

GPL/bfc
Attachment

cc: The Honorable Erin L. Gannon (*via email; w/attachment*)
The Honorable John Coogan (*via email; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 57.72(d)(3).

VIA E-MAIL

Jacob Guthrie
Josiah B. Harmar
Melanie Joy El Atieh
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
(Counsel for OCA)

Erika Cook
38 Red Rock Road
Sugarloaf, PA 18249
Elcook33@gmail.com

John Zola
17 Dagostin Road
Sugarloaf, PA 18249
zolajj@gmail.com

Dated: September 1, 2026



Garrett P. Lent

**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 : 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 to the :
New Tomhicken 230 kV Switchyard that :
are Respectively Located in Luzerne :
County, Pennsylvania :

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO THE RENEWED
MOTION TO DENY APPLICATIONS/PETITION WITHOUT PREJUDICE OF ERIKA
COOK**

TO ADMINISTRATIVE LAW JUDGES ERIN L. GANNON AND JOHN M. COOGAN:

Pursuant to Section 5.61 of the Pennsylvania Public Utility Commission's ("Commission") regulations,¹ PPL Electric Utilities Corporation ("PPL Electric" or the "Company") hereby files this Answer to the Renewed Motion to Deny the Application (LON) Without Prejudice or Stay the Application (LON) ("Renewed Motion" or "Renewed Motion to Deny") of Erika Cook dated August 12, 2026. In her Renewed Motion to Deny, Ms. Cook avers that the above-captioned proceeding should be denied without prejudice so that other active land-use and zoning litigation between NP Hazleton Holdings 1, LLC and the Hazle Township Board of Supervisors that is

¹ 52 Pa. Code § 5.61

currently pending in Luzerne County Court of Common Pleas may be fully resolved.² For the reasons explained herein, Ms. Cook’s Motion should be denied.

I. PROCEDURAL BACKGROUND

1. The proceeding at Docket No. A-2025-3059443 (“Letter of Notification”) was initiated on December 19, 2025, when PPL Electric filed the above-captioned “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 to Connect the Existing Susquehanna-Harwood #1 & #2 Transmission Lines to the New Tomhicken 230 kV Switchyard that are Respectively Located in Luzerne County, Pennsylvania” (hereinafter, the “Letter of Notification”) with the Pennsylvania Public Utility Commission (“Commission”). In the Letter of Notification, PPL Electric requested Commission approval to build approximately 1.1 miles of new double-circuit 230 kilovolt (“kV”) transmission taps (“Tap Lines”) that are needed to connect the existing Susquehanna-Harwood #1 and #2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard (“Tomhicken Switchyard”). The Project also includes the construction of two new 0.1-mile-long 230 kV transmission lines (“Connecting Lines”) from the Tomhicken 230 kV Switchyard to a new customer-owned 230-34 kV substation. The new 230 kV Connecting Lines, Tap Lines, and Tomhicken 230 kV Switchyard (together, the “Tomhicken 230 kV Switchyard Project”) are located in Hazle Township, Luzerne County, Pennsylvania.

2. PPL Electric filed the Letter of Notification pursuant to the provisions of 52 Pa Code § 57.72(d)(iii) and (vi), which provide that an LON may be file with the Commission in lieu

² PPL Electric notes that Ms. Cook is not a party to the Full Siting Application at Docket No. A-2026-3061547. However, to the extent that the Motion is construed as requesting that the Full Siting Application and associated Eminent Domain Applications be denied as well, that request should also be denied.

of a full siting application where the HV line is located entirely within existing transmission line ROW and within the property of the sole customer to be served by the line so long as the ROW will not be substantially altered, and where the HV line has a proposed route of 2 miles or less, respectively.

3. On December 30, 2025, OCA filed a Notice of Intervention and Public Statement.
4. On January 7, 2026, the OCA filed a Protest.
5. On March 12, 2026, Erika Cook filed a Protest.
6. On March 13, 2026, John Zola filed a Protest.
7. On March 20, 2026, a Scheduling Order was issued, which, in part, adopted a procedural schedule for the Letter of Notification proceeding.
8. On March 24, 2026, an In-Person Evidentiary Hearing Notice was issued, setting the hearing in the above-captioned matter for Thursday, September 17 and Friday, September 18, 2026 at 10:00 AM.
9. On May 7, 2026, OCA filed its first Motion to Consolidate.
10. On May 13, 2026, PPL Electric filed its direct testimony in the Tomhicken 230 kV Switchyard Project proceeding, consisting of PPL Electric Statement Nos. 1-4.
11. On May 19, 2026, Erika Cook filed a Motion to Deny the Pending Applications and Zoning Exemption Petition Submitted by PPL Electric Without Prejudice (“first Motion to Deny”).
12. On May 27, 2026, PPL Electric filed its Answer to OCA’s first Motion to Consolidate.
13. On June 8, 2026, PPL Electric filed its Answer to Erika Cook’s first Motion to Deny Applications/Petition Without Prejudice.

14. On June 18, 2026, OCA's first Motion to Consolidate was denied.
15. OCA did not seek interlocutory review of the denial of its first Motion to Consolidate.
16. On June 23, 2026, Erika Cook's Motion to Deny Applications/Petition Without Prejudice was denied.
17. Erika Cook did not seek interlocutory review of the denial of her first Motion to Deny.
18. On June 30, 2026, public input hearings were held in Hazleton, PA.
19. On July 8, 2026, the active parties submitted their Direct Testimony.
20. On July 15, 2026, OCA submitted Supplemental Direct Testimony pertaining to public input hearing testimony.
21. On August 7, 2026, PPL Electric submitted its Rebuttal Testimony.
22. Also on August 7, 2026, OCA filed its Renewed Motion for Consolidation.
23. On August 12, 2026, Erika Cook submitted the Renewed Motion to Deny the Application (LON) Without Prejudice or Stay the Application (LON).
24. The Tomhicken 230 kV Switchyard Project is the first project of two that will be needed to serve new and future load within the area in which it will be constructed. The Tomhicken 230 kV Switchyard Project is referred to as "Phase 1" of these two projects. It is needed forthwith to interconnect a customer requesting transmission-level service in Hazle Township, Luzerne County, Pennsylvania to the 230 kV system.

II. LEGAL STANDARD

25. As acknowledged by the Commission in *Application of King Cab LLC for Approval to Provide Taxi Service Between Points in Dauphin, Cumberland, and Lancaster Counties*, Docket

No. A-2015-2514005 (Order entered August 8, 2016), “the Commission’s regulations do not specifically provide for a motion to dismiss.”³

26. However, Section 5.103 of the Commission’s regulations allows “[a] request [to] be made by motion for relief desired.”⁴ The motion “must set forth the ruling or relief sought, and state the grounds therefor and the statutory or other authority upon which it relies.”⁵

27. Further, the Commission has previously treated a motion to dismiss as a motion for summary judgment, where the filing appears more akin to the same.⁶ The Commission’s regulations do provide for motions for summary judgment.

28. Pursuant to Section 5.102 of the Commission’s regulations, a motion for summary judgment will be granted where “the applicable pleadings, depositions, answers to interrogatories and admissions, together with affidavits, if any, show that there is no genuine issue as to a material fact and that the moving party is entitled to judgment as a matter of law.”⁷

29. In a motion for summary judgment, the Commission must view the record in the light most favorable to the non-moving party, giving that party the benefit of all reasonable inferences, and the Commission must resolve all doubts as to the existence of a genuine issue of material fact against the moving party.⁸ The non-moving party must allege facts showing that an issue for trial exists.⁹

³ *Application of King Cab LLC for Approval to Provide Taxi Service Between Points in Dauphin, Cumberland, and Lancaster Counties*, Docket No. A-2015-2514005 (Order entered August 8, 2016) (Adopted on September 29, 2016) (“*Application of King Cab*”).

⁴ *Application of King Cab* at 7; 52 Pa. Code § 5.103.

⁵ 52 Pa. Code § 5.103(a).

⁶ *William MacLuckie v. Palmco Energy PA, LLC*, 2014 Pa. PUC LEXIS 383, **8-9, Docket No. C-2014-2402558 (Order entered June 16, 2014).

⁷ 52 Pa. Code § 5.102(d)(1).

⁸ *MacLuckie* at *10 (citations omitted).

⁹ *Id.*

30. Section 57.72(c)(14) of the Commission’s regulations provides that a full siting application shall contain “[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.”¹⁰

31. Letters of notification do not require the submission of the same amount of evidence as is required for a full siting application under Ch. 57, Subch. G of the Commission’s regulations. Specifically, letters of notification, when submitted in lieu of a full siting application, must contain the information described in Section 57.72(c)(1)-(3), (5), and (6) of the Commission’s regulations.¹¹

32. Indeed, the Commission’s regulations at Ch. 57, Subch. G make clear the distinction between a “letter of notification” and a “full siting application.” Indeed, a letter of notification is an abbreviated submission that can be used only when a utility demonstrates that the subject HV line project satisfies the criteria of 52 Pa. Code § 57.72(d)(1).

33. “Ripeness is a prerequisite to judicial review.”¹²

34. The doctrine of ripeness mandates the presence of an “actual controversy” and requires consideration of whether the issues are adequately developed and the hardships that the parties will suffer if review is delayed.¹³

III. ARGUMENT

A. THE RENEWED MOTION IS PROCEDURALLY IMPROPER

¹⁰ 52 Pa. Code § 57.72(c)(14).

¹¹ 52 Pa. Code § 57.72(d).

¹² *Hovis v. Nat’l Fuel Gas Distrib. Corp.*, 2008 Pa. PUC LEXIS 899, at *6-11 (Nov. 10, 2008) (Initial Decision) (“*Hovis*”), adopted without further action, Docket No. C-2008-2035033 (Order entered Feb. 23, 2009).

¹³ *Bayada Nurses, Inc. v. Dep’t of Labor and Indus.*, 8. A.3d 866, 874 (Pa. 2010).

35. The ALJs issued an Order denying Ms. Cook's first Motion to Deny on June 23, 2026.

36. Ms. Cook did not seek interlocutory review of the ALJs' June 23, 2026 Order.

37. The Renewed Motion appears to be a procedurally improper attempt to circumvent Ms. Cook's failure to properly seek interlocutory review of the June 23, 2026 Order when it was issued.

38. Section 5.302 of the Commission's regulations require a party to submit timely petitions for interlocutory review.¹⁴

39. Ms. Cook's Renewed Motion is not timely.

40. Timely submission would have been before the opposing parties submitted their Direct Testimony, or very shortly thereafter, in order to avoid prejudice to PPL Electric in the development of its rebuttal case.

41. Ms. Cook's decision to file the Renewed Motion on August 12, 2026, was far too late, and Ms. Cook provided no explanation for the delay in her filing, particularly considering the rapidly approaching hearings in the instant proceeding.

42. Further, Ms. Cook primarily renewed the same arguments from her first Motion to Deny, which were previously rejected by the ALJs, and were subsequently uncontested by Ms. Cook.

43. The ALJs considered Ms. Cook's arguments, agreed with the Company that the existence of pending litigation in other forums does not require the instant proceedings to be stayed, and found that there are genuine issues of material fact.¹⁵

¹⁴ 52 Pa. Code § 5.302.

¹⁵ Order Denying Motion to Deny Applications/Petition, Docket No. A-2025-3059443, at 9 (Order entered June 23, 2026).

44. Ms. Cook's arguments were rejected once and should be rejected again.

B. THE LETTER OF NOTIFICATION CONTAINS ALL OF THE ELEMENTS REQUIRED BY THE COMMISSION'S REGULATIONS

45. The Letter of Notification complies with the Commission's regulations and contains all of the elements required at Section 57.72(d).¹⁶

46. The evidence submitted as part of the Letter of Notification included:

- The name of the applicant and the address of its principal business office;
- The name, title, and business address of the applicant's attorney and person authorized to receive notice and communications with respect to the application, if not the attorney of the applicant;
- A general description of the proposed route of the HV line;
- A general statement of the need for the proposed HV line; and
- A statement of safety considerations to be incorporated into the design, construction, and maintenance of the proposed HV line.¹⁷

47. This information is included within the Letter of Notification itself, as well as within Attachment 1 – Necessity Statement and Attachment 4 – Design Criteria and Safety.

48. Ms. Cook avers that the application must contain the information contained in the Commission's regulations at Section 57.72(c)(14), pertaining to ongoing or concluded litigation related to the proposed transmission line.¹⁸ However, the Letter of Notification need not contain this information, as a letter of notification is an abbreviated form of siting application, the filing requirements for which are included at Section 57.72(d).¹⁹

49. Moreover, even if the Letter of Notification was required to contain this information, the plain language of the regulation states that this information is regarding "litigation

¹⁶ 52 Pa. Code § 57.72(d).

¹⁷ 52 Pa. Code § 57.72(c)(1)-(3), (5), and (6).

¹⁸ 52 Pa. Code § 57.72(c)(14); Cook Renewed Motion, p. 9.

¹⁹ 52 Pa. Code § 57.72(d).

concluded or in progress which concerns property or matter relating to the proposed HV line, right-of-way route or environmental matters.”²⁰ The information that Ms. Cook avers is missing from the Letter of Notification is not “relating to the proposed HV line, right-of-way route or environmental matters.” Rather, it relates to separate land use and zoning proceedings regarding non-utility facilities and uses.

50. Finally, even if this information was required to be provided in the Letter of Notification, but was not provided, it has been disclosed during the course of this proceeding. Both discovery and testimony have addressed the active land-use and zoning litigation between NP Hazleton Holdings 1, LLC and the Hazle Township Board of Supervisors.

C. MS. COOK HAS NOT MET THE STANDARD FOR A MOTION TO DISMISS

51. The Motion to Deny does not meet the standard set forth under 52 Pa. Code § 5.102, because Ms. Cook has not made a showing that no genuine issue of material fact exists and that she is entitled to judgment as a matter of law.

52. Ms. Cook avers that the Letter of Notification is premature because of pending litigation in another court. However, the mere existence of litigation pending elsewhere does not provide support for the position that there is no genuine issue of material fact in the instant matter.

53. The ALJs agreed with PPL Electric in its June 23, 2026 Order Denying Ms. Cook’s first Motion to Deny, stating that “the existence of pending litigation in other forums does not require these proceedings to stop,” and noting that the Commission’s Interim Guidelines for the Filing of Electric Transmission Line Siting Applications does not contain an indication that the siting process should stop pending other approvals.²¹

²⁰ 52 Pa. Code § 57.72(d)(14) (emphasis added).

²¹ June 23, 2026 Order, p. 9; *Re: Interim Guidelines for the Filing of Electric Transmission Line Siting Applications*, 2010 Pa. PUC LEXIS 2069, *56 (Order entered Nov. 5, 2010).

54. The ALJs also explicitly stated that “there are genuine issues of material fact” in the instant proceeding.²²

55. Indeed, the evidentiary record shows that there are sufficient facts present to make out a *prima facie* cause of action. As detailed in Section III.A., *supra*, the Company’s initial filing itself was sufficient to satisfy this standard because it provided all of the necessary information as detailed in the Commission’s regulations at Section 57.72(d).²³

56. Ms. Cook presents no new evidence in her Renewed Motion which would warrant the ALJs’ reconsideration of the established position that there are genuine issues of material fact.

57. Ms. Cook does present a new argument in her Renewed Motion, which is that the Letter of Notification proceeding is similar to an ongoing proceeding in which the Greater Hazleton Community Area New Development Organization., t/a CAN DO, INC. (“CAN DO”), filed an application pursuant to the Pennsylvania Public Utility Code at 66 Pa.C.S. §§ 1102(a) for approval of the right to supply water service to the public in portions of Hazle and Sugarloaf Townships and West Hazleton Borough, and abandonment of portions of its water service territory in Hazle and East Union Townships (“CAN DO CPC Application”).²⁴

58. The ALJs in that proceeding decided to stay the CAN DO CPC Application “until CAN DO is able to show the need for water service to the Requested Service Territory is a present

²² June 23, 2026 Order, p. 9.

²³ 52 Pa. Code § 57.72(d).

²⁴ *Application of Greater Hazleton Community Area New Development Organization Inc. t/a CAN DO, INC., Pursuant to Section 1102(a) of the Code, for Approval of (1) the Right to Offer, Render, Furnish or Supply Water Service to the Public in an Additional Portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania and (2) Abandonment of Portions of its Water Service Territory in Hazle Township, Luzerne County, Pennsylvania and East Union Township, Schuylkill County, Pennsylvania*, Docket No. A-2026-3059809.

need,” given ongoing land use litigation before the Commonwealth Court involving NP Hazleton Holdings 1, LLC’s and development plan.²⁵

59. While Ms. Cook argues that the same logic should apply to the Letter of Notification,²⁶ this argument should be rejected. Entirely different considerations are at play in the CAN DO CPC Application proceeding than are relevant in the instant Letter of Notification proceeding.

60. Notably, in the Order staying the CAN DO CPC Application, the ALJs cited to Commission precedent which “demonstrates that land use planning approval is an essential factor for a main extension application approval,” because “consideration of the existence or lack of approval allows the Commission to examine, with a reasonable degree of certainty, information such as the number of customers and their water usage needs.”²⁷

61. The instant case is distinguishable in that PPL Electric is already authorized to provide service in the territory in question, and is not a water or wastewater utility that requires a CPC for authority to provide service in new or expanded territory. Commission precedent does not establish that an essential factor for a letter of notification proceeding is land use planning approval.

62. To the contrary, as already stated in the instant Section and as discussed in Section III.D, *infra*, Commission precedent establishes that land use planning approvals unrelated to the facilities sought to be constructed under 52 Pa. Code Ch. 57, Subch. G are not necessary for a letter of notification proceeding to advance.

²⁵ *Interim Order #10 Staying Proceeding*, Docket No. A-2026-3059809, p. 10 (Order entered August 11, 2026).

²⁶ Cook Renewed Motion, p. 10.

²⁷ *Interim Order #10 Staying Proceeding*, Docket No. A-2026-3059809, p. 7 (Order entered August 11, 2026).

63. Therefore, viewing the facts in the light most favorable to the Company, Ms. Cook is not entitled to judgment as a matter of law. To the extent Ms. Cook is disputing the need for the Project, a genuine issue of material fact exists, which should be addressed at a hearing in this matter, and the Motion should be denied.

D. THE LETTER OF NOTIFICATION IS NOT PREMATURE AND IS RIPE FOR THE COMMISSION’S REVIEW

64. Ms. Cook further argues that the existing appeal of land use rights unrelated to the proposed HV lines pending before the Commonwealth Court arguing that the “Applicant cannot definitively establish compliance with local ordinances or environmental regulations.”²⁸ She then argues that the Letter of Notification proceeding is “contingent” upon the resolution of the land use proceeding before the Luzerne County Court of Common Pleas, and that it is an “unripe matter.”²⁹

65. These same arguments were made in Ms. Cook’s first Motion to Deny, which was ultimately denied.

66. As the Company stated in its Answer to the first Motion to Deny, a matter is ripe for judicial review where there is an actual controversy.

67. PPL Electric maintains that it has met the prerequisite of ripeness. The Letter of Notification has been submitted, along with all requisite accompaniments to that Letter of Notification.

68. The submission of the Letter of Notification, along with the Company’s submission of its direct and rebuttal testimony, the active parties’ submission of direct testimony, and the level

²⁸ Cook Renewed Motion, p. 9.

²⁹ Cook Renewed Motion, p. 13.

to which all parties have already engaged with the proceeding (e.g., discovery), demonstrate that the issues are adequately developed.

69. Additionally, PPL Electric will undoubtedly suffer hardships if judicial review is delayed.

70. As discussed more fulsomely in Section III.E., *infra*, a denial of the Letter of Notification, even without prejudice, will result in the expenditure of significant time and resources when re-filing the Letter of Notification, and may result in the repetition of several procedural steps which have already occurred (i.e., prehearing conference, setting a procedural schedule, discovery, motions, testimony, etc.).

E. DENIAL OF THE LETTER OF NOTIFICATION IS NOT NECESSARY TO PREVENT REGULATORY CONFLICT

71. Ms. Cook argues that a dismissal of the Letter of Notification without prejudice would “[clear] the Commission’s docket of a contingent, unripe matter.”³⁰

72. It would not be in the interest of judicial economy and efficiency to delay the Letter of Notification proceeding in any manner. In one case involving the possible abeyance of a proceeding in light of an ongoing proceeding with similar issues in the Commonwealth Court, the ALJ assigned to that proceeding stated:

“The Commission frequently addresses legal issues that are in the process of being appealed. The parties must take the law as they find it. The Commission would not be effective or efficient if it had to delay proceedings until cases with similar legal issues were decided on appeal, especially given the opportunity for any further appeal to the Pennsylvania Supreme Court. To the extent that any appellate proceeding concludes during the pendency of this proceeding, the results will be duly considered. The Commission cannot wait,

³⁰ Motion to Deny at 10.

however, until the appellate proceeding is concluded to adjudicate cases with similar issues.”³¹

73. The Commission itself has acknowledged that the “complete universe” of regulatory approvals may not be known at the time of filing a transmission line siting application,³² and it is not unusual that other regulatory approvals may be pending at the time a letter of notification is filed.

74. Indeed, in Attachment 3 to Letter of Notification, PPL Electric indicated that it had and would continue to consult with jurisdictional agencies in order to obtain all necessary approvals and permits for construction of the subject HV transmission line facilities, not that it had already obtained each of those necessary permits and approvals.

75. The mere existence of ongoing land-use and zoning litigation un-related to PPL Electric’s proposed HV transmission line facilities to which Ms. Cook refers in her Motion to Deny, while related to the instant Letter of Notification, is not sufficient to justify a denial of the Letter of Notification.

76. The process of obtaining other regulatory approvals related to a proposed HV transmission line is a separate process from an HV transmission line siting application. However, the Commission regularly approves the siting and construction of HV transmission lines contingent upon the utility obtaining the necessary additional permits required to site and construct those facilities.

77. Ms. Cook’s argument is an additional step further removed. The appellate proceeding before the Commonwealth Court relates to land use and zoning issues involving non-

³¹ *Heidi Fiedler v. Metropolitan Edison Company*, Docket No. C-2018-3003642 (Order entered July 16, 2020) (emphasis added).

³² *Re: Interim Guidelines for the Filing of Electric Transmission Line Siting Applications*, 2010 Pa. PUC LEXIS 2069, *56 (Order entered Nov. 5, 2010).

utility buildings and facilities. If related proceedings involving HV transmission line facilities can be ongoing at the time the Commission approves the siting and construction of HV transmission line facilities, then proceedings involving non-utility facilities that may relate to the subject lines can certainly be ongoing at the time the Commission approves the siting and construction of the lines.

78. Moreover, a more efficient and less prejudicial vehicle by which to ensure that all local approvals are obtained would be for the Commission to condition its approval of the Letter of Notification on PPL Electric's acquisition of all necessary permits and approvals before initiating construction of the subject facilities.

F. PPL ELECTRIC WOULD BE PREJUDICED BY A DENIAL OF THE LETTER OF NOTIFICATION

79. PPL Electric would be prejudiced by a denial of the Letter of Notification.

80. A denial of the Letter of Notification with a directive to re-file the Letter of Notification at a later, unspecified date in the future will seriously jeopardize the Company's ability to meet the customer's service need, and puts PPL Electric at risk of falling out of compliance with its obligation to provide non-discriminatory service and to serve customers in its service territory, subject to the terms and conditions of its tariffs and certificate of public convenience.

81. Further, significant procedural developments have already occurred in this proceeding. Parties have expended time and resources to take discovery, attend public input hearings, and submit multiple rounds of written testimony.

82. Moreover, other parties' surrebuttal testimony is due a mere three days after the due date and filing of this Answer. Similarly, hearings are a mere 16 days away.

83. Dismissal as requested by the Renewed Motion to Deny would result in wasting of the time and resources expended to date, and that are anticipated to be spent as the parties prepare for and attend evidentiary hearings in this matter.

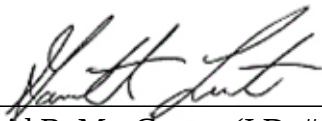
84. Therefore, the Renewed Motion to Deny should be denied.

IV. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Renewed Motion to Deny the Applications/Petition Without Prejudice of the Erika Cook be denied.

Respectfully submitted,

Michael J. Shafer (I.D. # 205681)
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
Voice: 610-774-2599
Fax: 610-774-4102
E-mail: mjshafer@pplweb.com



David B. MacGregor (I.D. # 28804)
Garrett P. Lent (I.D. # 321566)
Lindsay A. Berkstresser (I.D. # 318370)
Megan E. Rulli (I.D. # 331981)
Hayley E. Wilburn (I.D. # 336055)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Voice: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: glent@postschell.com
E-mail: lberkstresser@postschell.com
E-mail: mrulli@postschell.com
E-mail: hwilburn@postschell.com

Date: September 1, 2026

Attorneys for PPL Electric Utilities Corporation