

COMMONWEALTH OF PENNSYLVANIA



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September 18, 2026

Via Electronic Mail Only

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 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 on the New Tomhicken 230 kV Switchyard that are Respectively Located in Luzerne County, Pennsylvania; Docket No. A-2025-3059443

Dear Secretary Homsher:

Enclosed please find the Motion of the Office of Consumer Advocate (OCA) to Amend or Withdraw Expert Witnesses' Admissions Pursuant to 52 Pa. Code Section 5.350(f) in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Melanie Joy El Atieh
Melanie Joy El Atieh, Esq.
Deputy Consumer Advocate
PA Attorney I.D. # 209323
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Enclosures

cc: Administrative Law Judge John M. Coogan (Via Email Only: jcoogan@pa.gov)
Administrative Law Judge Erin L. Gannon (Via Email Only: egannon@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 :

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, Motion of the Office of Consumer Advocate (OCA) to Amend or Withdraw Expert Witnesses' Admissions Pursuant to 52 Pa. Code Section 5.350(f), upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 18th day of September 2026.

SERVICE BY E-MAIL ONLY

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Dated: September 18, 2026

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Letter of Notification of PPL Electric :
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:

MOTION OF THE OFFICE OF CONSUMER ADVOCATE
TO AMEND OR WITHDRAW EXPERT WITNESSES' ADMISSIONS
PURSUANT TO 52 PA. CODE § 5.350(F)

AND NOW, before Administrative Law Judges (ALJs) Erin L. Gannon and John M. Coogan, the Pennsylvania Office of Consumer Advocate (OCA) files this Motion to Amend Admission pursuant to Section 5.350(f) of the Commission's regulations. 52 Pa. Code § 5.350(f) for presentation during the second day of scheduled evidentiary hearings.

I. Procedural Background

On July 16, 2026, PPL Electric Utilities Corporation (PPL Electric) propounded Set I Requests for Admission (RFA) on the OCA.

On August 5, 2026, the OCA served its responses to PPL Electric's Set I RFA. In pertinent part, the OCA's Responses to Set I RFA included responses to RFA Nos. 2, 3, 5, 15, 21, 22, 23, and 24.

On September 15, 2026, during witness preparation sessions, the OCA, as a party, learned that its expert witness, Dr. Frank Felder, needed to supplement or correct his responses to PPL RFA Set I, Nos. 2, 3, and 15, so that his responses would remain true, correct, and complete. The OCA

also learned that its expert witness, Mr. Rao Konidena, needed to supplement or correct his responses to PPL RFA Set I, Nos. 2, 3, 5, 21, 22, 23, and 24, so that his responses would remain true, correct, and complete.¹

After the OCA's attorneys learned of this need to supplement the responses to these RFAs, the OCA attorneys promptly informed PPL Electric's counsel and identified some of the responses over a phone call. During that call, PPL Electric's counsel requested that the supplemental responses be served by the next day and did not raise an oral objection.

On September 16, 2026, the OCA served written supplemental responses to PPL Electric's Set I RFA, nos. 2, 3, 5, 15, 21, 22, 23, and 24,² on all the parties, and timely e-filed, on the same day, a cover letter and certificate of service with the Commission. A copy of the Supplemental Responses are attached as **Appendix A**.

On September 16, 2026, around 4:14pm, PPL Electric's counsel replied to OCA counsel that it objected to the OCA's supplemental responses and asserted that the OCA is required to make a motion seeking ALJ permission to amend the matters admitted in PPL RFA Set I, Nos. 2, 3, 5, 15, 21, 22, 23, and 24.

On September 17, 2026, day one of the evidentiary hearing, OCA counsel raised this matter and the need for an oral or written motion related to the admissions. ALJs Coogan and Gannon requested that the OCA file a written motion in advance of the hearing scheduled for September 18, 2026. Counsel for PPL Electric did not object to the OCA making the motion and indicated that answering the motion orally would be sufficient.

¹ The OCA also learned that its expert witness, Mr. Konidena, needed to supplement or correct his response to PPL Interrogatories Set I, No. 46.

² The OCA also served a supplemental response to PPL Electric Interrogatories Set I, Question No. 46, but interrogatory responses are not subject to Section 5.350(f) and therefore are not subject to this motion to amend.

II. Applicable Law

The essential purpose of discovery is to give each side access to all information reasonably calculated to lead to the discovery of relevant, non-privileged information possessed by the other side. *Ario v. Deloitte & Touche, LLP*, 934 A.2d 1290, 1292-93 (Pa. Cmwlth. 2007) (internal citations omitted).

Per the Commission's regulations, parties and expert witnesses are under a continuing duty to amend a prior response upon discovering that the response is incorrect or incomplete. 52 Pa. Code § 5.332(2). The duty to supplement applies to all types of discovery responses, including but not limited to responses to requests for admission or denials. 52 Pa. Code § 5.332.

For requests for admissions, "a matter admitted...is conclusively established unless the presiding officer on motion permits withdrawal or amendment of admission." 52 Pa. Code § 5.350(f).

III. Motion

The OCA requests that the presiding officers permit the OCA's expert witness to amend their prior admissions in response to PPL Electric Set I RFAs. Specifically, the OCA requests that the presiding officers permit Dr. Felder to amend his prior admissions to PPL RFA Set I, Nos. 2, 3, and 15, so that the responses would remain true, correct, and complete, and likewise permit Mr. Konidena to amend his prior admissions to PPL RFA Set I, Nos. 2, 3, 5, 21, 22, 23, and 24, so that his responses would remain true, correct, and complete.

The cause or impetus for the required amendments relates to separate hearing preparation sessions that the OCA counsel of record held with each expert witness in advance of the scheduled hearings. During the hearing preparation session, OCA counsel explained to each expert witness the broad legal standards for a "need" determination under Section 57.76(a)(1) of the Commission's regulations and Section 1501 of the Public Utility Code, as such standards have

been interpreted and applied in a prior Commission decision and in Commonwealth Court precedent. 52 Pa. Code § 57.76(a)(1); 66 Pa. C.S. ¶ 1501. More specifically, OCA's counsel explained to witnesses Dr. Felder and Mr. Konidena that the Commonwealth Court held that the Commission could consider evidence of increased consumer prices and weigh competing cost impacts in determining whether a transmission project was necessary. *Transource Pa., LLC v. Pa. PUC*, 278 A.3d 942, 966 (Pa. Cmwlth. 2022) (citing *Hess v. Pa. PUC*, 107 A.3d 246, 260 (Pa. Cmwlth. 2014)). OCA's counsel further explained to these witnesses that in the underlying *Transource* proceeding, the Commission expressly stated that

The potential negative and practical impact on the citizens and consumers of Pennsylvania” is our concern, and it is properly within the scope of our consideration of the weight of all the evidence on the issue of ‘need.’ ... Therefore, our broad review of the issue under the statute, Commission Regulations, and relevant caselaw, including the decision in [*In re: Application of Trans-Allegheny Interstate Line Co.*, Docket No. A-110172 (Order entered December 12, 2008) (*TRAILCo Case*)], encompasses consideration of the potential negative impact to the citizens and consumers of the Commonwealth by the proposed [project].

Transource Pa., LLC v. Pa. PUC, Docket Nos. A-2017-2640195 et al., Order at 59 (May 20, 2021).

Additionally, OCA counsel further explained to these expert witnesses that in *TRAILCo*, the Commission expressly held that it was “entirely appropriate” for the ALJs to examine “federal policy and national issues revolving around the transmission grid,” as well as “the potential costs of green house emissions, DSM and energy efficiency alternatives and whether the proposal was built to facilitate west-to-east transfers of generation” when making its “need” determination under Section 1501 of the Public Utility Code and Section 57.76(a)(1) of the Commission’s regulations. *In re: Application of Trans-Allegheny Interstate Line Co. (TRAILCo)*, 2008 Pa. PUC LEXIS 35, *47-48 (Nov. 13, 2008).

Upon receiving this advice of counsel, both Mr. Felder and Mr. Konidena identified the need to amend certain of their prior admissions so that their responses would remain true, correct, and complete.

Furthermore, during the hearing preparation session with Mr. Konidena, upon a question asked by the expert witness, OCA counsel advised Mr. Konidena that Section 57.76(a)(2) may not be limited to a narrow reading of potential fire hazards and Electrical Safety Code violations. Upon this advice of counsel, Mr. Konidena identified the need to amend certain of his prior admissions and interrogatory responses so that his responses would remain true, correct, and complete.

Based on above, as these expert witnesses became better advised on the current state of Pennsylvania law, in consultation with the OCA's attorneys, they made decisions on how to apply the law to their expert opinions and as a result they decided that they needed to supplement their prior admissions so that their response would remain true, correct and complete. Below is the list of amendments to or withdrawals being requested of the pertinent prior admissions.

A. Requested Amendments and Withdrawals for Expert Witness Frank Felder, Ph.D.

The OCA requests that the presiding officers permit Dr. Felder to amend his prior admissions to PPL RFA Set I, Nos. 2, 3, and 15.

1. PPL Electric RFA Set I, No. 2 – Request for amendment, in part, and withdrawal, in part.

RFA: Admit neither OCA Statement 1 nor OCA Statement 2 disputes that there is a need for the Project.

Response: Dr. Felder admits that OCA Statement 1 “does not contest the need for the Tomhicken Switchyard to serve this customer”.

Supplemental Response: Dr. Felder clarifies that his admission is limited to acknowledging that OCA Statement 1 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Dr. Felder denies that his testimony does not dispute the need for the Project insofar as the Commission's determination of need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania's citizens and consumers.

2. PPL Electric Set I, No. 3 – Request for amendment, in part, and withdrawal, in part.

RFA: Admit there is a need for the Project.

Response: Please see Dr. Felder's earlier response to PPL RFA to OCA, Set I-2.

Supplemental Response: Please see Dr. Felder's earlier supplemental response to PPL RFA to OCA, Set I-2.

3. PPL Electric RFA Set I, No. 15 – Request for amendment, in part, and withdrawal, in part.

RFA: Admit Mr. Felder does not recommend that the Commission deny the Project because there is not a need for it.

Response: Dr. Felder admits that OCA Statement 1 does not specifically include a recommendation "that the Commission deny the Project because there is not a need for it."

Supplemental Response: Dr. Felder clarifies that his admission is limited to acknowledging that OCA Statement 1 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Dr. Felder denies that his testimony does not dispute the need for the Project insofar as the Commission's determination of

need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania's citizens and consumers.

B. Requested Amendments and Withdrawals for Expert Witness Rao Konidena

1. PPL Electric RFA Set I, No. 2 - Request for amendment, in part, and withdrawal, in part.

RFA: Admit neither OCA Statement 1 nor OCA Statement 2 disputes that there is a need for the Project.

Response: Mr. Konidena admits that OCA Statement 2 “does not contest the need for the Tomhicken Switchyard to serve this customer”³ assuming that the customer identified in the letter of notification ultimately connects to the Project facilities⁴.

Supplemental Response: Mr. Konidena clarifies that his admission is limited to acknowledging that OCA Statement 2 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Mr. Konidena denies that his testimony does not dispute the need for the Project insofar as the Commission's determination of need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania's citizens and consumers.

2. PPL Electric RFA Set I, No. 3 - Request for amendment, in part, and withdrawal, in part.

RFA: Admit there is a need for the Project.

Response: Please see Mr. Konidena’s earlier response to PPL RFA to OCA, Set I-2.

Supplemental Response: Please see Mr. Konidena’s earlier supplemental response to PPL RFA to OCA, Set I-2.

³ OCA Statement 2 Page 45, Line 6-7.

⁴ OCA Statement 2 Page 62, Lines 6-9.

3. PPL Electric RFA Set I, No. 5 – Request for amendment.

RFA: Admit the Project will not create an unreasonable risk of danger to the health and safety of the public.

Response: Mr. Konidena neither admits nor denies because OCA Statement 2 does not opine on whether “the Project will not create an unreasonable risk of danger to the health and safety of the public”.

Supplemental Response: Mr. Konidena clarifies that his original response that he does not opine on whether the Project will create an “unreasonable risk of danger to the health and safety of the public” was limited to PPL’s compliance with applicable Electrical Safety Code standards and other legal requirements. Mr. Konidena does, however, offer an opinion regarding whether the Project, as proposed, could create an unreasonable risk of danger to the health and safety of the public based on the Project’s anticipated operating conditions. Specifically, if the Project proceeds as proposed and the identified customer adds its projected load to the system, the resulting conditions may lead to thermal overloads and voltage violations. Accordingly, Mr. Konidena denies that the Project will not create an unreasonable risk of danger to the health and safety of the public.

4. PPL Electric RFA Set I, No. 21 – Request for amendment, in part, and withdrawal, in part.

RFA: Admit Mr. Konidena does not recommend that the Commission deny the Project based upon any of the criteria set forth in 52 Pa. Code 57.76(a).

Response: With regards to 52 Pa. Code 57.76(a)(1), Mr. Konidena admits that OCA Statement 2 “does not contest the need for the Tomhicken Switchyard to serve this customer”⁵

⁵ OCA Statement 2 Page 45, Line 6-7.

assuming that the customer identified in the letter of notification ultimately connects to the Project facilities⁶. With regards to 52 Pa. Code 57.76(a)(2) through 52 Pa. Code 57.76(a)(4), Mr. Konidena admits that OCA Statement 2 does not specifically recommend that the Commission deny the Project because “the Project will not create an unreasonable risk of danger to the health and safety of the public”; “the Project is in compliance with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth”; “the Project will have minimum adverse environmental impact”.

Supplemental Response: Mr. Konidena clarifies that his admission is limited to acknowledging that OCA Statement 2 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Mr. Konidena denies that his testimony does not dispute the need for the Project insofar as the Commission's determination of need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania's citizens and consumers. Mr. Konidena clarifies that his original response that he does not specifically recommend that the Commission deny the Project because it will create an “unreasonable risk of danger to the health and safety of the public” was limited to PPL's compliance with applicable Electrical Safety Code standards and other legal requirements. Mr. Konidena does, however, offer an opinion regarding whether the Project, as proposed, could create an unreasonable risk of danger to the health and safety of the public based on the Project's anticipated operating conditions. Specifically, if the Project proceeds as proposed and the identified customer adds its projected load to the system, the resulting conditions may lead to thermal overloads and voltage violations. Accordingly, Mr. Konidena denies that the Project will not create an unreasonable risk of danger to the health and safety of the public.

⁶ OCA Statement 2 Page 62, Lines 6-9.

5. PPL Electric RFA Set I, No. 22 – Request for amendment, in part, and withdrawal, in part.

RFA: Admit Mr. Konidena does not recommend that the Commission deny the Project because there is not a need for it.

Response: Mr. Konidena admits that OCA Statement 2 does not specifically include a recommendation “that the Commission deny the Project because there is not a need for it”⁷.

Supplemental Response: Mr. Konidena clarifies that his admission is limited to acknowledging that OCA Statement 2 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Mr. Konidena denies that his testimony does not dispute the need for the Project insofar as the Commission's determination of need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania’s citizens and consumers.

6. PPL Electric RFA Set I, No. 23 – Request for amendment, in part, and withdrawal, in part.

RFA: Admit Mr. Konidena testified that there is a need for the Project.

Response: Mr. Konidena admits that OCA Statement 2 “does not contest the need for the Tomhicken Switchyard to serve this customer”⁸ assuming that the customer identified in the letter of notification ultimately connects to the Project facilities⁹.

Supplemental Response: Please see Mr. Konidena’s earlier supplemental response to PPL RFA to OCA, Set I-22.

⁷ OCA Statement 2 Page 45, Line 6-7.

⁸ OCA Statement 2 Page 45, Line 6-7.

⁹ OCA Statement 2 Page 62, Lines 6-9.

7. PPL Electric RFA Set I, No. 24 – Request for amendment, in part, and withdrawal, in part.

RFA: Admit Mr. Konidena does not recommend that the Commission deny the Project because the Project will create an unreasonable risk of danger to the health and safety of the public.

Response: Mr. Konidena admits that OCA Statement 2 does not specifically include a recommendation “that the Commission deny the Project because the Project will not create an unreasonable risk of danger to the health and safety of the public”.

Supplemental Response: Mr. Konidena clarifies that his original response that he does not specifically recommend that the Commission deny the Project because it will create an “unreasonable risk of danger to the health and safety of the public” was limited to PPL’s compliance with applicable Electrical Safety Code standards and other legal requirements. Mr. Konidena does, however, offer an opinion regarding whether the Project, as proposed, could create an unreasonable risk of danger to the health and safety of the public based on the Project’s anticipated operating conditions. Specifically, if the Project proceeds as proposed and the identified customer adds its projected load to the system, the resulting conditions may lead to thermal overloads and voltage violations. Accordingly, Mr. Konidena denies that the Project will not create an unreasonable risk of danger to the health and safety of the public.

C. Granting this motion would not prejudice PPL Electric because they have put on a full case with written direct, rebuttal, and rejoinder testimonies, and they can cross-examine OCA’s witnesses during day two of the scheduled hearings.

Granting this motion would not prejudice PPL Electric because they have had the opportunity to put on a full case including written direct, rebuttal, and rejoinder testimonies, and they can still cross-examine OCA’s witnesses during day two of the scheduled hearings.

In a related but separate procedural matter, PPL Electric's Objections and Motion to Strike, which was e-filed on Tuesday, September 15, PPL Electric argues that portions of the OCA's testimony are impermissible and irrelevant because they address the reasonableness and prudence of PPL Electric's transmission costs, rates, allocation, and cost recovery; because the witnesses request the Commission to modify PPL's tariff in this proceeding; and because they raise issues concerning federal and statewide large-load policies that PPL contends are outside the scope of this proceeding.

However, as a party to this proceeding, the OCA will not request this type of relief in its briefs; specifically, it will not ask for determinations in this proceeding as to PPL Electric's transmission rates, cost allocation, cost recovery, and tariff provisions. Notwithstanding this commitment, these recommendations from the OCA's experts are highly relevant to this proceeding because they show the negative impacts that exist as a result of this Phase I Project being built based on the evidence that exists to date. These recommendations further go to the fact that changes would be required in order to address or mitigate these negative impacts. The OCA plans to demonstrate that PPL Electric has neither proposed nor is doing the actions recommended by its witnesses as a showing that the negative impacts are not being mitigated.

Again, while the OCA will not be requesting the specific forms of relief recommended by its witness in its briefs, that the OCA's witnesses have recommended these types of actions in order to remove or mitigate the negative impact goes directly to the OCA's legal argument that PPL Electric has failed to meet its burden of proof on the question of need for the Project as pursuant to Section 57.76(a)(1) of the Commission's regulations and Section 1501 of the Public Utility Code and further has failed to meet its burden of proof on the question of whether the Phase I project will create an unreasonable risk of danger to the health and safety of the public pursuant to Section

57.76(a)(2) of the Commission's regulations and Section 1501 of the Public Utility Code. The OCA will fully brief these relevant issues under Section 1501 of the Public Utility Code and Sections 57.76(a)(1)-(2) during the briefing stage of this proceeding.

IV. CONCLUSION

For the foregoing reasons, the OCA respectfully requests that the ALJs grant the OCA's motion to amend or withdraw prior admissions.

Respectfully submitted,

/s/ Melanie Joy El Atieh
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Dated: September 18, 2026

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COMMONWEALTH OF PENNSYLVANIA



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September 16, 2026

Via Electronic Mail Only

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Dear Counsel:

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Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Olivia M. Spergel
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Enclosures

cc: PUC Secretary Matthew L. Homsher (Letter and Certificate of Service only)
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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 documents, Supplemental Responses of the Office of Consumer Advocate (OCA) to PPL Electric Utilities Corporation's (PPL Electric's) Set I Request for Admissions and Set I Interrogatories to the OCA, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 16th day of September 2026.

SERVICE BY E-MAIL ONLY

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Dated: September 16, 2026

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Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Harrisburg, PA 17105-3265
EFILING - FILING DETAIL

Date Created	Filing Number
9/16/2026	3185966

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Docket Number: A-2025-3059443

Case Description:

Transmission Date: 9/16/2026 3:14 PM

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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

Supplemental OCA Response to Requests for Admissions and Interrogatories of PPL Electric Utilities Corporation

Set I to OCA

OCA is requested to admit or deny the truth of the following:

2. Admit neither OCA Statement 1 nor OCA Statement 2 disputes that there is a need for the Project.

Response: Dr. Felder admits that OCA Statement 1 “does not contest the need for the Tomhicken Switchyard to serve this customer”.

Supplemental Response: Dr. Felder clarifies that his admission is limited to acknowledging that OCA Statement 1 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Dr. Felder denies that his testimony does not dispute the need for the Project insofar as the Commission's determination of need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania's citizens and consumers.

Response: Mr. Konidena admits that OCA Statement 2 “does not contest the need for the Tomhicken Switchyard to serve this customer”¹ assuming that the customer identified in the letter of notification ultimately connects to the Project facilities².

Supplemental Response: Mr. Konidena clarifies that his admission is limited to acknowledging that OCA Statement 2 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Mr. Konidena denies that his testimony does not dispute the need for the Project insofar as the Commission's determination of need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania's citizens and consumers.

Responding Witness: Frank A. Felder
Rao Konidena

Response Date: September 16, 2026

¹ OCA Statement 2 Page 45, Line 6-7.

² OCA Statement 2 Page 62, Lines 6-9.

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

Supplemental OCA Response to Requests for Admissions and Interrogatories of PPL Electric Utilities Corporation

Set I to OCA

OCA is requested to admit or deny the truth of the following:

3. Admit there is a need for the Project.

Response: Please see Dr. Felder's earlier response to PPL RFA to OCA, Set I-2.

Supplemental Response: Please see Dr. Felder's earlier supplemental response to PPL RFA to OCA, Set I-2.

Response: Please see Mr. Konidena's earlier response to PPL RFA to OCA, Set I-2.

Supplemental Response: Please see Mr. Konidena's earlier supplemental response to PPL RFA to OCA, Set I-2.

Responding Witness: Frank A. Felder
Rao Konidena

Response Date: September 16, 2026

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

**Supplemental OCA Response to Requests for Admissions and Interrogatories of PPL Electric Utilities Corporation
Set I to OCA**

OCA is requested to admit or deny the truth of the following:

5. Admit the Project will not create an unreasonable risk of danger to the health and safety of the public.

Response: Dr. Felder denies the statement. Specifically, if the Project proceeds and enables additional load to be added to the PJM system without sufficient supply and reserves, then there is an increased risk that loads may have to be curtailed due to supply shortages. Depending on which loads are curtailed, the curtailment may create an unreasonable risk of danger to the health and safety of the public.

Response: Mr. Konidena neither admits nor denies because OCA Statement 2 does not opine on whether “the Project will not create an unreasonable risk of danger to the health and safety of the public”.

Supplemental Response: Mr. Konidena clarifies that his original response that he does not opine on whether the Project will create an “unreasonable risk of danger to the health and safety of the public” was limited to PPL’s compliance with applicable Electrical Safety Code standards and other legal requirements. Mr. Konidena does, however, offer an opinion regarding whether the Project, as proposed, could create an unreasonable risk of danger to the health and safety of the public based on the Project’s anticipated operating conditions. Specifically, if the Project proceeds as proposed and the identified customer adds its projected load to the system, the resulting conditions may lead to thermal overloads and voltage violations. Accordingly, Mr. Konidena denies that the Project will not create an unreasonable risk of danger to the health and safety of the public.

Responding Witness: Frank A. Felder
Rao Konidena

Response Date: September 16, 2026

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

**Supplemental OCA Response to Requests for Admissions and Interrogatories of PPL Electric Utilities Corporation
Set I to OCA**

Frank A. Felder is requested to admit or deny the truth of the following:

15. Admit Mr. Felder does not recommend that the Commission deny the Project because there is not a need for it.

Initial Response: Dr. Felder admits that OCA Statement 1 does not specifically include a recommendation “that the Commission deny the Project because there is not a need for it.”

Supplemental Response: Dr. Felder clarifies that his admission is limited to acknowledging that OCA Statement 1 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Dr. Felder denies that his testimony does not dispute the need for the Project insofar as the Commission’s determination of need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania’s citizens and consumers.

Responding Witness: Frank A. Felder
Response Date: September 16, 2026

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

Supplemental OCA Response to Requests for Admissions and Interrogatories of PPL Electric Utilities Corporation

Set I to OCA

Rao Konidena is requested to admit or deny the truth of the following:

21. Admit Mr. Konidena does not recommend that the Commission deny the Project based upon any of the criteria set forth in 52 Pa. Code 57.76(a).

Response: With regards to 52 Pa. Code 57.76(a)(1), Mr. Konidena admits that OCA Statement 2 “does not contest the need for the Tomhicken Switchyard to serve this customer”³ assuming that the customer identified in the letter of notification ultimately connects to the Project facilities⁴. With regards to 52 Pa. Code 57.76(a)(2) through 52 Pa. Code 57.76(a)(4), Mr. Konidena admits that OCA Statement 2 does not specifically recommend that the Commission deny the Project because “the Project will not create an unreasonable risk of danger to the health and safety of the public”; “the Project is in compliance with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth”; “the Project will have minimum adverse environmental impact”.

Supplemental Response: Mr. Konidena clarifies that his admission is limited to acknowledging that OCA Statement 2 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Mr. Konidena denies that his testimony does not dispute the need for the Project insofar as the Commission's determination of need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania's citizens and consumers. Mr. Konidena clarifies that his original response that he does not specifically recommend that the Commission deny the Project because it will create an “unreasonable risk of danger to the health and safety of the public” was limited to PPL's compliance with applicable Electrical Safety Code standards and other legal requirements. Mr. Konidena does, however, offer an opinion regarding whether the Project, as proposed, could create an unreasonable risk of danger to the health and safety of the public based on the Project's anticipated operating conditions. Specifically, if the Project proceeds as proposed and the identified customer adds its projected load to the system, the resulting conditions may lead to thermal overloads and voltage violations. Accordingly, Mr. Konidena denies that the Project will not create an unreasonable risk of danger to the health and safety of the public.

Responding Witness: Rao Konidena

Response Date: September 16, 2026

³ OCA Statement 2 Page 45, Line 6-7.

⁴ OCA Statement 2 Page 62, Lines 6-9.

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

**Supplemental OCA Response to Requests for Admissions and Interrogatories of PPL Electric Utilities Corporation
Set I to OCA**

Rao Konidena is requested to admit or deny the truth of the following:

22. Admit Mr. Konidena does not recommend that the Commission deny the Project because there is not a need for it.

Response: Mr. Konidena admits that OCA Statement 2 does not specifically include a recommendation “that the Commission deny the Project because there is not a need for it”⁵.

Supplemental Response: Mr. Konidena clarifies that his admission is limited to acknowledging that OCA Statement 2 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Mr. Konidena denies that his testimony does not dispute the need for the Project insofar as the Commission's determination of need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania's citizens and consumers.

Responding Witness: Rao Konidena
Response Date: September 16, 2026

⁵ OCA Statement 2 Page 45, Line 6-7.

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

**Supplemental OCA Response to Requests for Admissions and Interrogatories of PPL Electric Utilities Corporation
Set I to OCA**

Rao Konidena is requested to admit or deny the truth of the following:

23. Admit Mr. Konidena testified that there is a need for the Project.

Response: Mr. Konidena admits that OCA Statement 2 “does not contest the need for the Tomhicken Switchyard to serve this customer”⁶ assuming that the customer identified in the letter of notification ultimately connects to the Project facilities⁷.

Supplemental Response: Please see Mr. Konidena’s earlier supplemental response to PPL RFA to OCA, Set I-22.

Responding Witness: Rao Konidena

Response Date: September 16, 2026

⁶ OCA Statement 2 Page 45, Line 6-7.

⁷ OCA Statement 2 Page 62, Lines 6-9.

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

**Supplemental OCA Response to Requests for Admissions and Interrogatories of PPL Electric Utilities Corporation
Set I to OCA**

Rao Konidena is requested to admit or deny the truth of the following:

24. Admit Mr. Konidena does not recommend that the Commission deny the Project because the Project will create an unreasonable risk of danger to the health and safety of the public.

Response: Mr. Konidena admits that OCA Statement 2 does not specifically include a recommendation “that the Commission deny the Project because the Project will not create an unreasonable risk of danger to the health and safety of the public”.

Supplemental Response: Mr. Konidena clarifies that his original response that he does not specifically recommend that the Commission deny the Project because it will create an “unreasonable risk of danger to the health and safety of the public” was limited to PPL’s compliance with applicable Electrical Safety Code standards and other legal requirements. Mr. Konidena does, however, offer an opinion regarding whether the Project, as proposed, could create an unreasonable risk of danger to the health and safety of the public based on the Project’s anticipated operating conditions. Specifically, if the Project proceeds as proposed and the identified customer adds its projected load to the system, the resulting conditions may lead to thermal overloads and voltage violations. Accordingly, Mr. Konidena denies that the Project will not create an unreasonable risk of danger to the health and safety of the public.

Responding Witness: Rao Konidena
Response Date: September 16, 2026

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

**Supplemental OCA Response to Requests for Admissions and Interrogatories of PPL Electric Utilities Corporation
Set I to OCA**

PPL to OCA-I-46

46. Please reference OCA Statement 2, page 5, line 10, where Mr. Konidena recommends “The Commission should not approve the \$38.4 million ratepayer allocation as proposed.”
- a. Does Mr. Konidena render any opinion regarding the siting and construction of the HV transmission line facilities contemplated by the subject letter of notification?
 - b. Does Mr. Konidena render any opinion regarding whether PPL Electric has shown that “there is a need” for the proposed HV transmission line facilities contemplated by the subject letter of notification under 52 Pa. Code 57.76(a)(1)?
 - c. Does Mr. Konidena render any opinion regarding whether PPL Electric has shown that the proposed HV transmission line facilities contemplated by the subject letter of notification “will not create an unreasonable risk of danger to the health and safety of the public” under 52 Pa. Code 57.76(a)(2)?
 - d. Does Mr. Konidena render any opinion regarding whether PPL Electric has shown that the proposed HV transmission line facilities contemplated by the subject letter of notification are “in compliance with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth” under 52 Pa. Code 57.76(a)(3)?
 - e. Does Mr. Konidena render any opinion regarding whether PPL Electric has shown that the proposed HV transmission line facilities contemplated by the subject letter of notification are “will have minimum adverse environmental impact, considering the electric power needs of the public, the state of available technology and the available alternatives” under 52 Pa. Code 57.76(a)(4)?

Response:

- a. No, Mr. Konidena does not render any opinion regarding the siting and construction of the HV transmission line facilities contemplated by the subject letter of notification because this is outside the scope of Mr. Konidena’s expertise.
- b. Mr. Konidena reiterates that his “testimony does not contest the need for the Tomhicken Switchyard to serve this customer”⁸ assuming that the customer identified in the letter of notification ultimately connects to the Project facilities⁹.
- c. No, this is outside the scope of Mr. Konidena’s expertise.
- d. No, this is outside the scope of Mr. Konidena’s expertise.

⁸ OCA Statement No.2 Page 45, Line 6-7.

⁹ OCA Statement No.2 Page 62, Lines 6-9.

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

**Supplemental OCA Response to Requests for Admissions and Interrogatories of PPL Electric Utilities Corporation
Set I to OCA**

- e. No, this is outside the scope of Mr. Konidena's expertise.

Supplemental Response:

- b. Mr. Konidena clarifies that his initial response is limited to acknowledging that OCA Statement 2 does not contest the need for additional transmission facilities to be built by PPL to serve the identified customer. However, Mr. Konidena denies that his testimony does not dispute the need for the Project insofar as the Commission's determination of need encompasses consideration of the potential positive and negative impacts of the Project on Pennsylvania's citizens and consumers.
- c. Mr. Konidena clarifies that his original response that a determination of whether the Project will create an unreasonable risk of danger to the health and safety of the public "is outside the scope of Mr. Konidena's expertise" was limited to PPL's claimed compliance with applicable Electrical Safety Code standards and other related legal requirements. Mr. Konidena does, however, offer an opinion regarding whether the Project, as proposed, could create an unreasonable risk of danger to the health and safety of the public based on the Project's anticipated operating conditions. Specifically, if the Project proceeds as proposed and the identified customer adds its projected load to the system, the resulting conditions may lead to thermal overloads and voltage violations. Accordingly, Mr. Konidena denies that the Project will not create an unreasonable risk of danger to the health and safety of the public.

Responding Witness: Rao Konidena
Response Date: September 16, 2026

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 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 :

VERIFICATION

I, Frank A. Felder, Ph.D., hereby state that the facts above set forth in my Supplemental Responses to PPL's Requests for Admission and Interrogatories, 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. Section 4904 (relating to unsworn falsification to authorities).

DATED: September 16, 2026

Signature: /s/ Frank A. Felder
Frank A. Felder, Ph.D.

Address: Independent Electricity
Consultants LLC
1855 Saint Francis Street
#1612
Reston, VA 20190

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 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 :

VERIFICATION

I, Rao Konidena, hereby state that the facts above set forth in my Supplemental Responses to PPL Requests for Admission and Interrogatories Set 1 to OCA, 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. Section 4904 (relating to unsworn falsification to authorities).

DATED: September 16, 2026

Signature: /s/ Rao Konidena
Rao Konidena

Address: Rakon Energy LLC
Roseville, MN 55113