Letter of Notification of PPL Electric Utilities Corporation for Approval to Construct the Susquehanna - Harwood 230 kV Transmission Line Taps Located in Luzerne County, Pennsylvania In-Person Evidentiary Hearing	Docket No.: A-2025-3059443

Pages 390 - 564

Hearing Room 4, Plaza Level

Commonwealth Keystone Building

400 North Street

Harrisburg, PA

INDEX TO EXHIBITS

Docket No. A-2025-3059443

Hearing Date: September 17, 2026

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PPL Response Set 2, Question 14

Exhibit Cross 3 466 479

PPL Response Set 2, Question 23

Exhibit Cross 4 473 479

PPL Response Set 10, Question 1

Zola Exhibit:

Exhibit Cross 1 483 488

OCA 1-3D

Exhibit Cross 2 487 488

Luzerne County Deniel

Exhibit 1 517 519

Zola Direct Testimony - HIGHLY CONFIDENTIAL

Exhibit 2 517 519

Zola Surrebuttal Testimony

PPL Exhibit:

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Testimony and Exhibit List

Hearing Exhibit 2 415 424

Letter of Notification

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Data Request Answer

Statement Exhibit 1 416 429

Joseph Lookup Direct Testimony

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Kyle Swartzentruber Direct Testimony

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Peter Sparhawk Direct Testimony

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Joseph Lookup Rebuttal Testimony with

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Statement Exhibit 2-R 417 424

Kyle Swartzentruber Rebuttal Testimony

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Peter Sparhawk Rebuttal Testimony

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Chad Huber Rebuttal Testimony

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John Taylor Rebuttal Testimony with

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Bethany Johnson Rebuttal Testimony with

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Joseph Lookup Rejoinder Testimony

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Kyle Swartzentruber Rejoinder Testimony

Statement Exhibit 5-RJ 418 499

John Taylor Rejoinder Testimony

Cook Exhibit:

Exhibit 1 521 529

Cook Direct Testimony -- HIGHLY CONFIDENTIAL

Exhibit 2 521 529

Cook Surrebuttal Testimony

Exhibit 1A 521 529

Department of Community Right to Know

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Governor Right to Know Request

Exhibit 7B 521 529

Answer to Governor Right to Know Request

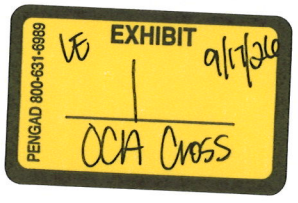
OCA Cross Examination Exhibit No.: 1

Date Entered: _____

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

Cover Page

Description: PPL Response to OCA Interrogatory II-7



WITNESS: Joseph B. Lookup

PPL Electric Utilities Corporation
Response to the Set II Data Requests of the
Office of Consumer Advocate (OCA)
Dated March 27, 2026
Docket No. A-2025-3059443

OCA II-7

Refer to PPL's Prehearing Memorandum submitted in this proceeding at Paragraph 17, which provides, in part: "PPL Electric intends to demonstrate that the Project is required to accommodate multiple customers' requests to serve new and future load in the area."

a. Are the "multiple customers" referenced inclusive of only the two potentially interconnecting Customers identified in the LON?
b. Compare with LON, page 2, note 2. Has PPL received additional information regarding the interconnection of the second Customer since the time the LON was filed which increases PPL's certainty regarding the interconnection of the second Customer? If so, please provide all studies, contracts, or other documents supporting its improved certainty to the extent not otherwise provided.

PPL Electric Response

a. There is one additional customer that is anticipated to interconnect at the Tomhicken 230 kV Substation that the proposed Project is needed for.
b. PPL Electric has not signed an ESA with the additional customer.

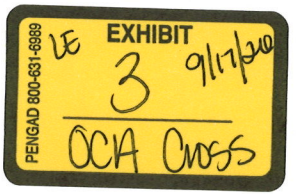
OCA Cross Examination Exhibit No.: 3

Date Entered: _____

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

Cover Page

Description: PPL Response to OCA Interrogatory II-23



WITNESS:Joseph B. Lookup

PPL Electric Utilities Corporation
Response to the Set II Data Requests of the
Office of Consumer Advocate (OCA)
Dated March 27, 2026
Docket No. A-2025-3059443

OCA II-23

Does PPL consider resource adequacy (i.e., the availability of sufficient generation and energy resources to serve load interconnected to the grid) to be an aspect of reliable service? Explain.

PPL Electric Response

Resource adequacy is required for Electric Distribution Companies ("EDCs") to provide reliable service, however, EDCs cannot own generation to ensure resource adequacy. Rather Pennsylvania retail customers rely on the competitive generation markets to ensure resource adequacy. Furthermore, EDCs have a statutory obligation to provide non-discriminatory access to the competitive generation offerings.

OCA Cross Examination Exhibit No.: _____

Date Entered: _____

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Cover Page

Description: PPL Response to OCA Interrogatory II-23

WITNESS:Joseph B. Lookup

PPL Electric Utilities Corporation
Response to the Set II Data Requests of the
Office of Consumer Advocate (OCA)
Dated March 27, 2026
Docket No. A-2025-3059443

OCA II-23	Does PPL consider resource adequacy (i.e., the availability of sufficient generation and energy resources to serve load interconnected to the grid) to be an aspect of reliable service? Explain.
PPL Electric Response	Resource adequacy is required for Electric Distribution Companies ("EDCs") to provide reliable service, however, EDCs cannot own generation to ensure resource adequacy. Rather Pennsylvania retail customers rely on the competitive generation markets to ensure resource adequacy. Furthermore, EDCs have a statutory obligation to provide non-discriminatory access to the competitive generation offerings.

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Cover Page

Description: PPL Response to OCA Interrogatory X-1

WITNESS: Joseph B. Lookup

PPL Electric Utilities Corporation
Response to the Set X Data Requests of the
Office of Consumer Advocate (OCA)
Dated May 21, 2026
Docket No. A-2025-3059443

OCA X-1

Refer to PPL Statement 2, the Direct testimony of Kyle Swartzentruber, page 2, line 2: "…to a new customer-owned 230-34kV substation (the 'Project')" and page 2:23-3:1: "The Project is designed to comply with PPL Electric's obligation to provide service to customers upon a request subject to reasonable terms and conditions and, more specifically, to serve the request of one new customer ('Customer')…."

a. Will the customer bring its own capacity? If so, how much?
b. Will the customer be co-located with existing generation?
c. Will the customer be subject to PJM's proposed connect and manage policy? If so, how much?
d. Will the customer participate in PJM's proposed centralized Reliability Procurement? If so, how much?
e. Please define PPL Electric's obligation to provide service, how it applies to existing customers, how it applies to new customers, and how PPL analyzes the impact of reliability on existing customers by adding new customers in a period of supply shortages.
f. Which provisions, if any, of the PA PUC's Model Large Load Tariff (see Final Order entered May 12, 2026, at Docket No. M-2025-3054271) will the New Customer comply with?
g. What is the impact on PJM resource adequacy and loss of load expectation due to the New Customer?
h. What is the energy, capacity, and ancillary cost impact to PPL customers due to the New Customer?
i. Is the New Customer compliant with the White House Ratepayer Protection Pledge?1
j. Has PPL requested information from the New Customer regarding whether the New Customer will take default service from PPL or has contracted for retail electric generation supply service from a retail supplier?
    i. If yes, does PPL routinely request confirmation that new, interconnecting large load customers

have secured adequate supply either through default or service or a retail electric generation supplier?

ii. If not, explain why not.

PPL Electric Response

a. PPL Electric is unaware of whether the customer will bring its own capacity. PPL Electric is an electric distribution company, and the customer is free to acquire its own competitive generation supply.
b. No.
c. PJM's connect and manage ("CAM") policy has not been finalized. The Company will not know whether the customer will be subject to the CAM policy until it has been finalized.
d. PJM's proposed centralized Reliability Procurement has not be finalized. PPL Electric does not know whether the customer will participate in PJM's proposed centralized reliability procurement.
e. PPL Electric has an obligation to provide non-discriminatory service to existing and new customers. The Company is further obligated to provide non-discriminatory access to the competitive generation markets. PPL Electric does not control the availability of generation supply.
f. The Model Large Load Tariff is a guidance document. The customer will be subject to the Company's LP-6 rate schedule when it goes into effect on July 1, 2026.
g. PPL Electric has not made this projection. The Company is an electric distribution company and has no control over generation supply.
h. PPL Electric has not made this projection. The Company is an electric distribution company and has no control over generation supply.
i. PPL Electric has not evaluated whether the customer is compliant with the White House Ratepayer Protection Pledge.
j. No. the new customer has the ability to choose between default service from PPL Electric or contract for retail electric generation supply service from an electric generation supplier. PPL Electric does not request confirmation that large load customers have secured adequate supply. Under current laws the Company is obligated to provide open non-discriminatory access to generation markets. The Company has no control over the adequacy of generation supply in the market.

WITNESS: Joseph B. Lookup

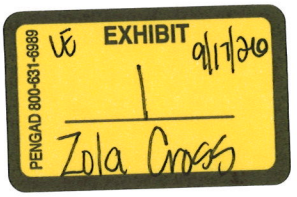
PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Office of Consumer Advocate (OCA)
Dated March 27, 2026
Docket No. A-2025-3059443

Zola Cross
Exhibit No 1
Date _____

OCA I-3

Please refer to the Letter of Notification (LON) page 5, "It is anticipated that this load will increase in stages to approximately 1,980 MW by 2033. Due to the size of the requested load, the Customer will be most appropriately supplied from the 230 kV network, which is considered to be transmission level service. As the Customer's load continues to ramp up, additional improvements to the 230 kV network in this area will be required to continue to provide reliable service to the area."

a. Please state the source of the projection that the Customer's load will increase to approximately 1,980 MW by 2033, including whether this projection was provided by the Customer, developed independently by PPL Electric, or derived from a PJM interconnection study or other third-party analysis. Please provide all documents supporting this projection.
b. Please describe what contractual, tariff, or other binding obligation, if any, the Customer has made to PPL Electric with respect to achieving the projected 1,980 MW load level by 2033. If no binding commitment exists, please explain what recourse PPL Electric or its ratepayers have if the Customer's actual load falls materially short of the projection.
c. Please provide PPL Electric's analysis, if any, of the following load forecast scenarios and their impact on the necessity and cost justification for the proposed Project:
    i. Customer load reaches 240 MW initial load but does not increase beyond that level;
    ii. Customer load reaches 500 MW by 2033;
    iii. Customer load reaches 965 MW by 2031 as referenced in Attachment 1;
    iv. Customer load reaches 1,980 MW by 2033 as referenced in the LON;
    v. Customer terminates service or significantly reduces load prior to 2033.



vi. For each scenario, please state whether the proposed Project remains necessary and cost-justified, and whether the 64/36 cost allocation between ratepayers and the Customer would change.

d. Please identify all additional transmission improvements that PPL Electric anticipates will be required to serve the Customer's projected load growth through 2033, including but not limited to the Future Phase facilities depicted in Figure 1-2. For each anticipated improvement please state:
   i. A description of the facility or improvement;
   ii. The estimated cost;
   iii. The anticipated in-service date;
   iv. Whether PPL Electric intends to seek PUC approval through a future LON or other filing; and
   v. The anticipated cost allocation between ratepayers and the Customer.

e. Please state the total estimated cost to ratepayers of all transmission improvements — including both the proposed Project and all anticipated future improvements identified in response to (d) — required to serve the Customer's projected load growth from the initial 240 MW to 1,980 MW by 2033.

f. Please state whether PPL Electric performed a stranded cost analysis or uneconomic facilities analysis assessing the risk to ratepayers if the Customer's load does not materialize as projected, and if so provide that analysis. If no such analysis was performed, please explain why not.

PPL Electric Response

a. See response to OCA I-1. The Customer's load will increase to 965 MW by approximately December 2029. The Customer provided load ramp schedules, which were the basis for the projected loads.

b. See OCA I-1 HIGHLY CONFIDENTIAL Attachment 1.

c.
   i. The proposed Project is needed to serve the Customer's initial load of 240 MW and above. The Customer is obligated to pay for transmission service equal to the amount of the initial cost of the proposed

Project that is being recovered through transmission rates, regardless of the Customer's actual peak demand. See OCA I-1 HIGHLY CONFIDENTIAL Attachment 1.

ii. See response to OCA I-3.c.i.

iii. See response to OCA I-3.c.i.

iv. See response to OCA I-3.c.i. See response to OCA I-1; the Customer's load will reach 965 MW by December 2029.

v. See response to OCA I-3.c.i.

vi. See response to OCA I-3.c.i. The proposed Project would be needed in all of the above scenarios. The cost allocation was determined based upon whether the upgrades solely benefit the Customer, or if the upgrades provide broader grid benefits. The cost allocation would remain the same in all of the above scenarios. Likewise, the Customer would remain obligated to pay transmission rates equal to the amount of the proposed Project that is being recovered through transmission rates in all of the above scenarios.

d. 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 Sunbury-Susquehanna # 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 cost allocation is provided in OCA I-1 HIGHLY CONFIDENTIAL Attachment 1.

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.

e. See response to OCA I-3.d.

f. No such analysis was performed. The stranded cost risk has been mitigated by the customer's minimum load guarantee in the ESA.

Zola Cross Exhibit No 2
Date

NP HAZLETON HOLDINGS, LLC,	:	**IN THE COURT OF COMMON PLEAS**
Plaintiff	:	**OF LUZERNE COUNTY**
v.	:	
	:	**CIVIL ACTION LAW**
THE HAZLE TOWNSHIP BOARD OF SUPERVISORS,	:	
Defendant	:	**2025-13744**

PROTHONOTARY/LUZERNE COUNTY
FILED MAY 26 '26 PM 3:04

ORDER

AND NOW, this 26th day of May, 2026, upon review of the Land Use Appeal (Docket Entry #1, filed 12/12/25), Plaintiff's Brief (Docket Entry #6, filed 1/12/26) and Exhibits (Docket Entries 20-28, 31-77 filed 4/20/26), Brief in Opposition (Docket Entry #82, filed 5/1/26 by the Intervenors), Brief of Hazle Township (Docket Entry #84, filed 4/30/26), this Court finds as follows:

1) The Land Use Appeal is DENIED at this time;
2) This Court is remanding this matter to the Hazle Township Zoning Hearing Board to make further determinations;
3) That NP Hazleton Holdings shall be permitted to make application to the Board for a special exception and/or in addition can challenge, on substantive grounds, the validity of the Hazle Township Zoning Ordinance as applied to Applicant's proposed use of the premises, situated at Luzerne County, Pennsylvania pursuant to 53 P.A. §10916.1 et seq. The Board's proceedings shall be conducted in accordance with applicable Hazle Township Zoning Ordinance and Pennsylvania Municipalities Planning Code requirements and any agreed to by the parties; and

PENGAD 800-631-6989 LE EXHIBIT 2 9/17/26 Zola Cross

4) That subsequent to the receipt of the application and/or challenge by the Board, a Hearing shall be held at a location determined by the Board on a date in accordance with 53 P.S. § 10916.1.

The Clerk of Judicial Records/Prothonotary is directed to serve notice of the entry of this Order pursuant to Pa.R.C.P. 236.

BY THE COURT:

LESA S. GELB

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Zola Exhibit
1

Public Comment/Testimony

Necessity for This Project

PPL has not demonstrated that this transmission project is necessary.

This proposed transmission project is intended to serve the planned data center campus known as Project Hazelnut located in Humboldt Industrial Park in Hazle Township Pennsylvania. The developer is NorthPoint Development, a Kansas City based firm.

The customer nor the developer currently have the required land use approvals to construct the data center campus. The project was unanimously denied by the Hazle Township Board of Supervisors. That decision was appealed to the Luzerne County Court of Common Pleas, where the denial was upheld. The matter is now on appeal before the Pennsylvania Commonwealth Court.

Because the underlying project has not received the approvals necessary to proceed, and there is no certainty that it ever will, granting electric infrastructure for this development at this stage is premature. Approving this project before the customer has legal authorization to build would be a disservice to the ratepayers throughout PPL's service territory.

Future Customer Need Is Speculative

The evidence available to me does not demonstrate a proven need for this project.

While future growth and increased demand are frequently discussed, those projections remain speculative. There has been no conclusive demonstration that this transmission line is necessary today.

For that reason, I believe PPL's application is premature and should not be approved until an actual, demonstrated need exists. Doing so protects both the electric grid and the customers who ultimately bear the costs.

Electric Grid Capacity

This project should not be approved given the existing demands already being placed on Pennsylvania's electric grid.

The Susquehanna Nuclear Power Plant generates approximately 2,514 megawatts of electricity. The AWS data center campus in Salem Township has reportedly secured up to 1,920 megawatts, or approximately 76% of that generating capacity.

Project Hazelnut has requested approximately 965 megawatts by 2030. Combined, these demands would exceed the plant's generating capacity by approximately 371 megawatts before accounting for additional proposed data center developments throughout the region.

This also does not account for the electricity needed to serve homes, schools, hospitals, and businesses that depend on reliable electric service every day.

Approving projects that require additional long-distance transmission infrastructure will result in more transmission lines crossing both public and private property while placing additional financial burdens on ratepayers.

Cost to Ratepayers

PPL customers have already experienced significant increases in electric bills over the past several years, with many reporting increases approaching 27%.

If this project and its future phases are approved, ratepayers could ultimately bear hundreds of millions of dollars in additional infrastructure costs.

Families across Pennsylvania are already struggling with rising living expenses. Many are forced to choose between paying utility bills and meeting other basic household needs. Small businesses and working families simply cannot afford additional electric rate increases to subsidize infrastructure that primarily benefits large private corporations.

Reliability

PPL has not demonstrated that this project is necessary to maintain system reliability.

Based on PPL's own reporting, the existing electric system has performed reliably. The system reportedly maintained reliability approximately 98.5% of the time during the study period and exceeded 80% capacity only about 1.5% of the time over a five-year period.

These figures suggest there is no current reliability issue requiring this transmission project.

Large Load Customers Should Supply Their Own Power

Our local electric grid has been shown to operate reliably under current conditions. It risks becoming less reliable if extremely large-load customers are connected without providing their own clean generation resources.

Large energy users such as proposed data center campuses should be required to develop site-specific clean power generation dedicated to serving their own facilities.

Doing so would:

- **Reduce strain on the regional electric grid.**
- **Eliminate or reduce the need for additional transmission lines.**
- **Protect ratepayers from unnecessary infrastructure costs.**
- **Ensure that the companies receiving the financial benefit from these projects bear the cost of serving their own clean energy needs.**

Companies capable of investing billions of dollars in data center development should also be capable of investing in the clean energy infrastructure required to support those operations rather than shifting those costs onto Pennsylvania families and businesses.

Closing

Thank you for the opportunity to provide my testimony today.

I respectfully ask the Commission to carefully consider whether this project has been shown to be necessary, whether the underlying customer has the legal ability to proceed with its development, and whether approval is in the best interests of Pennsylvania's electric customers.

For these reasons, I respectfully request that the Commission deny this application until a demonstrated need exists and the underlying project has received all required approvals.

Zola Exhibit
2

Via Electronic Mail Only

September 4, 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,

Enclosed for filing with the Pennsylvania Public Utility Commission is the Surrebuttal Testimony of John Zola to the in the above-referenced matter.

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

Respectfully,



John Zola
17 Dagostin Road
Sugarloaf, PA 18249
zolajj@gmail.com
570-436-3089

Enclosures

Matthew L. Homsher, Secretary

September 4, 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, John Zola, Pro Se Protestant, have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, Surrebuttal Testimony of John Zola, 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 4th day of September 2026.

VIA E-MAIL

Jacob Guthrie (JGuthrie@paoca.org)
Olivia M Spergel (OSpergel@paoca.org)
Melanie Joy El Atieh (melatieh@paoca.org)
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555 Walnut Street, 5th Floor Forum Place, Harrisburg, PA 17101-1923
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September 4, 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	:	

Surrebuttal Testimony of John Zola

I. Surrebuttal to Joseph Lookup rebuttal statement number 1-R page number IV, necessity of the Tomhicken 230 kV Switchyard Project.

Mr. Lookup says repeatedly that the company is not in the business of building transmission lines to nowhere that serve no purpose, yet that is precisely what he is asking the commission to approve. It is indisputable that the customer does not exist and future projects are pure speculation and are not based in fact. This project has no basis for approval at this point in time.

II. Surrebuttal to Chad Huber rebuttal statement number 4-R land and row concerns. Information session held at the Valley Country Club

Mr. Huber states that the company used their standard approach and configuration of public open houses. Mr. Huber fails to explain that no public education or information was previously provided so the public understood the company's protocol for such an event. Approximately 300 people packed

the room elbow to elbow making individual stations impossible. The public selected one person to ask questions on behalf of the people and the company refused to answer any of them. The questions were reasonable and should have been easy for professionals of the company to answer. It appeared to us that the information meeting was only to provide information the company wanted to provide and not truly answer questions or concerns of the people that would be affected by the project. In my opinion it was nothing more than a dog and pony show designed to check a required box with no true intention to inform the public.

In conclusion, I do not believe that PPL has met the burden of proving that the need for this Project is paramount for the health, safety and welfare of the Public.

Wherefore, for the foregoing reasons, I, John Zola, pro se Protestant, respectfully requests that the Commission enter an Order Denying PPL Electric's Letter of Notification until PPL can prove that it is paramount for the health, safety and welfare of the Public.

Respectfully,



John Zola
17 Dagostin Road
Sugarloaf, PA 18249
zolajj@gmail.com
570-436-3089

VERIFICATION

I, John Zola, 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: September 4, 2026



John Zola, Pro Se Protestant

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 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	:	Docket No. A-2025-3059443

Evidence, Testimony, and Exhibits of

PPL Electric Utilities Corporation

I. PPL Electric Hearing Exhibit No. 2 - Letter of Notification (Filed December 19, 2025)

a) Attachment 1 – Necessity Statement

b) Attachment 2 – Engineering Statement

c) Attachment 3 – Description of Project Area

d) Attachment 4 – PPL Electric Design Criteria and Safety

e) Attachment 5 – Agency and Landowner list

II. PPL Electric Direct Testimony (Served May 13, 2026)

a) PPL Electric Statement No. 1 – Direct Testimony of Joseph Lookup

b) PPL Electric Statement No. 2 – Direct Testimony of Kyle Swartzentruber

c) PPL Electric Statement No. 3 – Direct Testimony of Peter Sparhawk

d) PPL Electric Statement No. 4 – Direct Testimony of Austin Weseloh

III. PPL Electric Rebuttal Testimony (Served August 7, 2026)

a) PPL Electric Statement No. 1-R – Rebuttal Testimony of Joseph Lookup
   i. PPL Electric Exhibit JBL-1R
b) PPL Electric Statement No. 2-R – Rebuttal Testimony of Kyle Swartzentruber
c) PPL Electric Statement No. 3-R – Rebuttal Testimony of Peter Sparhawk
d) PPL Electric Statement No. 4-R – Rebuttal Testimony of Chad Huber
e) PPL Electric Statement No. 5-R – Rebuttal Testimony of John D. Taylor
   i. PPL Electric Exhibit JDT-1R
f) PPL Electric Statement No. 6-R – Rebuttal Testimony of Bethany L. Johnson
   i. PPL Electric Exhibit BLJ-1R through BLJ-3R

IV. PPL Electric Rejoinder Testimony (Served September 14, 2026)

a) PPL Electric Statement No. 1-RJ – Rejoinder Testimony of Joseph Lookup
b) PPL Electric Statement No. 2-RJ – Rejoinder Testimony of Kyle Swartzentruber
c) PPL Electric Statement No. 5-RJ – Rejoinder Testimony of John D. Taylor

Post & Schell P.C.
ATTORNEYS AT LAW

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Garrett P. Lent
Principal

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717-612-6032 Direct
717-731-1985 Direct Fax
File #: 209803

December 19, 2025

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 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-_____

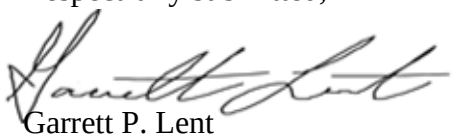
Dear Secretary Homsher:

Attached for filing is the Letter of Notification of PPL Electric Utilities Corporation ("PPL Electric") in the above-referenced proceeding. As indicated on the Certificate of Service, copies of the Letter of Notification are being served by certified mail, return receipt requested, upon the involved governmental agencies, municipalities, and property owners. Construction of the Project will commence upon the Commission's approval of this filing, with an estimated construction start date March 30, 2026, with an anticipated in-serve date of December 15, 2026.

If you have any questions concerning this matter, please contact me at the address or telephone numbers provided above.

The associated $350.00 filing fee has been paid by Post & Schell, P.C. as of the time of filing.

Respectfully submitted,



Garrett P. Lent

GPL/dmc
Attachment

cc: Deb Backer (*via email; w/attachment*)
Jordan Van Order (*via email; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Letter of Notification 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 CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Pennsylvania Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building 400 North Street
2nd Floor, Room-N201
Harrisburg, Pennsylvania 17120
Attn: Alison Kaster

Pennsylvania Department of Environmental Protection
400 Market Street
10th Floor Rachel Carson State Office Building
Harrisburg, Pennsylvania 17101
Attn: Regional Permit Coordination Office

Pennsylvania Department of Transportation
Commonwealth Keystone Building
400 North Street, Fifth Floor
Harrisburg, Pennsylvania 17120
Attn: Jeffrey M. Spotts, Chief Counsel

Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, Pennsylvania 17120-0053
Attn: Catherine N. Lantzy, Chief Counsel

Pennsylvania Department of Conservation and Natural Resources
Rachel Carson State Office Building
400 Market Street
Harrisburg, Pennsylvania 17105-8767
Attn: Rebecca Bowen, Chief, Conservation Science & Ecological Resources Division

Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, Pennsylvania 17110-9797
Attn: Timothy Haydt, Director, Bureau of Wildlife Habitat Management

Pennsylvania Fish and Boat Commission
Centre Region Office
595 East Rolling Ridge Drive
Bellefonte, Pennsylvania 16823-9620
Attn: Christopher A. Urban, Chief, Natural Diversity Section

Pennsylvania Office of Consumer Advocate
555 Walnut Street 5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923
Attn: Darryl A. Lawrence, Consumer Advocate

Pennsylvania Office of Small Business Advocate
555 Walnut Street
1st Floor Forum Place
Harrisburg, Pennsylvania 17101
Attn: NazAarah Sabree, Small Business Advocate

U.S. Army Corps of Engineers
Baltimore District Corporate
Communication Office
2 Hopkins Plaza
Baltimore, Maryland 21201
Attn: Planning Division

U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Road, Suite 101
State College, Pennsylvania 16801
Attn: Jodie Mamuscia, Field Office Supervisor

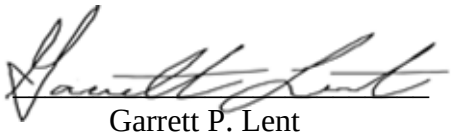
Luzerne County Planning Commission
200 North River Street
Wilkes-Barre, Pennsylvania 18711
Attn: N. Brian Caverly, Chair

Luzerne County Conservation District
325 Smiths Pond Road
Shavertown, Pennsylvania 18708
Attn: John (Jay) Wilkes, Chairman and Public Director

Hazle Township
P.O. Box 506,
Harleigh, PA 18225

NP Hazleton Holdings 1, LLC
3315 North Oak Trafficway,
Kansas City, Missouri 64116

Dated: December 19, 2025



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 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	:	Docket No. A-2025-_____

LETTER OF NOTIFICATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric" or the "Company") hereby files this Letter of Notification pursuant to Sections 57.72(d)(1)(iii) and (vi) of the Pennsylvania Public Utility Commission's ("PUC" or the "Commission") regulations, 52 Pa. Code § 57.72(d)(1)(iii) and (vi), 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 & #2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard (the "Project"). 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 are located in Hazle Township, Luzerne County, Pennsylvania.[1]

[1] For a complete list of municipalities and counties crossed by the Project, please refer to **Attachment 5** to this Letter of Notification.

The Company received multiple load requests, and the scope to serve these load requests will be performed in two phases.[2] As explained in greater detail below, the first phase of the Project ("Phase 1"), subject to this Letter of Notification, is needed to connect one of the requesting customers (the "Customer") who is requesting transmission level service in Hazle Township, Luzerne County, Pennsylvania to the 230 kV system. PPL Electric's system planners determined that splitting the adjacent Susquehanna-Harwood #1 & #2 230 kV Transmission Lines, creating the Susquehanna-Tomhicken #1 & #2 230 kV and Tomhicken-Harwood #1 & #2 230 kV lines, and providing 230 kV service from the new Tomhicken 230kV Switchyard is the optimal solution to serve the Customer's initial requested load. The second phase of transmission expansion ("Phase 2") is needed to address future electrical needs and demands associated with this Customer and with other load requests, as well as PPL Electric's system needs. However, Phase 2 is not the subject of this Letter of Notification, and will be the subject of a future submission before the Commission.[3]

Subject to the Commission's approval, construction will begin on March 30, 2026 to support an in-service date of December 15, 2026. PPL Electric will own, operate, and maintain the new Tomhicken Switchyard, 230 kV Tap Lines, and Connecting Lines. The Customer will construct, own, operate, and maintain their 230-34 kV substation. The total estimated cost of this Project, as described below, is approximately $59.9 Million.

In support thereof, PPL Electric states as follows:

[2] While the instant LON is needed forthwith to connect the Customer to the 230kV grid through the Customer-owned substation and the Tomhicken Switchyard, PPL Electric did receive more than one customer request for transmission level service. As such, PPL Electric anticipates that the Tomhicken Switchyard will eventually interconnect to a second, customer-owned substation. However, any future project or constructions needed to interconnect the other requesting customer will be undertaken as the subject of a future, standalone filing before the Commission.

[3] Additional detail regarding Phase 2 is provided for informational purposes only in **Attachment 1 – Necessity Statement**.

I. INTRODUCTION

1. This Letter of Notification is filed by PPL Electric, a public utility that provides electric distribution, transmission, and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. PPL Electric's address is as follows:

PPL Electric Utilities Corporation
827 Hausman Road
Allentown, Pennsylvania 18104

3. PPL Electric's attorneys are:

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)
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: hwilburn@postschell.com

PPL Electric's attorneys are authorized to receive all notices and communications regarding this Letter of Notification.

4. PPL Electric furnishes electric service to approximately 1.5 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. PPL Electric is a "public utility" and an "electric distribution company" as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

5. PPL Electric owns approximately 5,000 miles of transmission lines operating at 69 kV (kilovolts) or higher, approximately 375 substations with a capacity of 10 MVA (megavolt

amperes) or more, and approximately 43,000 miles of distribution lines operating at less than 69 kV.

6. This Letter of Notification includes the following accompanying Attachments:

- Attachment 1 Necessity Statement.
- Attachment 2 Engineering Statement.
- Attachment 3 Description of Project Area.
- Attachment 4 PPL Electric Design Criteria and Safety.
- Attachment 5 Agency and Landowner List.

7. This Letter of Notification and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa. Code § 57.72(d)(4).

II. THE PROJECT

A. NEED FOR THE PROJECT

8. PPL Electric has a right and obligation to provide retail electric service in a manner that is efficient, safe, reliable, and resilient to meet the needs of the electric system and the service expectations of its customers. To meet this duty, PPL Electric applies its transmission asset management planning procedure, which includes system performance and condition assessments. These performance and condition assessments identify system needs and prioritize projects based on several variables such as equipment age, condition, maintenance schedule, customer needs, and impact on system reliability and performance to ensure a reliable electric grid and reasonable service to its customers.

9. As explained in greater detail below and in **Attachment 1 – Necessity Statement**, this Project is necessary to accommodate multiple customer requests to serve new and future load located in Hazle Township, Luzerne County, Pennsylvania.

10. The Project will most immediately serve the substation-owning Customer, who is requesting 230 kV electrical service with an in-service date of December 15, 2026 and an initial load of 240 megawatts ("MW"). It is anticipated that this load will increase in stages to approximately 1,980 MW by 2033. Due to the size of the requested load, the Customer will be most appropriately supplied from the 230 kV network, which is considered to be transmission level service. As the Customer's load continues to ramp up, additional improvements to the 230 kV network in this area will be required to continue to provide reliable service to the area.

11. Expedient initiation of adequate and reliable service to new high-load customers seeking to enter PPL Electric's system is critical for the Commonwealth of Pennsylvania's continued economic development. This interest is addressed by the Project. Moreover, high-load customers connecting to PPL Electric's Bulk Electric System ("BES") will ultimately reduce the transmission rates charged by PPL Electric to its other transmission level customers. The Project would further that interest and result in lower rates for other of PPL Electric's transmission level customers.

12. The Project as proposed addresses the prospective Customer's high-load transmission service in a cost-efficient manner, as opposed to the alternatives evaluated by PPL Electric, such as expanding the existing Harwood 230 kV Substation. Project alternatives are addressed at further length in **Attachment 1 – Necessity Statement**.

13. Further, the Project as proposed produces reliability benefits by creating another path for power to travel south from the Susquehanna 230 kV Switchyard. This will increase operational flexibility, improve the Company's ability to take line outages in the area, and improve overall 230 kV system reliability. These benefits are further explained in **Attachment 1 – Necessity Statement**.

14. Additionally, the Project as proposed will produce net economic benefits for the Commonwealth of Pennsylvania, and for PPL Electric's other transmission-level ratepayers, as explained in further length below and in **Attachment 1 – Necessity Statement**. Therefore, and for the reasons more fully explained below, the Commission should approve the Project as proposed.

1. Existing System

15. The Susquehanna-Harwood #1 & #2 230 kV lines are part of PPL Electric's 230 kV Bulk Electric network.

16. These transmission lines transfer power south from the Susquehanna 230 kV Switchyard (near the Susquehanna Nuclear Station) to the Harwood 230-69 kV Substation (Luzerne County), East Palmerton 230-69 kV Substation (Carbon County), and Siegfried 230-138-69 kV Substation (Northampton County).

17. The Susquehanna Switchyard and Siegfried Substation are connected to multiple other 230 kV lines. The 230 kV network moves power from the generators to regional supply substations.

18. At the regional substations, the 230 kV is stepped down to 69 kV and/or 138 kV. The distribution substations in the surrounding area are supplied via transmission lines operating at 69 kV or 138 kV.

19. The existing double-circuit 230 kV transmission lines include 1113 kcmil[4], 54/19 stranding, "Finch" ACSS[5] conductor wires and are supported by double-circuit steel lattice towers. The arrangement also includes two optical ground wires ("OPGW").

[4] A kcmil is a thousand circular mils. A circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm^2.
[5] ACSS stands for aluminum conductor steel supported.

20. A map of the existing system configuration is provided as **Figure 1-1,** in **Attachment 1 – Necessity Statement.**

2. Identification of Need

21. While the Company anticipates that this Project will eventually facilitate service multiple customers, due to multiple customer requests, the Project is immediately needed to serve a new prospective Customer located in Hazle Township.

22. The prospective Customer is requesting 230 kV electrical service with an in-service date of December 15, 2026 and an initial load of 240 MW. The Customer's load will increase in stages to approximately 1,980 MW by 2033.

23. PPL Electric will carry out the projects necessary to serve this Customer's load request in two separate phases. Phase 1, subject to this Letter of Notification, is needed to connect the Customer requesting transmission-level service in Hazle Township, Luzerne County, Pennsylvania to the 230 kV system. PPL Electric's system planners determined that splitting the adjacent Susquehanna-Harwood #1 & #2 230 kV Transmission Lines, creating the Susquehanna-Tomhicken #1 & #2 230 kV and Tomhicken-Harwood #1 & #2 230 kV lines, and providing 230 kV service from the proposed Tomhicken Switchyard is the optimal solution to serve the Customer's initial requested load.

24. As described in **Attachment 1 – Necessity Statement**, Phase 2 will be needed to address the Customer's future electrical needs and demands, as well as PPL Electric's system needs. Phase 2 will be submitted in a subsequent filing, which PPL Electric anticipates may necessitate a full siting application. PPL Electric notes that the phases are being submitted separately because only the first phase is required to meet the Customer's in-service request; Phase 2 will not be necessary until the Customer's load increases at a future date. Phase 1, i.e., the Project,

is located entirely on property owned by the Customer or by PPL Electric and, as such, requires a Letter of Notification only.

25. Moreover, high-load customers connecting to PPL Electric's BES will ultimately reduce the transmission rates charged by PPL Electric to its other transmission level customers. The Project would further that interest and result in lower rates for other of PPL Electric's transmission level customers.

B. THE PROPOSED PROJECT

26. To appropriately serve the prospective Customer's initial load and limit impacts to the local community, PPL Electric proposes to build the Tomhicken 230 kV Switchyard, which will be a new breaker-and-a-half 230 kV switchyard, and extend four 230 kV lines to the Customer's substation, all located within the Customer-owned parcel ("Proposed Solution"). The Tomhicken 230 kV Switchyard is required due to the number of lines needed by the Customer and the size of the requested load.

27. The new Tomhicken 230 kV Switchyard will be constructed in a breaker-and-a-half arrangement.

28. Under Section III of PJM's minimum planning and design standards, three terminal lines and radial bus station configurations are both discouraged for use in new BES substation construction because of the considerable potential for detrimental effects on transmission system reliability.

29. The proposed Tomhicken 230 kV Switchyard will be constructed on the same Customer-owned parcel as the Customer's 230-34 kV substation and facilities. PPL Electric will acquire the necessary land and right-of-way ("ROW") from the customer for the new Tomhicken 230 kV Switchyard, Tap Lines, and Connecting Lines.

30. Building the Tomhicken 230 kV Switchyard on the Customer-owned parcel is optimal since PPL Electric has existing 230 kV transmission lines traversing the property. The Proposed Solution will allow PPL Electric to break the transmission lines on the customer owned parcel and extend them to the new switchyard; significantly reducing impacts to landowners and the surrounding environment by limiting the amount of new transmission line construction necessary to connect the new 230 kV switchyard to the electric grid.

31. The new Tomhicken 230 kV Switchyard will be located adjacent to the customer-owned 230-34 kV substation, further limiting the amount of impact and new transmission facilities required. The Tomhicken 230 kV Switchyard will also provide additional operational flexibility to serve customer load and meet future system needs.

32. The Project will require the construction of approximately 1.1 miles of new 230 kV transmission lines to connect the existing Susquehanna-Harwood #1 & #2 230 kV lines into the new Tomhicken 230 kV Switchyard.

33. The Project will also extend two new 230 kV transmission lines for approximately 0.1 miles from the new Tomhicken Switchyard to the new Customer-owned 230-34 kV substation. This Project is part of PJM Supplemental Number S3528, specifically segments S3528.1, S3528.6, and S3528.11.

34. The additional paths from the Susquehanna 230 kV Switchyard to the Tomhicken and Harwood 230 kV Switchyards will prevent the thermal overload of the Susquehanna-Tomhicken #1 & #2 230 kV and Tomhicken-Harwood #1 & #2 230kV lines.

35. These upgrades will also increase the operational flexibility and resiliency of the 230 kV system and allow for future load growth. These reinforcements will be submitted in a separate PUC filing.

36. Phase 1, the Proposed Solution here, will allow PPL Electric to provide safe and reliable transmission-level service to the customer while maintaining the reliability of the BES. Additionally, this solution is the least impactful option to landowners and the local community among the feasible alternatives. A map of the proposed system alignment is provided as **Figure 1-2** in **Attachment 1 – Necessity Statement**.

37. Importantly, as explained in **Attachment 1 – Necessity Statement**, the Project as proposed also avoids significant environmental, community, and landowner impact as compared to the new installation contemplated by PPL Electric.

38. This Project will allow PPL Electric to serve the Customer in an adequate, efficient, safe, and reliable manner, as required by the Public Utility Code, while meeting the minimum design standards set forth by PJM, as described in **Section 3.0 of Attachment 1 – Necessity Statement**. 66 Pa.C.S. § 1501. The estimated cost of the Project is $59.9 million. PPL Electric serves customers taking service at 69 kV and above at its LP-5 rate class. Pursuant to Rule 4(C)(4) of the Company's Commission-approved tariff, LP-5 customers are required to pay for costs of upgrades necessary to serve their load. Tariff Rule 4(C)(4) Supp. No. 194 to Electric Pa. P.U.C. No. 201, Tenth Revised Page No. 8.[6] However, certain upgrades that also benefit other PPL Electric customers and/or the transmission grid may be excluded from the interconnecting customer's obligation and added to PPL Electric's transmission rate base. As such, it is PPL Electric's policy that upgrades to the networked BES made in connection with LP-5 customer interconnections will generally be excluded from the customer's obligation and be included in transmission rate bases. At a minimum, the cost of the customer's direct connection facilities is the sole responsibility of the connecting customer. Other upgrades, including PPL Electric

[6] PPL Electric currently has a pending base rate proceeding at Docket No. R-2025-3057164. As a part of this proceeding, PPL Electric has proposed revisions to Rate LP-5.

substations/switchyards will be evaluated on a case-by-case basis to determine if the upgrades provide benefits to other customers and/or the transmission grid. Examples of benefits to other customers that would cause an upgrade to be included in transmission rates include, but are not limited to:

- Added system reliability;
- Increased capacity/lower congestion;
- Lower impedance;
- Improved asset condition of existing facilities;
- Service to multiple transmission customers and/or retail feeders;
- Increased resiliency and operational flexibility;
- Expanded capacity for new generation flow and interconnections

39. Based on a review of the proposed system improvements derived from this Project, it was determined that PPL Electric is responsible for approximately $38.4 Million (~64% of the total Project costs) and the Customer is responsible for approximately $21.8 Million (~36% of the total Project costs).

III. HEALTH AND SAFETY

40. The Tap Lines and Connecting Lines will not create any unreasonable risk of danger to public health or safety. The proposed lines will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code ("NESC") minimum standards and all applicable legal requirements. Descriptions of the NESC standards, PPL Electric's design criteria, and PPL Electric's safety practices are provided in **Attachment 4 – Design and Safety Criteria** to this Letter of Notification.

41. **Attachment 4** accompanying this Letter of Notification also explains PPL Electric's standards for Magnetic Field Management.

42. PPL Electric's Magnetic Field Management Program is applied to new and reconstructed transmission line projects. Although there is no current scientific evidence demonstrating that magnetic fields cause any adverse health effects or pose a health or safety threat to the public, PPL Electric has established a policy to design its new and rebuilt transmission lines to reduce magnetic fields.

43. To lower magnetic field exposures, the program generally prescribes the use of a line design that provides ground clearances higher than the required minimum NESC ground clearance and reverse phasing of new double-circuit lines where it is feasible to do so at low or no cost. The implementation of additional modifications to reduce magnetic field levels is considered, provided those modifications can be made at low or no cost and will not interfere with the operation of the line.

44. The program will be applied to this Project and the Project is designed with clearances that are at least 3 feet higher than NESC standards.

IV. DESCRIPTION OF THE RIGHT-OF-WAY

45. The Project is located on property owned by PPL Electric or by the Customer.[7] The Project will support the Customer's facilities by connecting it to the Tomhicken 230 kV Switchyard and, ultimately, the existing electric grid.

46. The entire Project is within Hazle Township, Luzerne County, Pennsylvania. PPL Electric has provided information about the proposed Project to representatives of Hazle Township and Luzerne County.

47. The proposed Tomhicken 230 kV Switchyard and Customer-owned substation will be co-located approximately 1.8 miles southwest of State Route 93 (SR 93) and the Interstate 81 (I-81) interchange, outside the incorporated borough of West Hazleton.

48. As explained in **Attachment 1 – Necessity Statement**, PPL Electric plans to construct the new Tomhicken 230 kV Switchyard and 230 kV Tap and Connecting Lines to interconnect the Customer's 230 kV substation with the Transmission Grid. The 230 kV Tap Lines will be located partially within existing PPL fee-owned property and within approximately 11 acres of 150-foot-wide ROW located on the Customer's property, which the Customer will be required to and has agreed to grant to PPL Electric. The Project requires the installation of 13 new structures, which will be constructed on properties owned by PPL Electric or by the Customer.

V. LAND USE AND ENVIRONMENTAL EVALUATION

49. A network of existing and new access roads will be utilized during construction of the transmission lines, switchyard, and substation. New access roads will be constructed and located within the 150-foot-wide ROW acquired from the Customer. A detailed map of the

[7] An approximately 60 acre tract of the customer property will be acquired by PPL Electric for the new Tomhicken Switchyard. The proposed PPL Electric parcel is identified on Figure 3-1.

Tomhicken 230 kV Switchyard, 230 kV Tap and Connecting Lines, Customer-owned substation, and 230 kV transmission lines to be removed is provided in **Figure 3-1** in **Attachment 3 – Description of Project Area.**

50. As explained above in **Attachment 3 – Description of Project Area**, construction of the proposed Project will take place entirely within existing or soon-to-be acquired ROW. Therefore, it is anticipated that the Project will have minimal incremental impacts on land use in the area.

51. The Project Area is generally bounded to the north by Black Creek and Grassy Path Road; to the east by undeveloped forested land owned by the customer; to the south by commercial/industrial warehouses associated with Humboldt Industrial Park and Stony Creek; and to the west by residential properties within the community of Eagle Rock Resort. Land uses immediately surrounding the Project Area predominantly consist of vacant forested land or developed residential land.

52. The closest communications tower is located approximately 1.7 miles northeast of the Project. A natural gas pipeline operated by UGI Utilities, Inc. travels northwest to southeast and is crossed by the Project. An abandoned railroad (Lehigh Valley Railroad) owned by Norfolk Southern traverses 0.4 miles north of the Project, generally in an east-west direction.

53. Additionally, an existing PPL Electric distribution line crosses the Project in a general north/northwest to south/southeast direction between proposed Structures S5 and S6, as well as proposed Structures S2 and S3. The PPL Electric distribution line will be relocated within the Customer's property as part of the Project, because its current location is in conflict with the planned location of the Customer-owned substation.

54. The closest active airport relative to the Project Area is the Hazleton Regional Airport, a publicly owned facility, located approximately 3.8 miles northeast of the Project. Additionally, one private heliport, the Lehigh Valley Hospital Heliport, is located approximately 5 miles southeast of the Project.

55. PPL Electric does not anticipate any interference with airport or heliport operations since the Project consists of new electrical facilities that are of a similar height as the existing electrical facilities in the immediate Project Area. However, PPL Electric will file any required documentation with the Federal Aviation Administration.

56. The proposed Project will not affect any national parks, state parks, local parks, recreational areas, or natural landmarks, or other conserved lands as none are located within the Project Area.

57. An online review of the Project Area and surrounding landscape was conducted through the Pennsylvania Historical and Museum Commission ("PHMC") State Historic and Archaeological Resource Exchange site. State Historic Preservation Office ("SHPO") eligible and listed structures and districts within 1 mile of the Project Area are limited to only one eligible district resource: The Lehigh Valley Railroad. The abandoned railroad is located approximately 0.3 miles north of the Project Area, traversing in a general east-west direction, and is not crossed or spanned by the Project. The Project will not affect the abandoned railroad.

58. PPL Electric has coordinated with the PHMC for the modifications being made to the transmission lines. This coordination is required to receive permits to construct the Project.. PPL Electric does not anticipate any impacts to SHPO-listed or -eligible structures or districts. Furthermore, based on the referenced coordination with PHMC and as per a PHMC letter dated

April 17, 2025, no archaeological or historic architectural resources will be affected by the proposed project.

59. No unique geological, scenic, or natural areas are crossed by the Project, according to the Pennsylvania Department of Conservation and Natural Resources ("DCNR").

60. A Natural Area Inventory ("NAI") has been prepared by The Nature Conservancy in collaboration with the Pennsylvania Natural Heritage Program ("PNHP") for Luzerne County (2006). The Humboldt Barren NAI area is an exceptional-rated natural heritage area located approximately 1,000 feet south/southeast of the Project. This area is characterized as "a dwarf tree forest natural community on a broad high-elevation ridgetop." The Project does not cross the natural areas with supporting habitat identified within the NAI. Additionally, the majority of the NAI contains developed land associated with the Humboldt Industrial Park.

61. No other NAI areas or other unique natural features are located within 1 mile of the Project.

62. The Project Area is located on gradually undulating land, primarily surrounded by undeveloped forest. Topography within the Project Area ranges between approximately 1,300 feet and approximately 1,700 feet above mean sea level ("msl"). Soils present within the Project Area predominantly consist of silty and sandy loams, ranging between 3 and 25 percent slopes.

63. Erosion and Sedimentation ("E&S") control plans will be developed and implemented for the Project to minimize the displacement of soils. These plans will require prior approval from the Luzerne County Conservation District. Coverage under the National Pollutant Discharge Elimination System ("NPDES") permit (PAG-02, Discharges of Stormwater Associated with Construction Activities) will also be required from the Pennsylvania Department of Environmental Protection ("PADEP") as needed. During construction, PPL Electric will adhere to

all conditions specified in the NPDES permit. Impacts to local soil resources are anticipated to be minimal.

64. The prospective Customer retained an environmental consultant to identify and delineate all waterways and wetlands on its entire property subject to the Project. The Customer's consultant identified 13 wetlands, six waterbodies, three unnamed tributaries ("UNTs") flowing north to Black Creek, and two UNTs flowing northeast to Stony Creek.

65. Of these features, one freshwater emergent ("PEM") wetland and one UNT to Black Creek are crossed by the project. The wetland and stream are not anticipated to be impacted during construction. These delineated features are located on the portion of the Customer's property which the Customer has agreed to grant to PPL Electric, generally between proposed Structures N2 and N3. No other delineated features on the Customer's property are crossed by the Project, as these features are generally concentrated in the vicinities of Black Creek to the north and Stony Creek to the south.

66. PPL Electric conducted a wetland delineation on the portion of its property containing the existing Susquehanna-Harwood 230 kV Transmission Line and identified three wetlands and four tributaries to Stony Creek. Minimal impacts to wetlands are anticipated for the Project. PPL Electric will avoid impacts to wetlands and streams where possible by aerially spanning these features.

67. PPL Electric will obtain all necessary permits from PADEP and the United States Army Corps of Engineers ("USACE") and will comply with all the terms and conditions placed on those permits. PPL Electric also will consult with the Luzerne County Conservation District, prepare any required soil erosion and sedimentation control plans, and obtain NPDES permits and comply with any conditions placed on those permits.

68. The National Flood Hazard Layer for Luzerne County, Pennsylvania was obtained through the Federal Emergency Management Agency ("FEMA") Flood Map Service Center website and analyzed for 100-year floodplains and regulatory floodway within the Project Area and surrounding landscape. Based on review of this data, the Project crosses no FEMA 100-year floodplain nor FEMA regulatory floodway. Black Creek to the north and Stony Creek to the south of the Project Area are both within FEMA Zone A, a 100-year floodplain, and has a 1-percent-annual-chance of inundation due to a flood event.

69. No impacts to the floodplain area of either Black Creek or Stony Creek are anticipated by the proposed Project activities, since the proposed switchyard, substation, and 230 kV structures will be constructed outside of the 100-year floodplains. PPL Electric will coordinate with local agencies for regulated floodplain activities where required.

70. The Project will be located entirely within property owned by either PPL Electric or the Customer. The existing Susquehanna-Harwood 230kV Transmission Line ROW has been largely cleared of vegetation as part of PPL Electric's standard vegetation management practices.

71. The site for the new PPL Electric switchyard and the Customer-owned substation is located in an undeveloped wooded area and vegetation clearing is anticipated to accommodate the construction of the new Tomhicken Switchyard and Customer-owned substation. In fall 2024, the Customer began vegetation removal in anticipation of the future development.

72. On March 1, 2024, the customer's consultant ran a Pennsylvania Natural Diversity Inventory ("PNDI") to assess the potential presence of threatened and endangered species and/or special concern species on the customer's property. Specific agencies reviewing the Project included the Pennsylvania Game Commission ("PGC"), Pennsylvania Fish & Boat Commission

("PFBC"), PA Department of Conservation and Natural Resources ("DCNR"), and U.S. Fish and Wildlife Service ("USFWS").

73. On November 27, 2024, PPL Electric ran a PNDI for their property crossed by the existing Susquehanna-Harwood 230kV Transmission Line. Both the PGC and PFBC indicated no further consultation is required for the Project. The DCNR search indicated that the Project is located within the range of the *Bartonia paniculata ssp. paniculata*, a special concern species of screw-stem found in sandy or peaty acidic wetlands. According to the Luzerne County NAI, screw-stem is present within the county. PPL Electric will coordinate with DCNR to use avoidance measures or replanting if the botanical area is impacted.

74. The DCNR search indicated that the Project is located in range of a special concerns species. Based on this review, the DCNR determined potential impacts to the following threatened or endangered plant species or plant species of special concern:

- Variable Sedge
- Fall Dropseed Muhly
- Yellow-fringed Orchid
- Lupine
- Screw-stem
- Hartford Fern
- Rough-leaved Aster
- White-fringed Orchid
- Herbaceous Vernal Pond
- Hemlock-Mixed Hardwood Palustrine Forest
- Pitch Pine – Rhodora – Scrub Oak Woodland

75. The DCNR requested that a botanical survey be completed for the above listed species by a qualified botanist at the appropriate time of year, and the agency recommended that a Wild Plant Management Permit be obtained before botanical surveys occur.

76. A field survey for Screw-Stem was conducted on August 7 and 8, 2025, per the request of DCNR and the results/observations were submitted to DCNR via a Field Survey Summary Report.

77. DCNR issued a Clearance Letter, dated September 29, 2025, stating, in summary, *with compliance to the stated minimization and conservation measures, DCNR has determined that no impact is likely and no further coordination with the agency is needed for the project.*

78. The PGC advised a conservation measure and deferred comments to the USFWS, and the PFBC reported no known impacts to threatened and endangered species and/or special concern species and resources within the Project Area. Therefore, no further consultation with PGC or PFBC is required for this Project.

79. The USFWS search indicated that the Project is located in range of a special concern species or resource and a sensitive species. Given the Project Area contains suitable bat habitat, including rock outcrops, caves, forest canopy, wetlands, and streams, the Customer completed bat habitat surveys on a portion of PPL Electric's property and the entire customer property from June through October of 2024. All necessary studies have been completed, and PPL Electric will comply with all permit conditions.

80. Overall, nine rock outcrops located on the property were identified as potential bat hibernacula. Four of these areas were located in the northwest portion of the Customer's property, four were identified in the southern portion of the property, and one was observed in the northeast portion of the property. Ultimately, the consultant who performed the investigation determined

that tree clearing associated with the Project (conducted between October 1st and March 31st) would not impact potential summer roosting sites or winter hibernacula, given that the identified areas are located outside of the proposed limits of disturbance. The customer commenced tree clearing activities for the Project in fall 2024.

81. PPL Electric will continue to consult with the jurisdictional agencies regarding potential impacts to protected species, complete all required surveys; obtain all necessary approvals and permits for Project construction; and comply with all conditions placed on those permits.

82. If vegetation management is required within the existing ROWs, PPL Electric will apply its "Specifications for Transmission Vegetation Management LA-79827" to minimize potential impacts.

VI. NOTICE

83. PPL Electric has reached out to residents located immediately adjacent to PPL Electric's and the prospective customer's fee owned parcels. Copies of the Letter of Notification will be served upon landowners in accordance with 52 Pa. Code § 57.72(d)(3). A list of the landowners impacted by this project is provided in **Attachment 5 – Landowner and Agency List.**

84. PPL Electric has provided information regarding the Project to representatives of Hazle Township in Luzerne County, Pennsylvania. Hazle Township has not objected to the proposed Project. Copies of this Letter of Notification will be served on the governmental agencies, municipalities, and other public entities and organizations in accordance with 52 Pa. Code § 57.72(d)(3). A list of these entities and organizations is also provided in **Attachment 5**.

VII. LETTER OF NOTIFICATION

85. PPL Electric is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission's regulations at 52 Pa. Code § 57.72(d)(1)(iii) and (vi).

86. The proposed Project qualifies for use of a Letter of Notification because it will be located entirely within the applicant's existing transmission line ROW and the property of the customer to be served by the line, and because it has a proposed route of 2 miles or less.

87. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the proposed Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq*.

VIII. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the proposed Project located in Luzerne County, Pennsylvania, that is explained above and in the Attachments hereto, by no later than March 26, 2026.

Respectfully submitted,



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Date: December 19, 2025 Attorneys for PPL Electric Utilities Corporation

PPL ELECTRIC
ATTACHMENT 1

TOMHICKEN 230 KV SWITCHYARD PROJECT

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Figure 1-2: Proposed System Configuration

1.0 INTRODUCTION

PPL Electric Utilities Corporation ("PPL Electric") is requesting Pennsylvania Public Utility Commission ("PUC" or "Commission") approval to build approximately 1.1 miles of new double-circuit 230 kilovolt ("kV") transmission taps ("Susquehanna-Tomhicken #1 & #2 230 kV and Tomhicken-Harwood #1 & #2 230 kV lines" or "Tap Lines") that are needed to connect the existing Susquehanna-Harwood #1 & #2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard (the "Project"). 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 Switchyard are located in Hazle Township, Luzerne County, Pennsylvania. PPL Electric has designed the proposed transmission line system so that it fits entirely within property owned by the customer (the "Customer") or by PPL Electric. PPL Electric is working with the Customer to finalize necessary easements.

The Project is needed to accommodate multiple customer requests[1] to serve new and future load in the area. The scope of work required to serve this load is comprised of two phases. Only the first phase of the Project is the subject of this Letter of Notification. Any additional high-voltage ("HV") transmission line work associated with the second phase of work will be the subject of a future letter of notification or siting application, as may be necessary and appropriate under the Commission's regulations.

As explained in greater detail below, the first phase of the Project ("Phase 1") involves the construction of new HV transmission lines. Phase 1, subject to this Letter of Notification, is needed to connect the Customer requesting transmission level service in Hazle Township, Luzerne County, Pennsylvania to the 230 kV system. PPL Electric's system planners determined that splitting the adjacent Susquehanna-Harwood #1 & #2 230 kV Transmission Lines, creating the Susquehanna-Tomhicken #1 & #2 230 kV

[1] While the instant LON is needed forthwith to connect the Customer to the 230kV grid through the Customer-owned substation and the Tomhicken Switchyard, PPL Electric did receive more than one customer request for transmission level service. As such, PPL Electric anticipates that the Tomhicken Switchyard will eventually interconnect a second, customer-owned substation. However, any future project or constructions needed to interconnect the other requesting customer will be undertaken as the subject of a future, standalone filing before the Commission.

and Tomhicken-Harwood #1 & #2 230 kV lines, and providing 230 kV service from the new Tomhicken 230kV Switchyard is the optimal solution to serve the Customer's initial requested load.

PPL Electric anticipates that a second phase of transmission expansion ("Phase 2") will be needed to address the future electrical needs and demands associated with this Customer and with other load requests, as well as PPL Electric's own system needs. At a future date, Phase 2 will be submitted in an appropriate filing before the PUC. PPL Electric notes that the phases are being submitted separately because only the first phase is required to meet the Customer's in-service request; Phase 2 will not be necessary until the Customer's load increases at a future date. Additionally, the Company anticipates that Phase 2 will require a full siting application.

As such, PPL Electric herein seeks Commission approval to split the Susquehanna-Harwood #1 & #2 230 kV Transmission Lines and extending the Tap Lines to the new Tomhicken 230 kV Switchyard, as well as providing new Connecting Lines from the Tomhicken Switchyard to the Customer-owned 230-34 kV substation.

The Project is required to comply with:

- The PPL Electric Utilities Corporation General Tariff to provide non-discriminatory service to a customer facility at 69,000 kV or above service at the LP-5 rate schedule.
- PPL Electric's general right and obligation to serve customers in its service territory, subject to the terms and conditions of its tariffs and their certificate of public convenience[2].

The Project as proposed represents the optimal solution that allows PPL Electric to serve the Customer's load. Importantly, the new load that will result from interconnecting this Customer with the transmission grid as proposed by this Project will also positively impact transmission rates paid by PPL Electric customers, and provide PPL Electric an opportunity to enhance the existing transmission system.

[2] *See, e.g.*, 66 Pa.C.S. §§ 1103, 1501, 2802(12); 52 Pa. Code §§ 57.19; *Popowsky v. Pa. PUC*, 910 A.2d 38, 48-56 (Pa. 2006); *Pa. Gas Co. v. Pub. Serv. Comm'n*, 83 Pa. Super. 557, 565-66 (1924); *Philadelphia Transp. Co. v. Pa. PUC*, 37 A.2d 138, 147 (Pa. Super. 1944); *Application of Leatherstocking Gas Co., LLC, for Approval to Supply Natural Gas Serv. to the Pub. in N. Susquehanna Cnty., in the Twps. of Bridgewater, Forest Lake, Great Bend, Harmony, New Milford, and Oakland, and in the Boroughs of Great Bend, Hallstead, Lanesboro, Montrose, New Milford, Oakland and Susquehanna*, Docket No. A-2011-2275595, 2012 Pa. PUC LEXIS 1391, at *22 (Order entered Aug. 30, 2012).

Subject to the Commission's approval, construction will begin on March 30, 2026, to support an in-service date of December 15, 2026. PPL Electric will own, operate, and maintain the proposed Tomhicken Switchyard, Tap Lines and Connecting lines. The Customer will construct, own, operate, and maintain their 230 -34 kV substation. The total estimated cost of this Project, as described below, is approximately $59.9 million. The Customer is responsible for approximately $21.5 million, and PPL Electric is responsible for approximately $38.4 million. These costs do not include the Customer costs for their own dedicated substation and their site improvements to support our new proposed infrastructure on their site.

2.0 BACKGROUND

PPL Electric has a right and obligation to provide retail electric service in a manner that is adequate, efficient, safe, reliable, and reasonable to meet the needs of the electric system and the expectations of its customers.

PPL Electric is a public utility that provides electric service to approximately 1.5 million customers throughout 29 central and eastern Pennsylvania counties. The Susquehanna-Harwood #1 & #2 230 kV lines are part of PPL Electric's 230 kV Bulk Electric network. These transmission lines transfer power south from the Susquehanna Nuclear Station to the Harwood Substation (Luzerne County), East Palmerton Substation (Carbon County) and Siegfried Substation (Northampton County).

3.0 TRANSMISSION SYSTEM PLANNING PROCESS

The nation's interconnected transmission grid ("Transmission Grid") serves as the backbone for the safe and reliable delivery of large amounts of electricity from generating stations over substantial distances to customers served by transmission and local distribution systems. It is critical that the Transmission Grid be planned and designed to ensure reliable electric service is provided under all loading conditions or when certain elements of the Transmission Grid are out of service (system contingencies) due to planned or unplanned outages.

Robust Transmission Planning assures that the transmission system can supply electricity to all customer loads in a manner that is reliable and economical. This System Planning process ensures that both the Bulk Electric System ("BES")[3] and non-Bulk Electric System (non-BES)[4] are planned and constructed so that:

- They can accommodate forecasted system flows during summer and winter peak load;
- They can adequately serve each customer's need regarding capacity, voltage, and reliability for all load levels throughout the daily load cycle;
- They can sustain contingencies and disturbances with minimal customer service interruptions; and
- They are in conformance with North American Electric Reliability Corporation ("NERC"), PJM Interconnection, LLC ("PJM"), and the Transmission Owner's reliability criteria for all normal and emergency operating conditions.

PJM is a Federal Energy Regulatory Commission ("FERC")-approved Regional Transmission Organization ("RTO") charged with ensuring the reliability of the electric transmission system under its functional control (100kV and above) and coordinating the movement of electricity in all or parts of thirteen states and the District of Columbia, including Pennsylvania.[5]

New load customers are covered under Attachment M-3 Procedure of the Open Access Transmission Tariff ("OATT").[6] PPL Electric submits to PJM and presents the supplemental project assumptions and methodology yearly at the PJM Subregional Regional Transmission Expansion Planning ("RTEP") December meeting.[7] The supplemental project driver of "Customer Service" is used for new customer requests. PPL Electric submits the project need information to PJM detailing the requested load amount,

[3] Includes transmission facilities operated at voltages of 100 kV or higher.

[4] Includes transmission facilities operated at voltages less than 100 kV.

[5] As more fully explained in the Letter of Notification, PPL Electric notes that this Letter of Notification, if approved, would resolve the issues involved in the proceeding pending before FERC at FERC Docket No. ER ER24-2172.

[6] PJM OPEN ACCESS TRANSMISSION TARIFF: https://www.pjm.com/directory/merged-tariffs/oatt.pdf

[7] PPL 2024 Annual M-3 Project Assumptions and Methodology: https://www.pjm.com/-/media/committeesgroups/committees/srrtep-ma/2023/20231213/20231213-item-05---2024-ppl-planning-assumptions.ashx

location, and requested in-service date. PPL Electric then presents the need at the next TEAC (>200 kV) or Subregional-RTEP (<200 kV) meeting. At a subsequent meeting, PPL Electric presents the proposed solution to serve the requested load. PPL Electric provides the solution files to PJM including changes to the network model, contingency changes, and short-circuit model changes. PJM then studies the proposed solution to ensure that the changes do no harm (DNH test) to the system by creating overloads, voltage violations, or other criteria violations. PPL Electric will include in the solution any upgrades that are required to serve the customer load in the DNH case year. When the project passes the DNH test a supplemental project number is assigned and PPL Electric submits the project into the local plan. The project then is added into the RTEP model in the next case creation cycle. Any customer load increases above the DNH harm case year will be included in the PPL Electric's Load Forecast submission to PJM. The load increases are then incorporated into the RTEP case creation. Any overloads, voltage violations, or other criteria violations caused by the increase of load on PPL Electric's system are then resolved through the PJM Competitive Planning Process.

This Project has gone through the M-3 Supplemental Project Process and the DNH tests. The Project was assigned supplemental number 3528.

4.0 THE NEED FOR THE PROJECT

4.1 Existing System

The Susquehanna-Harwood #1 & #2 230 kV lines are part of PPL Electric's 230 kV Bulk Electric network. These transmission lines transfer power south from the Susquehanna 230 kV Switchyard (near the Susquehanna Nuclear Station) to the Harwood 230-69 kV Substation (Luzerne County), East Palmerton 230-69 kV Substation (Carbon County), and Siegfried 230-138-69 kV Substation (Northampton County). The Susquehanna Switchyard and Siegfried Substation are connected to multiple other 230 kV lines. The 230 kV network moves power from the generators to regional supply substations. At the regional substations, the 230 kV is stepped down to 69 kV and/or 138 kV. The distribution substations in the surrounding area are supplied via transmission lines operating at 69 kV or 138 kV.

A map of the existing system configuration is provided as **Figure 1-1**.

4.2 Project Need

While PPL Electric expects load growth from multiple customers in the area of the Project, the first new Customer, located in Hazle Township, is requesting electrical service with an in-service date of December 15, 2026, and an initial load of 12 megawatts ("MW"). While the Project proposed is this Letter of Notification is needed to serve the initial load of the Customer, PPL Electric anticipates that the initial Customer's load will increase in stages to approximately 965 MW by 2031. Due to the size of the requested load, the Customer is most appropriately supplied from the 230 kV network. Moreover, as the Customer's load continues to ramp up, it is anticipated that additional improvements to the 230 kV network in this area will be required at a later date, i.e., under the Phase 2 of work that will be the subject of a future filing, to continue to provide reliable service to the area.

The Project is principally required to comply with PPL Electric's obligation to provide service to customers upon a request for the same, subject to reasonable terms and conditions. In this case, PPL Electric specifically notes that, consistent with its Tariff, PPL Electric and the Customer have voluntarily negotiated a service agreement which contemplates the provision of the requested service to the Customer, but which also contains financial safeguards to ensure that PPL Electric's customers are insulated from the costs of the Project. In addition, PPL Electric anticipates that new, incremental load upon the transmission system will have a positive impact upon the transmission rates paid by its customers.

In addition to these direct protections and benefits, the expedient initiation of adequate and reliable service to new high-load customers seeking to enter PPL Electric's system is critical for the Commonwealth of Pennsylvania's continued economic development. Such new, incremental high-load customers can result in additional job growth and tax base for the Commonwealth.

Moreover, the connection of high-load customers to PPL Electric's BES will ultimately reduce the transmission rates charged by PPL Electric to its other customers.

5.0 ALTERNATIVES

PPL Electric performed a comprehensive analysis to identify feasible and cost-effective solutions to best serve the prospective Customer, consistent with its obligations to provide non-discriminatory service to a customer above 69 kV, while seeking to minimize impacts upon the local environment and surrounding community.

PPL Electric evaluated the following alternatives to serve the Customer at 230 kV, focused initially on serving the Customer's initial load and also allowing for Phase 2 work to be completed at a later date to accommodate increased load:

1) Expand the Harwood 230 kV Substation by installing three new 230 kV bays. This alternative would require relocation of the existing 230 kV capacitor to accommodate the new 230 kV bays and installation of seven new 230 kV breakers, as well as re-termination of the existing Susquehanna #1 & #2 lines into the new bay positions. In addition to the substation expansion, two new double-circuit 230 kV transmission lines (four circuits total) would need to be installed over approximately 3 miles within new greenfield right-of-way ("ROW") and connect to the Customer's 230-34 kV substation. This solution was not selected due to the significant environmental, community, and landowner impact anticipated by the installation of approximately 3 miles of new 230 kV transmission lines, which were not present under the other alternative evaluated. In addition, the ultimate demand of the customers served by this Project is anticipated to be approximately 2000 Megawatts. This factor, combined with the need anticipated as part of the scope of Phase 2, would build out all but one line position at Harwood substation. This would limit the ability of PPL Electric to accommodate other requests and load growth in the Hazleton area.
2) Split and extend the existing Susquehanna-Harwood #1 & #2 230 kV Transmission Lines to terminate into a new 230 kV switchyard. In addition, extend two double-circuit 230 kV transmission lines from the new 230 kV switchyard to the new Customer-owned 230-34 kV substation ("Proposed Solution").

6.0 PROPOSED SOLUTION

To appropriately serve the Customer's initial load and limit impacts to the local community, PPL Electric proposes to build a new breaker-and-a-half 230 kV switchyard and extend four 230 kV lines to the Customer's substation, all located within the Customer-owned parcel. The new breaker-and-a-half switchyard is required due to the number of lines needed by the Customer and the size of the requested load.

The new Tomhicken 230 kV Switchyard will be constructed in a breaker-and-a-half arrangement. Section III of the PJM minimum planning and design standards refers to Substation Bus Configurations and Substation Design Recommendations.[8] Under PJM's standards, three terminal lines and radial bus station configurations are discouraged for use in new BES substation construction because of the considerable potential for detrimental effects on transmission system reliability. Acceptable standards for substations are noted as ring bus configurations, breaker-and-a-half-arrangements, and double breaker–double bus arrangements. Breaker-and-a-half arrangements are the preferred design because of the balance of operational flexibility and cost that this design affords.

The proposed Tomhicken 230 kV Switchyard will be constructed on the same Customer-owned parcel as the Customer's 230-34 kV substation and facilities. PPL Electric will acquire the necessary land and ROW from the Customer for the new Tomhicken 230 kV Switchyard, Tap Lines and Connecting Lines. Building the new switchyard on the Customer-owned parcel is optimal since PPL Electric has existing 230 kV transmission lines traversing the property. The Proposed Solution will allow PPL Electric to split the transmission lines on the Customer-owned parcel and extend them to the new switchyard. This will significantly reduce impacts to adjacent landowners and the surrounding environment, as compared to the other alternative, by limiting the amount of new transmission line construction necessary to connect the new Tomhicken 230 kV Switchyard to the electric grid. The Tomhicken 230 kV Switchyard will be located adjacent to the Customer-owned 230-34 kV substation, further limiting the amount of impact and new transmission facilities required. The proposed Tomhicken 230 kV Switchyard will also provide

[8] PJM Substation Bus Configurations and Substation Design: https://www.pjm.com/~/media/planning/design-engineering/maac-standards/section-iii-sub-bus-config.ashx

additional operational flexibility to serve customer load and meet future system needs. The Tomhicken 230 kV Switchyard will add the ability to connect additional 230 kV circuits to support the 230 kV system to address load growth in the Hazleton area.

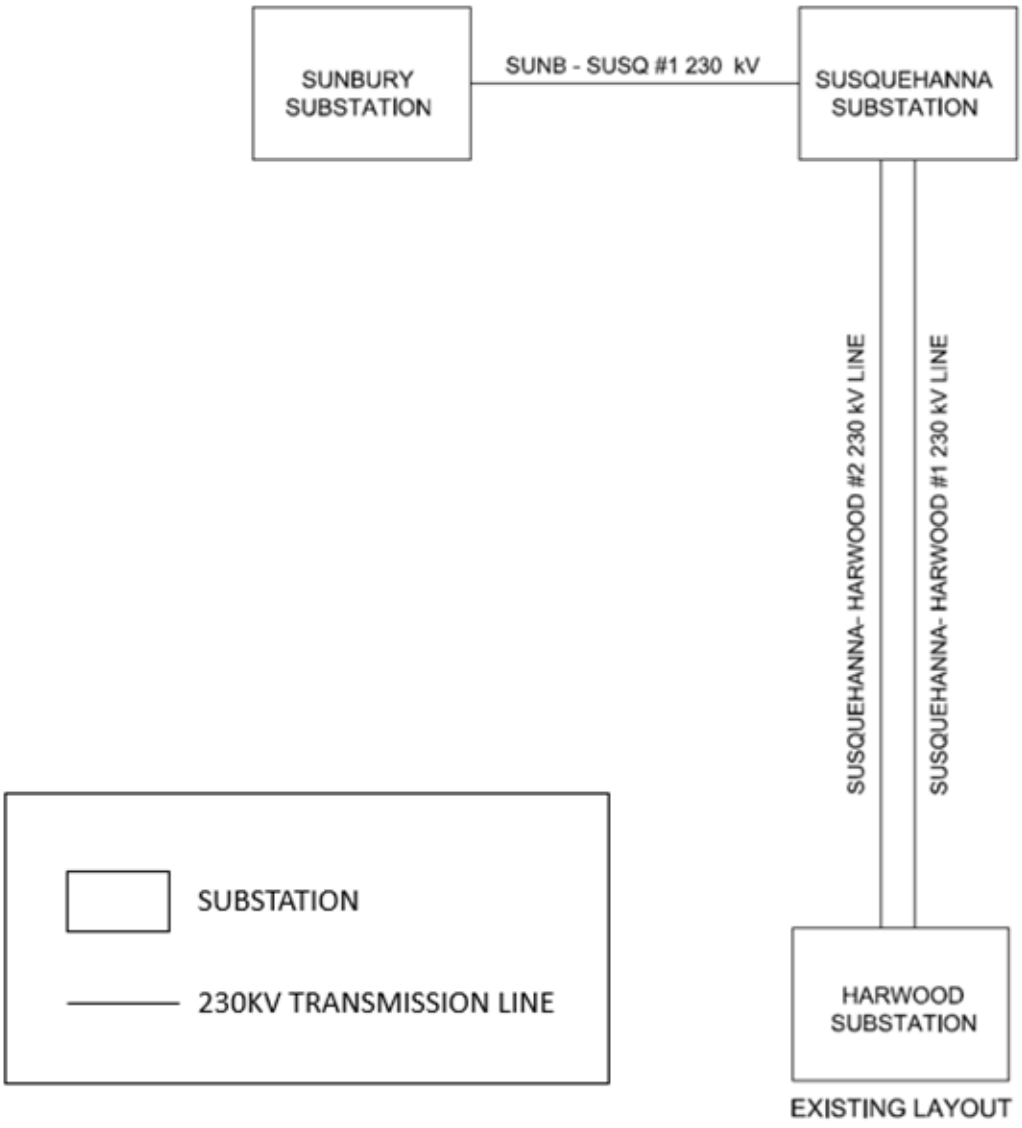
The Project will require the construction of approximately 1.1 miles of new 230 kV transmission lines to connect the existing Susquehanna-Harwood #1 & #2 230 kV lines into the new Tomhicken 230 kV Switchyard. The Project will also extend two 230 kV transmission lines for approximately 0.1 miles from the new Tomhicken 230 kV Switchyard to the new Customer-owned 230-34 kV substation. This Project is part of PJM Supplemental Number S3528, specifically segments S3528.1, S3528.6, and S3528.11.

Phase 2 of the supplemental project will be submitted at a later date in a separate PUC filing, in order to accommodate additional anticipated load from new customers. PPL Electric provides this additional detail at this time for informational purposes only. Phase 2, as accepted by PJM, includes additional reinforcements of the 230 kV system from the Susquehanna 230 kV Switchyard to the Tomhicken 230 kV Switchyard and Harwood 230-69 kV Substation, via a new 230 kV switchyard ("Nescopeck 230 kV Switchyard"). The existing Sunbury-Susquehanna 230 kV line will be split into the new Nescopeck 230 kV Switchyard. The section of the Sunbury-Susquehanna #1 230 kV line between the Nescopeck 230 kV Switchyard and the Susquehanna 230 kV Switchyard will be rebuilt to double-circuit 230 kV operation. Two new 230 kV lines will be extended south from the Nescopeck 230 kV Switchyard, with one line terminating at the Tomhicken 230 kV Switchyard and one line terminating at the Harwood 230-69 kV Substation. The additional paths from the Susquehanna 230 kV Switchyard to the Tomhicken 230 kV Switchyard and Harwood 230-69 kV Substation will prevent the thermal overload of the Susquehanna-Tomhicken #1 & #2 230 kV and Tomhicken-Harwood #1 & #2 230 kV lines. These upgrades will also increase operational flexibility and resiliency of the 230 kV system. These upgrades will allow for load growth of the Customer as well as other customers in the Hazleton area. Phase 2 is part of PJM Supplemental Number S3528, specifically segments S3528.2, S3528.3, S3528.5, S3528.7, S3528.8, and S3528.10

The proposed solution will allow PPL Electric to provide safe and reliable transmission level service to the Customer while maintaining reliability of the BES. Additionally, this solution is the least impactful

option to landowners and the local community among the feasible alternatives. A map of the proposed system alignment is provided as **Figure 1-2**.

Figure 1-1: Existing System Configuration





Existing 230 kV Structure
Existing 230 kV Transmission Line
Existing PPL ROW
Existing Distribution Line
Approximate Pipeline
Parcel Boundary
Existing PPL-Owned Parcel

Roads, Railroads, Municipalities (PASDA 2022)
Parcels (Luzerne Co. 2024)
Rivers (USGS 2022)

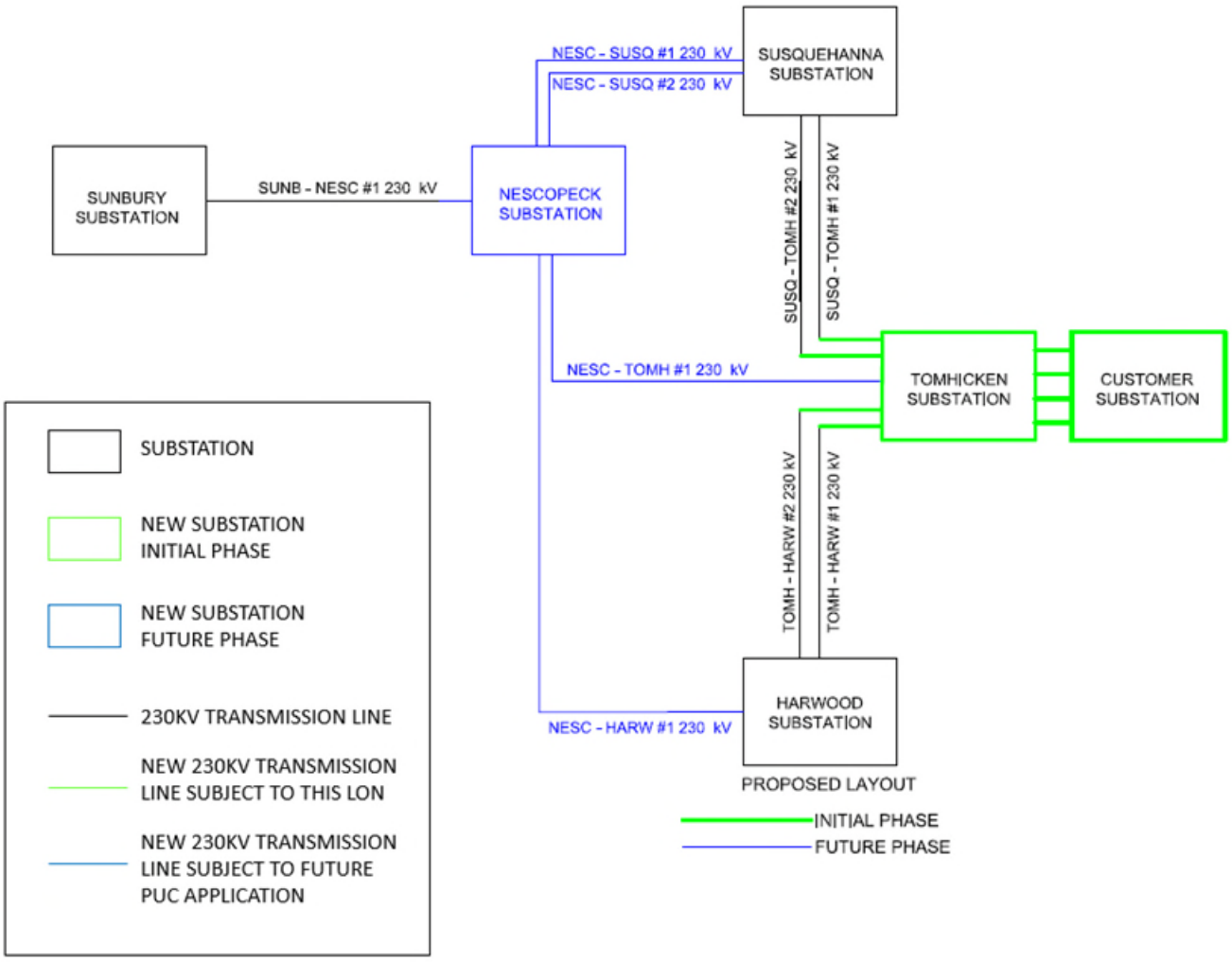
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Datum: North American 1983

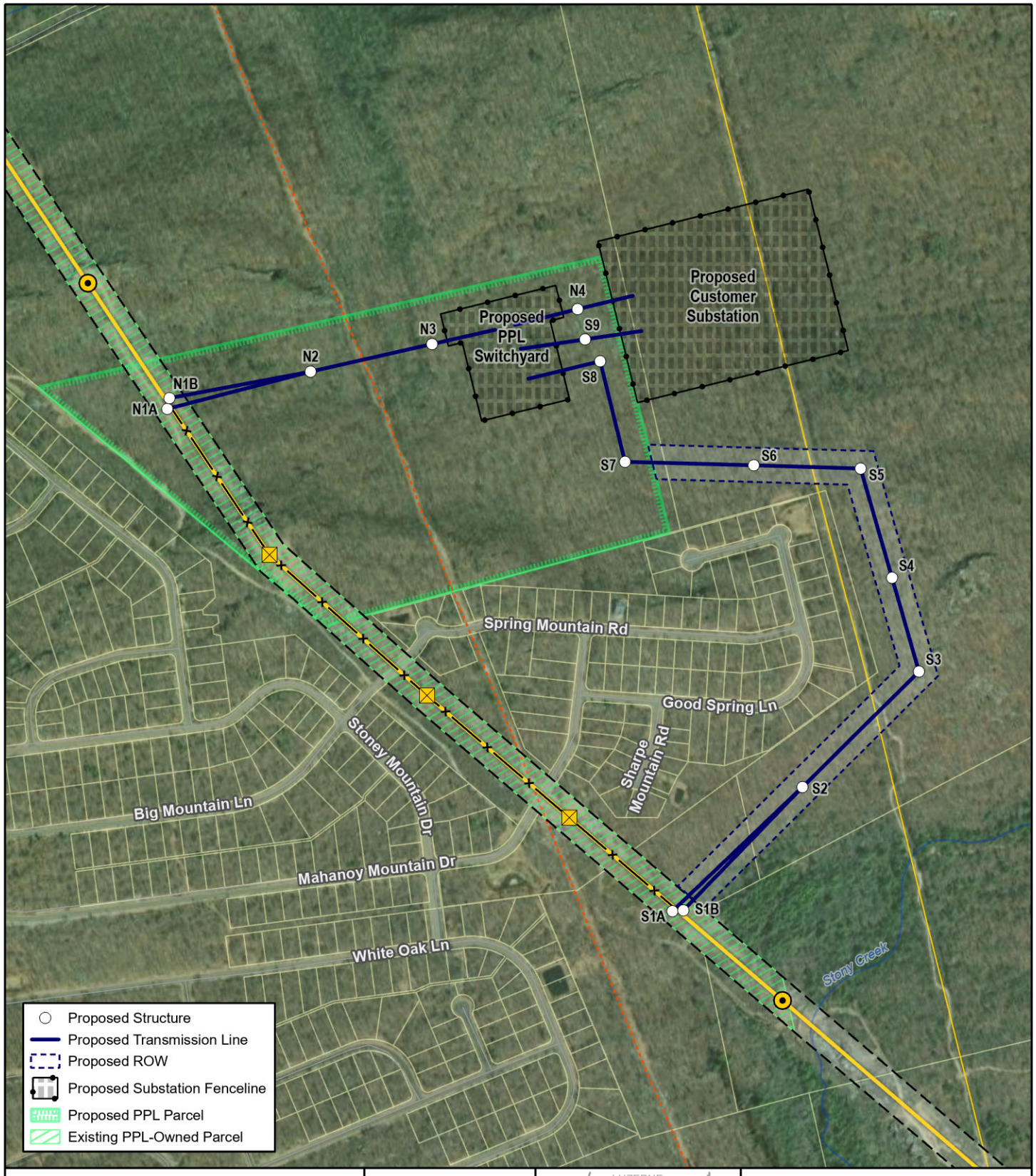


Figure 1-1
Existing System Configuration
Tomhicken 230 kV
Transmission Line Project

0 300 600 Feet

Figure 1-2: Proposed System Configuration





Existing Structure to Remain
Existing Structure to be Removed
Existing Transmission Line to be Removed
Existing 230 kV Transmission Line
Approximate Pipeline
Existing Distribution Line
Existing PPL ROW
Parcel Boundary

Roads, Railroads, Municipalities (PASDA 2022)
Parcels (Luzerne Co. 2024)
Rivers (USGS 2022)

Coordinate System:
State Plane Pennsylvania North
Datum: North American 1983



Figure 1-2
Proposed System Configuration
Tomhicken 230 kV
Transmission Line Project

0 300 600 Feet

PPL ELECTRIC
ATTACHMENT 2

TOMHICKEN 230KV SWITCHYARD PROJECT

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1.0 INTRODUCTION

As explained in **Attachment 1 – Necessity Statement** to this Letter of Notification ("LON"), and in the LON and other associated attachments, PPL Electric Utilities Corporation ("PPL Electric") is requesting Pennsylvania Public Utility Commission ("PUC" or "Commission") approval to build approximately 1.1 miles of new double-circuit 230 kilovolt ("kV") transmission taps ("Susquehanna-Tomhicken #1 & #2 230 kV and Tomhicken-Harwood #1 & #2 230 kV lines" or "Tap Lines") that are needed to connect the existing Susquehanna-Harwood #1 & #2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard (the "Project"). The Project also includes constructing 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 Switchyard are located in Hazle Township, Luzerne County, Pennsylvania. PPL Electric has designed the proposed transmission line system so that it fits entirely within existing PPL Electric right-of-way ("ROW") and the customer's (the "Customer") property. PPL Electric is working with the Customer to finalize necessary easements.

As explained in greater detail in **Attachment 1 – Necessity Statement**, the Project is needed to accommodate multiple customer requests[1] to serve new and future load in the area, including the request of the Customer who will own the new 230-34 kV substation. The scope of work required to serve this load is comprised of two phases. Only the first phase of the Project is the subject this Letter of Notification. Any additional high-voltage ("HV") transmission line work associated with the second phase of work will be the subject of a future letter of notification or siting application, as may be necessary and appropriate under the Commission's regulations.

The first phase of the Project ("Phase 1") involves the construction of new HV transmission lines to accommodate multiple customer requests to serve new and future load in the area, including the request of the Customer who will own the new 230-34kV substation. The Customer is initially requesting transmission level service in Hazle Township, Luzerne County, Pennsylvania to the

[1] While the instant LON is needed forthwith to connect the Customer to the 230kV grid through the Customer-owned substation and the Tomhicken Switchyard, PPL Electric did receive more than one customer request for transmission level service. As such, PPL Electric anticipates that the Tomhicken Switchyard will interconnect to a second, customer-owned substation. However, any future project or constructions needed to interconnect the other requesting customer will be undertaken as the subject of a future, standalone filing before the Commission.

230 kV system. To meet the Customer's initial needs, PPL Electric's system planners determined that splitting the adjacent Susquehanna-Harwood #1 & #2 230 kV Transmission Lines, creating the Susquehanna-Tomhicken #1 & #2 230 kV and Tomhicken-Harwood #1 & #2 230 kV lines, and providing 230 kV service from the new Tomhicken 230kV Switchyard is the optimal solution to serve the Customer's initial requested load.

PPL anticipates that a second phase of transmission expansion ("Phase 2") will be needed in order to address future electrical needs and demands associated with this Customer and with other load requests, as well as PPL Electric's system needs. PPL Electric provides this additional detail at this time for informational purposes only. Phase 2 will require construction of a new 230 kV switchyard ("Nescopeck 230 kV Switchyard") west of the existing Susquehanna 230 kV Switchyard. The existing Sunbury-Susquehanna 230 kV line will be split into the new Nescopeck 230 kV Switchyard. The section of the Sunbury-Susquehanna 230 kV line between the Nescopeck 230 kV Switchyard and the Susquehanna 230 kV Switchyard will be rebuilt to double-circuit 230 kV operation. Two new 230 kV lines will be extended south from the new Nescopeck 230 kV Switchyard with one line terminating at the Tomhicken 230 kV Switchyard and one line at the Harwood 230-69 kV Substation. Phase 2 will resolve projected overloads on the Susquehanna-Tomhicken 230 kV lines due to customer load addition. This project will create another path for power to travel south from the Susquehanna 230 kV Switchyard. This will increase operational flexibility, the ability to take line outages in the area, and reliability of the 230 kV system. The newly-created path south from the Susquehanna 230 kV Switchyard will allow this Customer to connect to the system as well as other load customers in the Hazleton area. At a future date, Phase 2 will be submitted in an appropriate filing before the PUC. PPL Electric notes that the phases are being submitted separately because only the first phase is required to meet the Customer's in-service request; the second phase will not be necessary until the Customer's load increases at a future date. Additionally, the Company anticipates that Phase 2 will require a full siting application.

The proposed transmission line system will be designed according to, and generally exceed, all National Electrical Safety Code ("NESC") standards. Design specifications and safety rules adhered to by PPL Electric are included as **Attachment 4**.

2.0 DESCRIPTION OF THE EXISTING AND PROPOSED 230 KV LINES AND STRUCTURES

The existing double-circuit 230 kV transmission lines include 1113 kcmil[2], 54/19 stranding, "Finch" ACSS[3] conductor wires and are supported by double-circuit steel lattice towers. The arrangement also includes two optical ground wires ("OPGW").

A detailed aerial exhibit of the Project alignment is provided as **Figure 3-1** in **Attachment 3 – Description of Project Area.**

The three existing structures to be removed range in height between 130 and 133 feet, with an average height of 132 feet. The proposed monopole structures to be constructed will range in height from between approximately 100 and 140 feet with an average height of approximately 118 feet. **Table 2-1** provides a summary of the number and heights of the existing and proposed structures. **Figures 2-1** through **2-4** depict typical structure types that will be used for the new 230 kV transmission lines.

Table 2-1. Existing and New Transmission Line Structures

Transmission Line	No. of Existing Structures	Existing Structure Height Range (feet)	Proposed No. of New Structures	Proposed Structure Height Range (feet)	Applicable Framing/ Specifications
Existing Susquehanna-Harwood 230 kV (to be removed)	3	130-133	0	N/A	N/A
Proposed Susquehanna-Tomhicken 230 kV (N1-N3)	0	N/A	3	105-140	7-009-001 7-009-004 7-009-005
Proposed Tomhicken-Harwood 230 kV (S1-S8)	0	N/A	8	100-140	7-009-001 7-009-004 7-009-005 7-009-061
Connecting Structure (N4)	0	NA	1	110	7-009-004
Future Use Connecting Structure (S9)	0	N/A	1	115	7-009-004

[2] A kcmil is a thousand circular mils. A circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm^2.
[3] ACSS stands for aluminum conductor steel supported.

Table 2-1. Existing and New Transmission Line Structures					
Transmission Line	**No. of Existing Structures**	**Existing Structure Height Range (feet)**	**Proposed No. of New Structures**	**Proposed Structure Height Range (feet)**	**Applicable Framing/ Specifications**
Total	**3**		**13**		

As explained in **Attachment 1 – Necessity Statement**, the approximate 1.3 miles (1.1 miles of Tap Lines and two 0.1-mile segments of Connecting Lines) of new 230 kV transmission lines to be constructed and the approximate 0.8 miles of existing transmission lines to be removed are located entirely on property owned by the Customer or PPL Electric. PPL Electric owns the existing Susquehanna-Harwood 230 kV 150-foot-wide ROW corridor in this area. Since the rebuilt 230 kV transmission lines are contained entirely within these properties, no new ROW is required on land not already owned by the Customer or PPL Electric (see **Attachment 3 – Description of Project Area**).

The new Susquehanna-Tomhicken 230 kV Tap Line will be extended approximately 0.3 miles and include three new steel monopole support structures. The new Tomhicken-Harwood 230 kV Tap Line will be extended approximately 0.8 miles and will include 8 new steel monopole structures. Additionally, there will be two 0.1-mile Connecting Lines, and two new steel monopole support structures utilized to interconnect the new Tomhicken Switchyard and the Customer-owned substation. Please see **Figure 3-1** in **Attachment 3** – **Description of Project Area.**

The new 230 kV transmission lines will be double-circuit and have two OPGWs. The conductors will be 1590 kcmil[4], 54/19 stranding, "Falcon" ACSR[5]. The fiber optic ground wire will be dual 144 count OPGW. The minimum conductor-to-ground clearance will be approximately 33.5 feet, which occurs at a maximum conductor temperature of 125°C (257°F). The design minimum conductor clearances and conductor thermal ratings for the proposed 230 kV lines are shown in **Tables 2-2** and **2-3**. Design specifications and safety rules practiced by PPL Electric are included in **Attachment 4** – **Design Criteria and Safety**.

[4] A kcmil wire size is the equivalent cross-sectional area in thousands of circular mils. A circular mil is the area of a circle with a diameter of one thousandth (0.001) of an inch.
[5] ACSR stands for aluminum conductor steel reinforced.

Table 2-2. Design for Minimum Conductor Clearances for Selected Conductor[6]	
Condition	**Transmission Double-Circuit Design**
Heavy Ice (1” Ice at 0°C ambient temperature)	33.5 feet (Clearance-to-Ground)
Predicted extreme thermal load (125°C conductor temperature)	33.5 feet (Clearance-to-Ground)
Predicted blowout (6 psf, 16°C ambient temperature)	11.5 feet (Lateral movement)

Table 2-3. Conductor Thermal Rating 1590 kcmil 54/19 Stranding Falcon ACSR – 125°C Normal Maximum Conductor			
Condition	**Ambient Temperature (°C)**	**Wind Speed (Ft./sec)**	**Ampacity (Amps)**
Summer Normal	35	0	3000
Winter Normal	10	0	3700
Summer Emergency	35	2.533	4000
Winter Emergency	10	2.533	4500

[6] Clearances based on an initial maximum tension of 6,000-10,000 pounds at 0.5-inch ice, 0°F, 4# wind and maximum ruling span of 200-1,250 feet.

Figure 2-1. Typical 230 kV Double-Circuit Steel Pole

0° to 1° Suspension Structure (7-009-001)

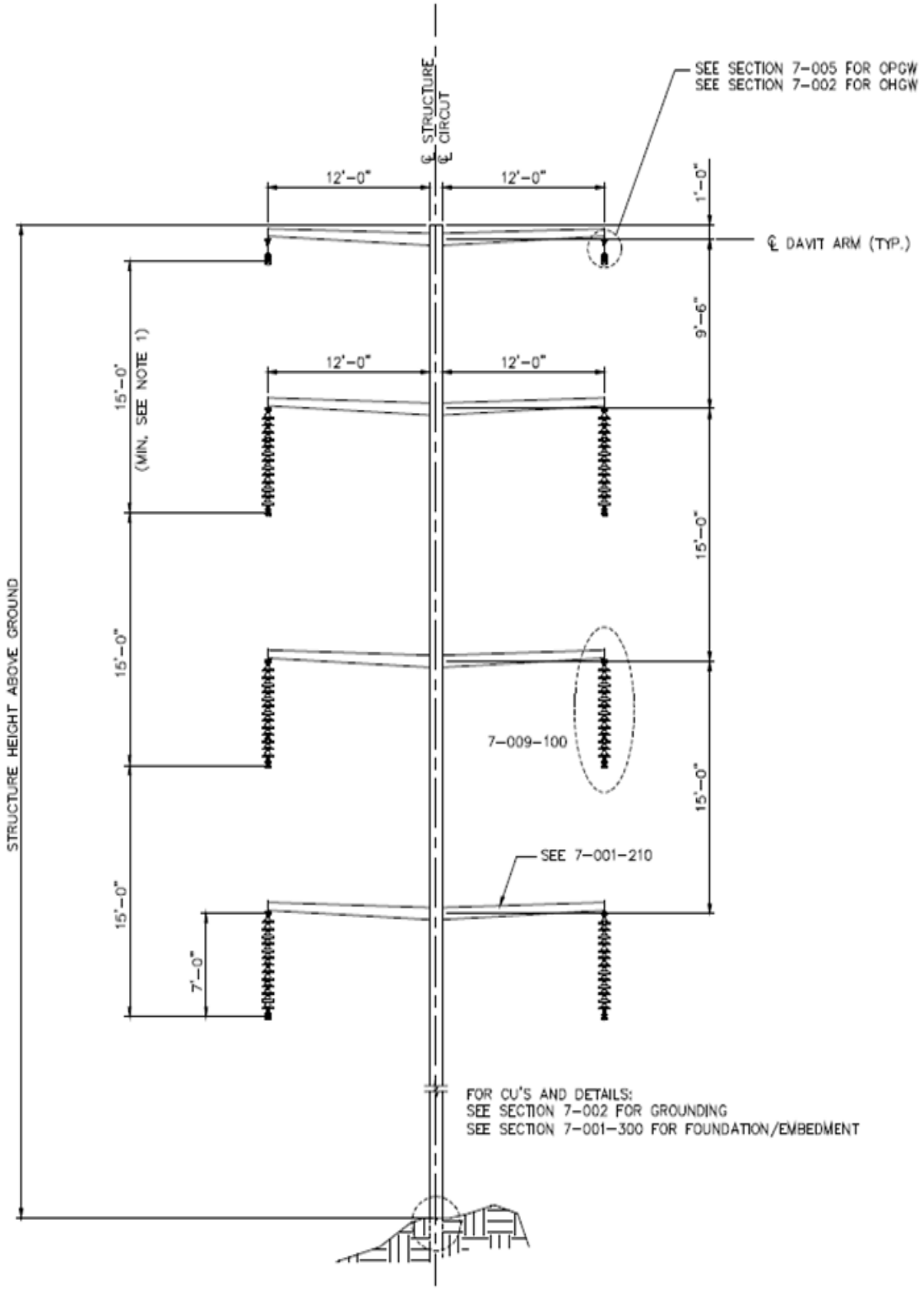


Figure 2-2. Typical 230 kV Double-Circuit Steel Pole

0° to 90° Angle Tension on Arm Structure (7-009-004)

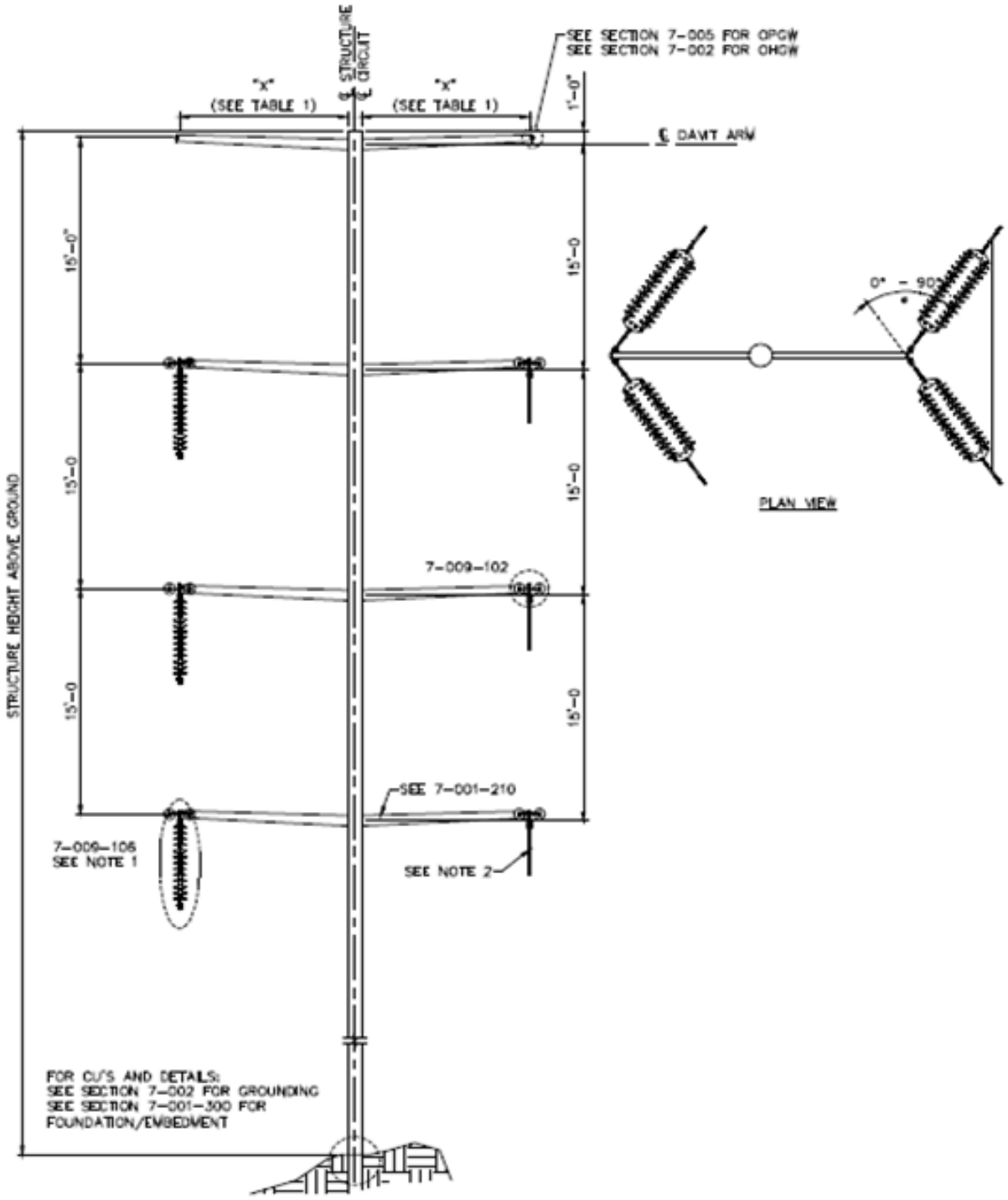


Figure 2-3. Typical 230 kV Double-Circuit Steel Pole
0° to 90° Angle Tension on Pole Structure (7-009-005)

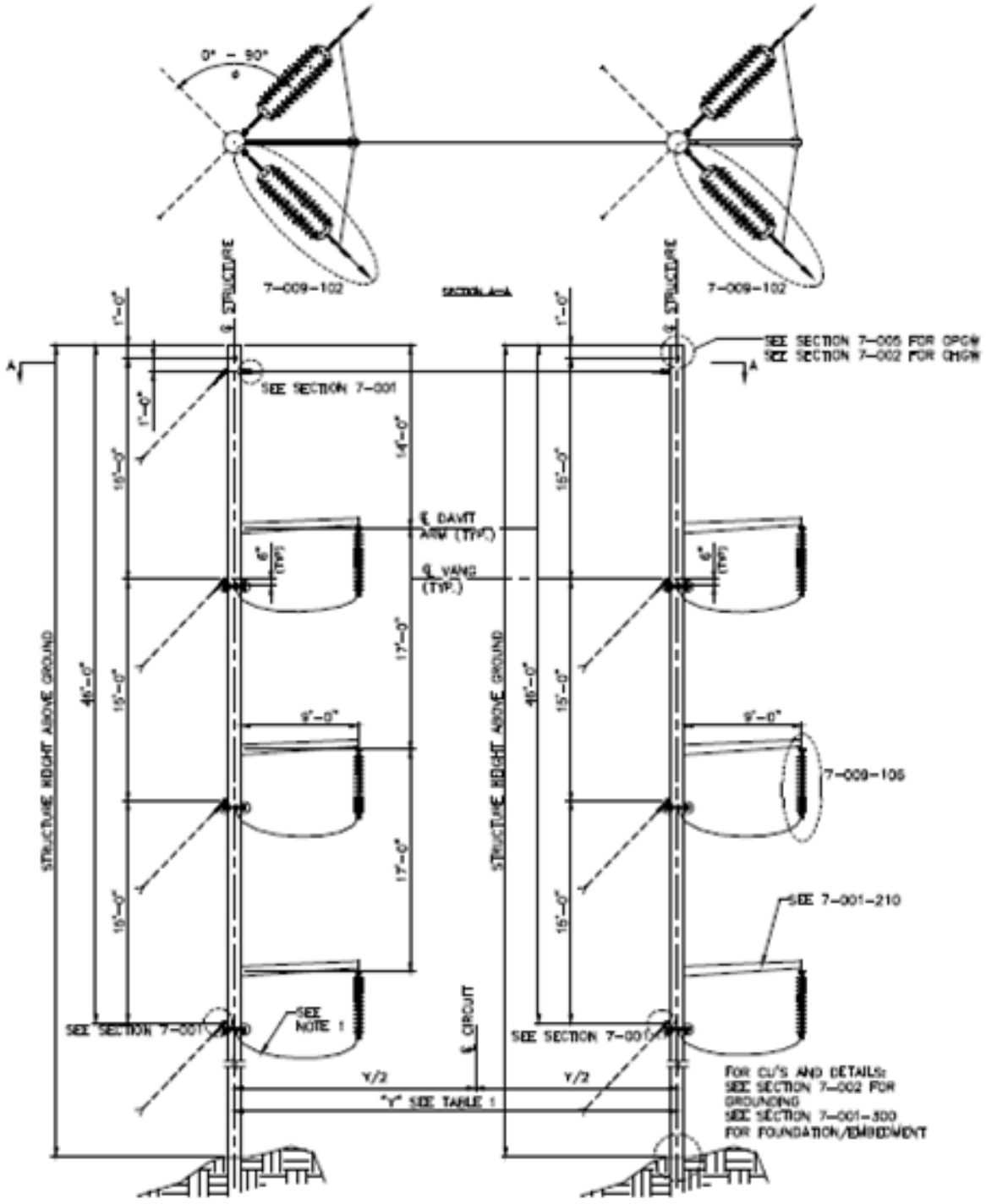
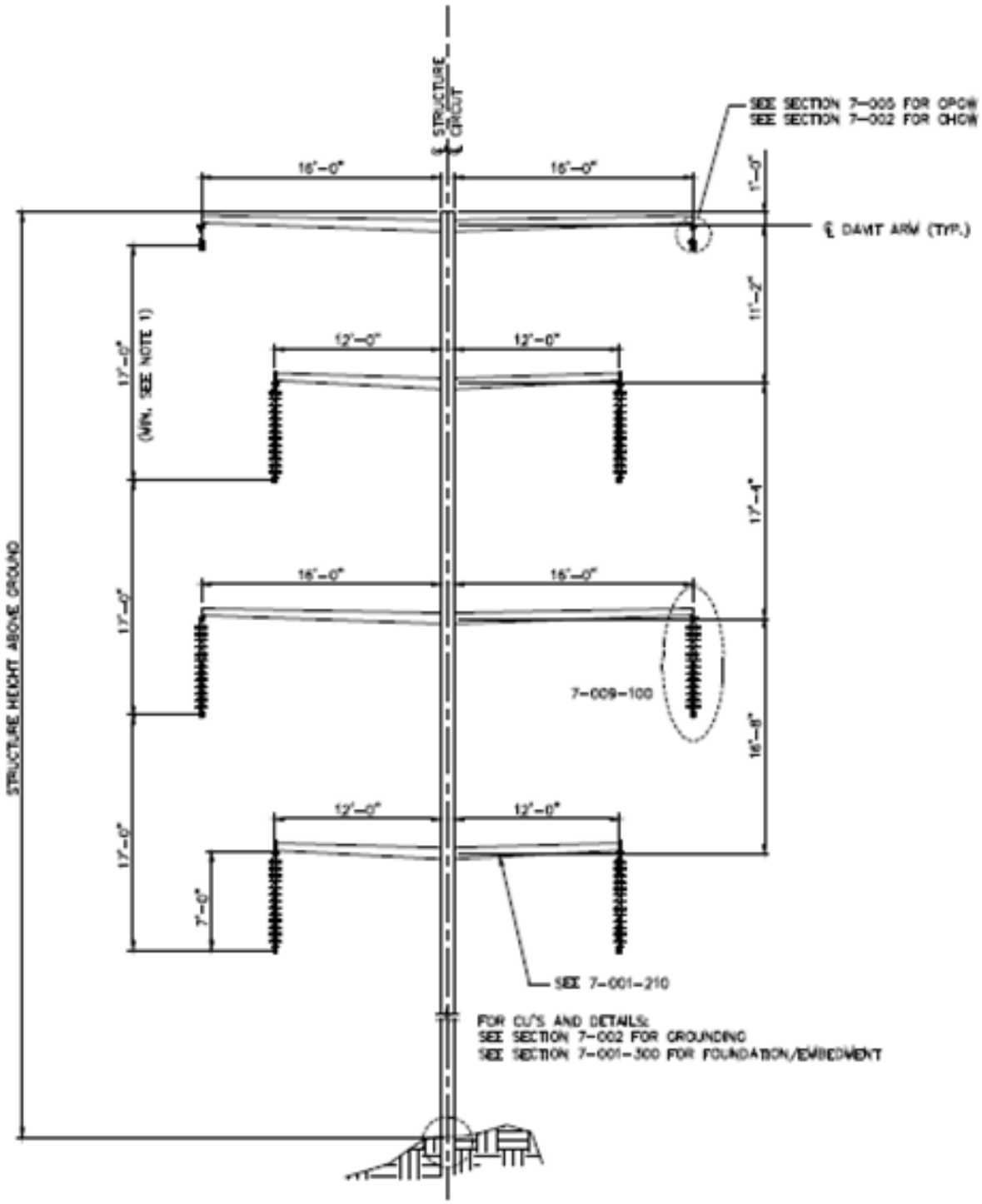


Figure 2-4. Typical 230 kV Long Span Double-Circuit Steel Pole 0° to 1° Suspension Structure (7-009-061)



PPL ELECTRIC
ATTACHMENT 3

TOMHICKEN 230 KV SWITCHYARD PROJECT

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1.0 INTRODUCTION

As explained in **Attachment 1 – Necessity Statement** to this Letter of Notification ("LON"), and in the LON and other associated attachments, PPL Electric Utilities Corporation ("PPL Electric") is requesting Pennsylvania Public Utility Commission ("PUC" or "Commission") approval to build approximately 1.1 miles of new double-circuit 230 kilovolt ("kV") transmission taps ("Susquehanna-Tomhicken #1 & #2 230 kV and Tomhicken-Harwood #1 & #2 230 kV lines" or "Tap Lines") that are needed to connect the existing Susquehanna-Harwood #1 & #2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard (the "Project"). The Project also includes constructing two new 0.1-mile-long 230 kV transmission lines ("Connecting Lines") from the Tomhicken 230kV Switchyard to a new customer-owned 230-34 kV substation. The new 230 kV Connecting Lines, Tap Lines and Tomhicken Switchyard are located in Hazle Township, Luzerne County, Pennsylvania. PPL Electric has designed the proposed transmission line system so that it fits entirely within existing PPL Electric right-of-way ("ROW") and the customer's (the "Customer") property. PPL Electric is working with the Customer to finalize necessary easements.

As explained in greater detail in **Attachment 1 – Necessity Statement**, the Project is needed to accommodate multiple customer requests[1] to serve new and future load in the area, including the request of the Customer who will own the new 230-34 kV substation. The scope of work required to serve this load is comprised of two phases. Only the first phase of the Project is the subject this LON. Any additional high-voltage ("HV") transmission line work associated with the second phase of work will be the subject of a future letter of notification or siting application, as may be necessary and appropriate under the Commission's regulations.

The first phase of the Project ("Phase 1") involves the construction of new HV transmission lines. Phase 1, subject to this Letter of Notification, is needed to connect the Customer requesting transmission level service in Hazle Township, Luzerne County, Pennsylvania to the 230 kV system. PPL Electric's system planners determined that splitting the adjacent Susquehanna-

[1] While the instant LON is needed forthwith to connect the Customer to the 230kV grid through the Customer-owned substation and the Tomhicken Switchyard, PPL Electric did receive more than one customer request for transmission level service. As such, PPL Electric anticipates that the Tomhicken Switchyard will eventually interconnect to a second, customer-owned substation. However, any future project or constructions needed to interconnect the other requesting customer will be undertaken as the subject of a future, standalone filing before the Commission.

Harwood #1 & #2 230 kV Transmission Lines, creating the Susquehanna-Tomhicken #1 & #2 230 kV and Tomhicken-Harwood #1 & #2 230 kV lines, and providing 230 kV service from the new Tomhicken 230 kV Switchyard is the optimal solution to serve the Customer's initial requested load.

PPL Electric anticipates that a second phase of transmission expansion ("Phase 2") will be needed to address future electrical needs and demands associated with this Customer and with other load requests, as well as PPL Electric's system needs. PPL Electric provides this additional detail at this time for informational purposes only. Phase 2 will involve the construction of a new 230 kV switchyard ("Nescopeck 230 kV Switchyard") west of the existing Susquehanna 230 kV Switchyard. The existing Sunbury-Susquehanna 230 kV line will be split into the new Nescopeck 230 kV Switchyard. The section of the Sunbury-Susquehanna 230 kV line between the Nescopeck 230 kV Switchyard and the Susquehanna 230 kV Switchyard will be rebuilt to double-circuit 230 kV operation. Two new 230 kV lines will be extended south from the new Nescopeck 230 kV Switchyard with one line terminating at the Tomhicken 230 kV Switchyard and one line at the Harwood 230-69 kV Substation. Phase 2 will resolve projected overloads on the Susquehanna-Tomhicken 230 kV lines due to the customer load addition. This project will create another path for power to travel south from the Susquehanna 230 kV Switchyard. This will increase operational flexibility, the ability to take line outages in the area, and reliability of the 230 kV system. The newly created path south from the Susquehanna 230 kV Switchyard will allow this Customer to connect to the system as well as other load customers in the Hazleton area. At a future date, Phase 2 will be submitted in an appropriate filing before the PUC. PPL Electric notes that the phases are being submitted separately because only the first phase is required to meet the Customer's in-service request; Phase 2 will not be necessary until the Customer's load increases at a future date. Additionally, the Company anticipates that Phase 2 will require a full siting application.

The Project is located on property owned by PPL Electric and by the Customer. The Project will support the Customer's facilities by connecting them to the Tomhicken Switchyard and ultimately, the existing electric grid. The entire Project is within Hazle Township, Luzerne County, Pennsylvania. PPL Electric has provided information about the proposed Project to representatives from Hazle Township and Luzerne County.

The proposed Tomhicken Switchyard and Customer substation will be co-located approximately 1.8 miles southwest of the State Route 93 (SR 93) and Interstate 81 (I-81) interchange, outside the incorporated borough of West Hazleton.[2] As explained in **Attachment 1 – Necessity Statement**, PPL Electric plans to construct the new Tomhicken Switchyard and 230 kV Tap and Connecting Lines to interconnect the Customer's 230 kV substation with the Transmission Grid. The 230 kV Tap Lines will be located partially within existing PPL Electric fee-owned property and within approximately 11 acres of 150-foot-wide ROW located on the Customer's property, which the Customer will be required to and has agreed to grant to PPL Electric.

The Project requires the installation of 13 new structures, which will be constructed on properties owned by PPL Electric or the Customer. A network of existing and new access roads will be utilized during construction of the transmission lines, switchyard, and substation. New access roads will be constructed and located within the 150-foot-wide ROW. A detailed map of the proposed Project is provided in **Figure 3-1.**

[2] PPL Electric notes that it has discussed the Project with the Borough of West Hazelton. Based upon these discussions and the Company's understanding of certain zoning requirements applicable in this borough, PPL Electric will submit a petition for exemption from local zoning requirements related to the Project, as explained in greater detail in the Letter of Notification.

Susquehanna-Tomhicken #1 & #2 230 kV Lines

From the existing Susquehanna Substation, the Susquehanna-Tomhicken #1 & #2 230 kV Transmission Lines travel south towards the proposed Tomhicken Switchyard. The ROW for the section near the proposed Tomhicken Switchyard is further described below and shown in **Figure 3-1**:

- From Structure N1A/N1B, the Project extends east approximately 0.3 miles to the proposed Tomhicken Switchyard. The lines involve one double-circuit steel pole suspension structure (7-009-001), one double-circuit steel pole angle tension on arm structure (7-009-004), and one double-circuit steel angle tension on pole structure (7-009-005). These structures are to be located on PPL Electric fee-owned property acquired from the Customer.

Tomhicken-Harwood #1 & #2 230 kV Lines

From the existing Harwood Substation, the Tonhicken-Harwood #1 & #2 230 kV Transmission Lines travel north towards the proposed Tomhicken Switchyard. The ROW for the section near the proposed Tomhicken Switchyard is further described below and shown in **Figure 3-1**:

- From Structure S1A/S1B, the Project extends northeast and north approximately 0.8 miles to the proposed Tomhicken Switchyard. The lines involve two double-circuit steel pole suspension structures (7-009-001), four double-circuit steel pole angle tension on arm structures (7-009-004), one double-circuit steel angle tension on pole structure (7-009-005), and one long-span double-circuit steel pole suspension structure (7-009-061). These structures are located partially on PPL Electric fee-owned property and partially on Customer property where easements have been acquired from the Customer.

Connecting Lines

From the proposed Tomhicken Switchyard, the two Connecting Lines travel east approximately 0.1 mile to the proposed Customer-owned substation. This segment includes two double-circuit steel pole angle tension on arm structures (7-009-004). These structures are located partially on PPL Electric fee-owned property and partially on Customer property where easements have been acquired from the Customer.

2.0 LAND USE

PPL Electric evaluated the existing land uses on the PPL Electric and Customer-owned properties, within the existing ROW, and within 0.25 mile of the Project centerline ("Project Area"). This broader Project Area was reviewed to provide a sense of the landscape in which the Project is located. Based on review of current aerial maps, land use in the Project Area is 90% forest and 10% existing utility ROW[3]. The Project Area is generally bounded to the north by Black Creek and Grassy Path Road, to the east by undeveloped forested land owned by the Customer, to the south by commercial/industrial warehouses associated with Humboldt Industrial Park and Stony Creek, and to the west by residential properties within the community of Eagle Rock Resort. Land uses immediately surrounding the Project Area predominantly consist of vacant forested land or developed residential land.

The closest communications tower is located approximately 1.7 miles northeast of the Project. A natural gas pipeline operated by UGI Utilities, Inc., travels northwest to southeast and is crossed by the Project. An abandoned railroad (Lehigh Valley Railroad) owned by Norfolk Southern traverses 0.4 miles north of the Project, generally in an east-west direction. Additionally, an existing PPL Electric distribution line crosses the Project in a general north/northwest to south/southeast direction between proposed Structures S5 and S6, as well as proposed Structures S2 and S3. The PPL Electric distribution line will be relocated within the Customer's property as part of the Project, because its current location is in conflict with the planned location of the Customer-owned substation.

The closest active airport relative to the Project Area is the Hazleton Regional Airport, a publicly owned facility, located approximately 3.8 miles northeast of the Project. Additionally, one private heliport, the Lehigh Valley Hospital Heliport, is located approximately 5 miles southeast of the Project. PPL Electric does not anticipate any interference with airport or heliport operations since the Project consists of new electrical facilities that are of a similar height as the existing electrical facilities in the immediate Project Area. However, PPL Electric will file any required documentation with the Federal Aviation Administration.

[3] Associated ROW for the existing Susquehanna-Harwood #1 & #2 230 kV Transmission Lines.

Conserved Lands

The proposed Project will not affect any national parks, state parks, local parks, recreational areas, or natural landmarks, or other conserved lands as none are located within the Project Area.

3.0 CULTURAL RESOURCES

An online review of the Project Area and surrounding landscape was conducted through the Pennsylvania Historical and Museum Commission ("PHMC") State Historic and Archaeological Resource Exchange site. State Historic Preservation Office ("SHPO") eligible and listed structures and districts within 1 mile of the Project Area are limited to only one eligible district resource: The Lehigh Valley Railroad. The abandoned railroad is located approximately 0.4 miles north of the Project Area, traversing in a general east-west direction, and is not crossed or spanned by the Project. The Project will not affect the abandoned railroad.

PPL Electric has coordinated with the PHMC for the modifications being made to the transmission lines. This coordination is required to receive permits to construct the Project. PPL Electric does not anticipate any impacts to SHPO-listed or -eligible structures or districts. Furthermore, based on the referenced coordination with PHMC and as per a PHMC letter dated April 17, 2025, no archaeological or historic architectural resources will be affected by the proposed project.

4.0 NATURAL FEATURES

Unique Natural Features

No unique geological, scenic, or natural areas are crossed by the Project, according to the Pennsylvania Department of Conservation and Natural Resources ("DCNR").

A Natural Area Inventory ("NAI") has been prepared by The Nature Conservancy in collaboration with the Pennsylvania Natural Heritage Program ("PNHP") for Luzerne County (2006). The Humboldt Barren NAI area is an exceptional-rated natural heritage area located approximately 1,000 feet south/southeast of the Project. This area is characterized as "a dwarf tree forest natural community on a broad high-elevation ridgetop." The Project does not cross the natural areas with

supporting habitat identified within the NAI. Additionally, the majority of the NAI contains developed land associated with the Humboldt Industrial Park.

No other NAI areas or other unique natural features are located within 1 mile of the Project.

Soils

The Project Area is located on gradually undulating land, primarily surrounded by undeveloped forest. Topography within the Project Area ranges between approximately 1,300 feet and approximately 1,700 feet above mean sea level ("msl"). Soils present within the Project Area predominantly consist of silty and sandy loams, ranging between 3 and 25 percent slopes.

Erosion and Sedimentation ("E&S") control plans will be developed and implemented for the Project to minimize the displacement of soils. These plans will require prior approval from the Luzerne County Conservation District. Coverage under the National Pollutant Discharge Elimination System ("NPDES") permit (PAG-02, Discharges of Stormwater Associated with Construction Activities) will also be required from the Pennsylvania Department of Environmental Protection ("PADEP") as needed. During construction, PPL Electric will adhere to all conditions specified in the NPDES permit. Impacts to local soil resources are anticipated to be minimal.

Waterways and Wetlands

The Customer retained an environmental consultant to identify and delineate all waterways and wetlands on its entire property subject to the Project. The Customer's consultant identified 13 wetlands, six waterbodies, three unnamed tributaries ("UNTs") flowing north to Black Creek, and two UNTs flowing northeast to Stony Creek. Of these features, one freshwater emergent ("PEM") wetland and one UNT to Black Creek are crossed by the project. The wetland and stream are not anticipated to be impacted during construction. These delineated features are located on the portion of the Customer's property proposed for future PPL Electric ownership, generally between proposed Structures N2 and N3. No other delineated features on the portion of the Customer's property proposed for future PPL Electric ownership were identified, as these features are generally concentrated in the vicinities of Black Creek to the north and Stony Creek to the south.

This information is being used to minimize wetland and waterway impacts where feasible. The Customer will obtain all necessary permits from PADEP and the United States Army Corps of Engineers (the "USACE") and will comply with all terms and conditions placed on those permits. Additionally, the Customer will consult with Luzerne County Conservation District, prepare any required soil erosion and sedimentation control plans, and obtain NPDES permits and comply with any conditions placed on those permits.

PPL Electric conducted a wetland delineation on their property containing the existing Susquehanna-Harwood 230 kV Transmission Line and identified three wetlands and four tributaries to Stony Creek. Minimal impacts to wetlands are anticipated for the Project. PPL Electric will avoid impacts to wetlands and streams where possible by aerially spanning these features. PPL Electric will obtain all necessary permits from PADEP and USACE and will comply with all the terms and conditions placed on those permits. PPL Electric also will consult with the Luzerne County Conservation District, prepare any required soil erosion and sedimentation control plans, and obtain NPDES permits and comply with any conditions placed on those permits.

100-Year Floodplains and Regulatory Floodway

The National Flood Hazard Layer for Luzerne County, Pennsylvania was obtained through the Federal Emergency Management Agency ("FEMA") Flood Map Service Center website and analyzed for 100-year floodplains and regulatory floodway within the Project Area and surrounding landscape. Based on review of this data, the Project crosses no FEMA 100-year floodplain nor FEMA regulatory floodway. Black Creek to the north and Stony Creek to the south of the Project Area are both within FEMA Zone A, a 100-year floodplain, and has a 1-percent-annual-chance of inundation due to a flood event.

No impacts to the floodplain area of either Black Creek or Stony Creek are anticipated by the proposed Project activities, since the proposed switchyard, substation, and 230 kV structures will be constructed outside of the 100-year floodplains. PPL Electric will coordinate with local agencies for regulated floodplain activities where required.

Vegetation

The Project will be located entirely within property owned by PPL Electric and the Customer. The existing Susquehanna-Harwood 230 kV Transmission Line ROW has been largely cleared of vegetation as part of PPL Electric's standard vegetation management practices. The site for the new PPL Electric switchyard and the Customer's substation is located in an undeveloped wooded area and vegetation clearing is anticipated to accommodate the construction of the new Tomhicken Switchyard and Customer-owned substation. In fall 2024, the Customer began vegetation removal in anticipation of their future development, as well as PPL's proposed facilities.

5.0 THREATENED AND ENDANGERED SPECIES

On March 1, 2024, the Customer's consultant ran a Pennsylvania Natural Diversity Inventory ("PNDI") to assess the potential presence of threatened and endangered species and/or special concern species on the Customer's property. Specific agencies reviewing the Project included the Pennsylvania Game Commission ("PGC"), Pennsylvania Fish & Boat Commission ("PFBC"), PA Department of Conservation and Natural Resources ("DCNR"), and U.S. Fish and Wildlife Service ("USFWS").

The DCNR search indicated that the Project is located in range of a special concerns species. Based on this review, the DCNR determined potential impacts to the following threatened or endangered plant species or plant species of special concern:

- Variable Sedge
- Fall Dropseed Muhly
- Yellow-fringed Orchid
- Lupine
- Screw-stem
- Hartford Fern
- Rough-leaved Aster
- White-fringed Orchid
- Herbaceous Vernal Pond
- Hemlock-Mixed Hardwood Palustrine Forest
- Pitch Pine – Rhodora – Scrub Oak Woodland

The DCNR requested that a botanical survey be completed for the above listed species by a qualified botanist at the appropriate time of year, and the agency recommended that a Wild Plant Management Permit be obtained before botanical surveys occur. A botanical survey is to be conducted during the appropriate time of year, as requested by the DCNR.

The PGC advised a conservation measure and deferred comments to the USFWS, and the PFBC reported no known impacts to threatened and endangered species and/or special concern species and resources within the Project Area. Therefore, no further consultation with PGC or PFBC is required for this Project.

The USFWS search indicated that the Project is located in range of a special concern species or resource and a sensitive species. Given the Project Area contains suitable bat habitat, including rock outcrops, caves, forest canopy, wetlands, and streams, the Customer completed bat habitat surveys on a portion of PPL Electric's property and the entire Customer-owned property from June through October of 2024. Overall, nine rock outcrops located on the property were identified as potential bat hibernacula. Four of these areas were located in the northwest portion of the Customer's property, four were identified in the southern portion of the property, and one was observed in the northeast portion of the property. Ultimately the consultant who performed the investigation determined that tree clearing associated with the Project (conducted between October 1st and March 31st) would not impact potential summer roosting sites or winter hibernacula, given that the identified areas are located outside of the proposed limits of disturbance. The Customer commenced tree clearing activities for the Project in fall 2024.

On November 27, 2024, PPL Electric ran a PNDI for their property crossed by the existing Susquehanna-Harwood 230kV Transmission Line. Both the PGC and PFBC indicated no further consultation is required for the Project. The DCNR search indicated that the Project is located within the range of the *Bartonia paniculata ssp. paniculata*, a special concern species of screw-stem found in sandy or peaty acidic wetlands and yielded "Potential Impact – Further Review Required". According to the Luzerne County NAI, screw-stem is present within the county. On August 7 and 8, 2025, PPL's Electric's Permitting Contractor conducted the field survey for Screw-stem (*Bartonia paniculata ssp. paniculata*) and the results were submitted to the DCNR via

a Field Survey Summary Report. In response, the DCNR issued a letter, dated 9/29/2025, stating that no impact was anticipated per the survey with minimization and conservation measures with no further coordination needed for this project. However, PPL Electric will coordinate with DCNR to utilize minimization, conservation, and avoidance measures and adhere to all applicable regulations and permit requirements.

The USFWS search indicated that the Project is located in the vicinity of northern long-eared bat habitat. The USFWS response indicated tree removal should not occur from May 15th to August 15th. Because tree removal activities will occur outside of the active bat window, PPL Electric does not anticipate any impact to the northern long-eared bat.

PPL Electric will continue to consult with the jurisdictional agencies regarding potential impacts to protected species, complete all required surveys; obtain all necessary approvals and permits for Project construction; and comply with all conditions placed on those permits.

Figure 3-1. Aerial Map of the Project

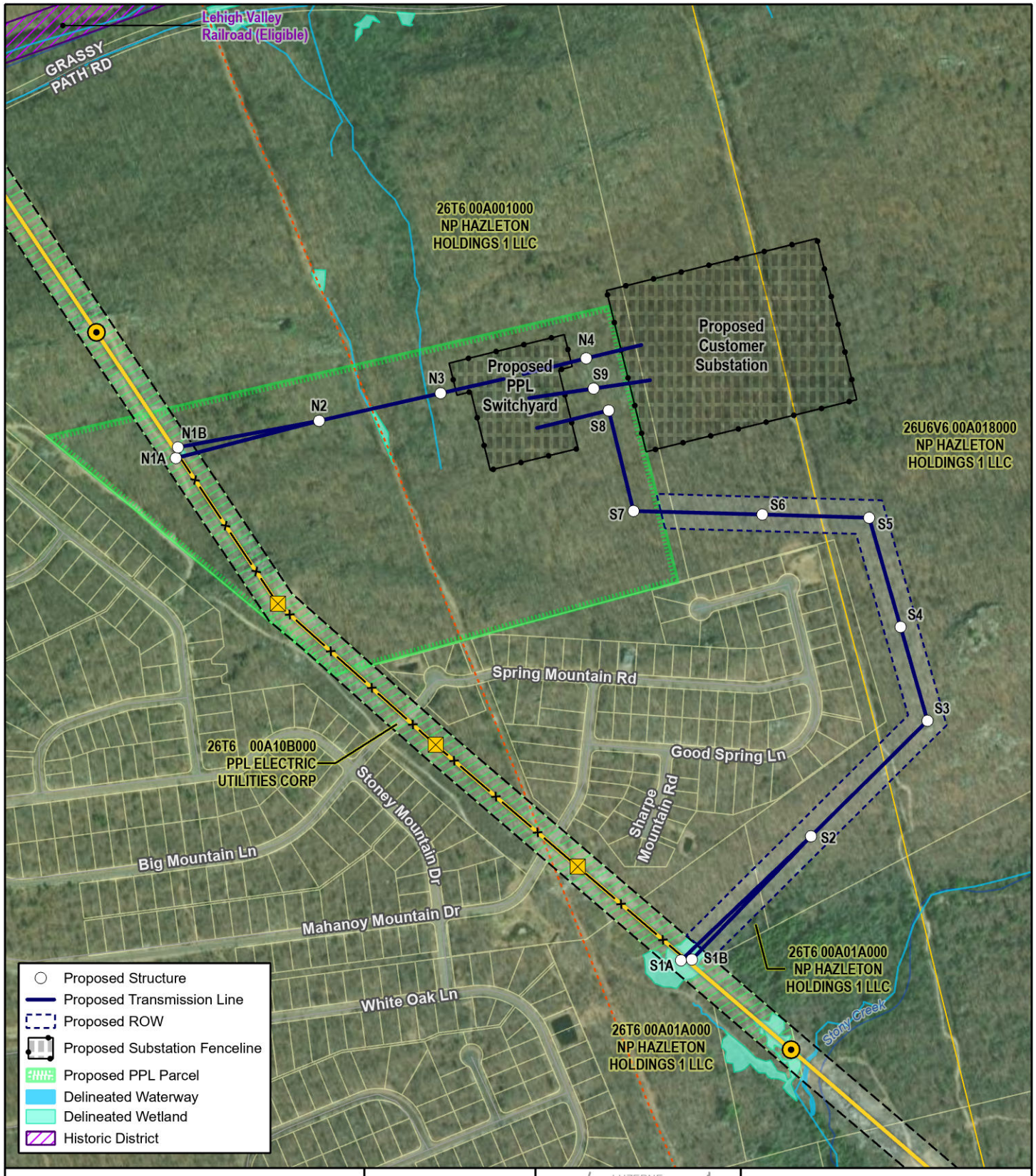


Figure 3-1
Aerial Map
Tomhicken 230 kV Transmission Line Project

PPL ELECTRIC
ATTACHMENT 4

TOMHICKEN 230 KV SWITCHYARD PROJECT

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1.0. DESIGN CONSIDERATIONS

PPL Electric Utilities Corporation's ("PPL Electric") new and rebuilt transmission lines are designed according to, and generally exceed, all National Electric Safety Code ("NESC") minimum standards. The NESC is a set of rules guiding safety standards during the installation, operation, and maintenance of electric power lines. The NESC contains the basic provisions considered necessary for the safety of employees and the public. Although it is not intended as a design specification, its provisions establish minimum design requirements. PPL Electric has developed design specifications and safety rules which meet or surpass all requirements specified by the NESC.

The NESC includes loading requirements and clearances for the design, construction, and operation of power lines. The "loads" on conductors and supporting structures are the mechanical forces that develop from the weight of the conductors, the weight of ice on the conductors, plus wind pressure on the conductors and supporting structures. Loading requirements are the loads on the conductors and structures that are anticipated assuming certain ice and wind conditions. Loading requirements always contain "safety factors" to allow for unknown or unanticipated contingencies. The clearances and loading requirements contained in the NESC are designed to maintain public safety.

The NESC specifies strength and loading rules based on three different "grades of construction" for conductors and supporting structures:

- Grade B – This grade of construction provides the highest margin of safety and is required when the pole supports spans that cross limited access highways, railroads, and waterways.
- Grade C – This grade of construction is most common and provides a basic margin of safety. It is often utilized for the typical power and joint-use distribution pole.
- Grade N – This is the lowest grade of construction and is most often used for emergency and temporary construction.

PPL Electric designs all of its transmission lines for Grade B construction. The use of Grade B design and construction translates to higher levels of structural reliability and safety to withstand the environmental conditions of ice and/or wind loading.

PPL Electric's rigorous design standards are further incorporated into the parameters utilized to account for ice and wind loadings on the wires and structure. Structure loading and line designs must accommodate a variety of operating conditions as different ice and wind combinations can impact the conductor sags and tensions of the line. PPL Electric's transmission lines are designed to exceed NESC requirements by accounting for additional load cases due to various ice and wind loading conditions beyond what is required by NESC. This means that PPL Electric lines are designed to operate safely and reliably during extreme inclement weather. In addition, PPL Electric design standards include a clearance to ground buffer in excess of NESC required clearances to account for construction and design tolerances and the filling or grading of land within the right-of-way by property owners. This buffer also significantly reduces the risk of a property owner inadvertently contacting a transmission line. This has occurred on PPL Electric's system in the past and higher clearances minimize the likelihood of future occurrences.

Table 4-1. 69 kV Vertical Clearance to Ground

Surface Underneath Conductors	NESC Standard Clearance	PPL Electric Clearances
Roads, streets, and other areas subject to truck traffic	19.2 Ft.	22.2 Ft.
Other land traversed by vehicles such as cultivated grazing, forest, orchards, etc.	19.2 Ft.	22.2 Ft.
Spaces and ways subject to pedestrians or restricted traffic only	15.2 Ft.	22.2 Ft.
Track rails of railroads (except electrified railroads using overhead trolley conductors)	27.2 Ft.	30.2 Ft.

Table 4-2. 138 kV Vertical Clearance to Ground		
Surface Underneath Conductors	**NESC Standard Clearance**	**PPL Electric Clearances**
Roads, streets, and other areas subject to truck traffic	20.6 Ft.	23.6 Ft.
Other land traversed by vehicles such as cultivated grazing, forest, orchards, etc.	20.6 Ft.	23.6 Ft.
Spaces and ways subject to pedestrians or restricted traffic only	16.6 Ft.	23.6 Ft.
Track rails of railroads (except electrified railroads using overhead trolley conductors)	28.6 Ft.	31.6 Ft.

Table 4-3. 230 kV Vertical Clearance to Ground		
Surface Underneath Conductors	**NESC Standard Clearance**	**PPL Electric Clearances**
Roads, streets, and other areas subject to truck traffic	22.5 Ft.	25.5 Ft.
Other land traversed by vehicles such as cultivated grazing, forest, orchards, etc.	22.5 Ft.	25.5 Ft.
Spaces and ways subject to pedestrians or restricted traffic only	18.5 Ft.	25.5 Ft.
Track rails of railroads (except electrified railroads using overhead trolley conductors)	30.5 Ft.	33.5 Ft.

Table 4-4. 500 kV Vertical Clearance to Ground		
Surface Underneath Conductors	**NESC Standard Clearance**	**PPL Electric Clearances**
Roads, streets, and other areas subject to truck traffic	28.4 Ft.	31.4 Ft.
Other land traversed by vehicles such as cultivated grazing, forest, orchards, etc.	28.4 Ft.	31.4 Ft.
Spaces and ways subject to pedestrians or restricted traffic only	24.4 Ft.	31.4 Ft.
Track rails of railroads (except electrified railroads using overhead trolley conductors)	36.4 Ft.	39.4 Ft.

A relay protection system is also used on PPL Electric's transmission lines to protect public safety, as well as the equipment on the transmission system. The purpose of relay protection is to automatically de-energize the line in the unlikely event that the line or supporting structure fails and the line contacts the ground.

2.0. PERIODIC MAINTENANCE PROGRAM ON ALL TRANSMISSION LINES

To ensure continued public safety and integrity of service, a periodic maintenance and inspection program is implemented for every transmission line. The program is administered using helicopter patrols, with supplemental foot patrols as needed. Helicopter patrols are performed on all lines on a predetermined frequency, depending on voltage level. The two-man helicopter crew flies parallel to and above the line so that the observer can look for signs of line damage or deterioration and observe clearances between vegetation and conductors. The observations are included in a report that is forwarded to the appropriate department for corrective action.

3.0. PERSONNEL SAFETY RULES

Overall, PPL Electric designs and constructs projects with high regard to both public and employee safety and follows or exceeds all codes and requirements. The following are a few examples of PPL Electric's safety rules that demonstrate its dedication to employee and contractor safety:

- Procedures have been developed to allow work to be performed on energized facilities in a safe manner. When lines or apparatus are removed from service to be worked on, the Energy Control Process system is applied. This system provides that a red tag must be physically placed on the control handle of the de-energized equipment.
- The red tag may be removed only after proper authorization to energize the equipment has been received.
- Various other tags are used for limited operations and informational purposes.
- Employees or contractors will not apply or remove a tag or change the status of tagged equipment unless authorized.

- Temporary safety grounds are used on de-energized facilities for employee lineman safety during maintenance, construction, or reconstruction work. Safety grounds are wires connecting the de-energized facility to an electrical ground. If the facility should be energized, the safety grounds will divert the current directly to ground and reduce the likelihood of personal injury.
- Before applying grounds, a test is done to confirm that the line is de-energized. The voltage test device is checked before and after use to assure reliability.
- Poles or structures are inspected and examined for structural integrity before climbing. If there is any reason to believe that a pole is unsafe, it is stabilized before work is performed. Appropriate safety gear in the form of body belts, safety straps, hard hats, gloves, etc., is worn by linemen during line work activity.

4.0 MAGNETIC FIELD MANAGEMENT PLAN

PPL Electric's Magnetic Field Management Program is applied to new and reconstructed transmission line projects. Although there is no current scientific evidence demonstrating that magnetic fields cause any adverse health effects or pose a health or safety threat to the public, PPL Electric has established a policy to design its new and rebuilt transmission lines to reduce magnetic fields. To lower magnetic field exposures, the program generally prescribes the use of a line design that provides ground clearances higher than the required minimum NESC ground clearance and reverse phasing of new double circuit lines where it is feasible to do so at low or no cost. The implementation of additional modifications to reduce magnetic field levels is considered, provided those modifications can be made at low or no cost and will not interfere with the operation of the line.

The program will be applied to this Project and the Project is designed with clearances that are at least 3 feet higher than NESC standards.

PPL ELECTRIC
ATTACHMENT 5

TOMHICKEN 230KV SWITCHYARD PROJECT

State Agencies

Pennsylvania Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building 400 North Street
2nd Floor, Room-N201 Harrisburg, Pennsylvania 17120
Attn: Alison Kaster

Pennsylvania Department of Environmental Protection
400 Market Street
10th Floor Rachel Carson State Office Building
Harrisburg, Pennsylvania 17101
Attn: Regional Permit Coordination Office

Pennsylvania Department of Transportation
Commonwealth Keystone Building
400 North Street, Fifth Floor
Harrisburg, Pennsylvania 17120
Attn: Jeffrey M. Spotts, Chief Counsel

Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, Second Floor 400
North Street Harrisburg, Pennsylvania 17120-0053
Attn: Catherine N. Lantzy, Chief Counsel

Pennsylvania Department of Conservation and Natural Resources
Rachel Carson State Office Building
400 Market Street Harrisburg, Pennsylvania 17105-8767
Attn: Rebecca Bowen, Chief, Conservation Science & Ecological Resources Division

Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, Pennsylvania 17110-9797
Attn: Timothy Haydt, Director, Bureau of Wildlife Habitat Management

Pennsylvania Fish and Boat Commission
Centre Region Office
595 East Rolling Ridge Drive
Bellefonte, Pennsylvania 16823-9620
Attn: Christopher A. Urban, Chief, Natural Diversity Section

Pennsylvania Office of Consumer Advocate
555 Walnut Street 5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923
Attn: Darryl A. Lawrence, Consumer Advocate

Pennsylvania Office of Small Business Advocate
555 Walnut Street
1st Floor Forum Place
Harrisburg, Pennsylvania 17101
Attn: NazAarah Sabree, Small Business Advocate

Federal Agencies

U.S. Army Corps of Engineers
Baltimore District Corporate Communication Office
2 Hopkins Plaza
Baltimore, Maryland 21201
Attn: Planning Division

U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Road, Suite 101
State College, Pennsylvania 16801
Attn: Jodie Mamuscia, Field Office Supervisor

County Agencies

Luzerne County Planning Commission
200 North River Street
Wilkes-Barre, Pennsylvania 18711
Attn: N. Brian Caverly, Chair

Luzerne County Conservation District
325 Smiths Pond Road
Shavertown, Pennsylvania 18708
Attn: John (Jay) Wilkes, Chairman and Public Director

Municipalities

Hazle Township
P.O. Box 506,
Harleigh, PA 18225

Landowners

NP Hazleton Holdings 1, LLC
3315 North Oak Trafficway,
Kansas City, Missouri 64116

VERIFICATION

I, JOSEPH B. LOOKUP, being the Vice President – Transmission & Distribution Planning and Asset Management at PPL Services Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation 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: December 19, 2025

Joseph B. Lookup

WITNESS: Joseph Lookup

PPL Electric Utilities Corporation
Response to the On-The-Record Data Request Made by the
Office of Consumer Advocate (OCA)
At the Evidentiary Hearing Held September 17, 2026
Docket No. A-2025-3059443

On-the-Record Data Request

a. Identify the specific provisions of Customer No. 1's Electric Service Agreement, which was provided in discovery as a HIGHLY CONFIDENTIAL OCA I-1 Attachment 1, which obligate PPL Electric to not provide service to the customer above the Phase 1 scope projected load if the Phase 2 facilities are not approved and constructed.

b. Identify the specific provisions of Customer No. 1's Electric Service Agreement, which was provided in discovery as a HIGHLY CONFIDENTIAL OCA I-1 Attachment 1, which obligate PPL Electric to not provide service to the customer to the extent that the customer's load exceeds 400 MW unless and until the Phase 2 facilities are approved and constructed.

PPL Electric Response

a-b. Please refer to the following provisions of HIGHLY CONFIDENTIAL OCA I-1 Attachment 1:

- Section 1, which provides that the electric service provided is conditioned on construction work being completed.
- Section 9, which provides that customer must cooperate by following reliability orders, and outage orders in accordance with the tariff
- Section 14, which provides that the customer is subject to the terms and conditions of PPL Electric's Tariff and applicable law.
- Section 25, which provides that in the case of a conflict between the Electric Service Agreement and PPL Electric's Tariff, the Tariff controls.
- Schedule D, which provides that the Phase II work is within the scope of work.

  Also reference PPL Electric Tariff Rule 5 A, which provides that customers cannot operate equipment in a way that damages the Company's system.

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 1

DIRECT TESTIMONY OF JOSEPH LOOKUP

TOPICS ADDRESSED: **GENERAL DESCRIPTION OF PROJECT**
NEED FOR PROJECT

DATE: MAY 13, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Joseph Lookup, and my business address is 827 Hausman Road, Allentown, Pennsylvania 18104.

Q. By whom are you employed and in what capacity?

A. I am employed by PPL Services Corporation as Vice President – Transmission and Distribution Planning and Asset Management and provide services to PPL Electric Utilities Corporation ("PPL Electric" or the "Company").

Q. What are your current responsibilities?

A. I oversee the Transmission Planning, Asset Strategy, Portfolio Management, Project Development, Real Estate, Project Management and Construction Management Groups. This includes responsibility for transmission system reliability, investment strategy and project execution.

Q. Please describe your professional experience.

A. Prior to working at PPL Electric, I worked as a consultant providing engineering, project management, construction management services for utility, industrial, commercial, and educational clients. At PPL Electric I have worked in Engineering, Project and Construction Management, and Asset Management in various engineering and project leadership, and management roles.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to generally explain the Letter of Notification ("LON") requesting the Pennsylvania Public Utility Commission's ("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 &#2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard (the "Project"). 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 are located in Hazle Township, Luzerne County, Pennsylvania. I will explain why the Project is necessary or proper for the service, accommodation, convenience, or safety of the public. More specifically, I will summarize the information detailed in the above-captioned LON and associated **Attachment 1 – Necessity Statement**, **Attachment 2 – Engineering Description**, and **Attachment 4 – Design Criteria and Safety**.

Q. Are you responsible for the preparation of any of the Attachments filed with the above-captioned LON?

A. Yes. The above-mentioned Attachments to the LON were prepared by me or under my supervision. In addition, I verified the contents of the LON filed by the Company at the above-captioned docket.

II. <u>NEED FOR THE PROJECT</u>

Q. Please describe the existing system relevant to this Project.

A. PJM Interconnection, LLC ("PJM") operates and coordinates an extensive 500 kV and 230 kV Bulk Electric System ("BES") that is owned by multiple utilities through all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and the District of Columbia. The BES allows for regional transfer of power to supply load throughout the PJM Area.

The existing Susquehanna-Harwood #1 and #2 230 kV Transmission Lines are part of PPL Electric's BES. These transmission lines transfer power from the Susquehanna 230 kV Switchyard to the Harwood 230-69 kV Substation, the East Palmerton 230-69 kV Substation, and the Siegfried 230-138-69 kV Substation. These lines are heavily loaded and have a history of transmission congestion. A one-line diagram of the existing system configuration is provided as **Figure 1-1** to **Attachment 1 – Necessity Statement**.

Q. Why is the Project needed?

A. The Project is required to comply with PPL Electric's obligation to provide non-discriminatory service to a customer facility at 69 kV or above, and PPL Electric's general right and obligation to serve customers in its service territory, subject to the terms and conditions of its tariffs and certificate of public convenience.

Specifically, one new customer ("Customer"), located in Hazle Township, has requested 230 kV electrical service with an in-service date of March 2027, at an initial load of 12 megawatts ("MW"). These numbers have been updated since the Letter of Notification was originally filed in December 2025, which indicated an in-service date of December 2026 and an initial load of 240 MW. The Customer's load will increase in stages to approximately 276 MW by December 2027, and to approximately 965 MW by 2033.

This Customer will be served by the proposed Tomhicken Switchyard, which bifurcates the Susquehanna-Harwood #1 and #2 230 kV Transmission Lines to create the Susquehanna-Tomhicken #1 and #2 and the Tomhicken-Harwood #1 and #2 230 kV Transmission Lines.

While the Project will immediately serve the Customer, the Company also anticipates that the Project will eventually facilitate service to multiple customers, due to multiple customer requests. A second phase of the Project, which is the subject of a Full Siting Application, filed on April 6, 2026, at Docket No. A-2026-3061547, will be needed to address the Customer's future electrical needs and demands, as well as the needs and demands of future customers and PPL Electric's system needs.

The projected load growth will create overloads on the Susquehanna-Tomhicken #1 and #2 230 kV Transmission Lines, which will require additional improvements to the 230 kV network in this area to continue to provide reliable service.

Specifically, the Susquehanna-Tomhicken #1 and #2 230 kV Transmission Lines become overloaded when the load increases by approximately 400 MW in the Hazleton area. The loss of one of the Susquehanna-Tomhicken 230 kV lines in a single contingency (P1)[1] or multiple contingency with a fault plus stuck breaker[2] (P4) category overloads the remaining in-service line. When the load addition in the Hazleton area approaches approximately 700 MW, the loss of both Susquehanna-Tomhicken #1 and #2 230 kV Transmission Lines for a multiple contingency with the common structure (P7) category

[1] P1, P4 and P7 are category contingencies defined in Table 1 of the NERC TPL-001 Transmission System Planning Performance Requirements. https://www.nerc.com/globalassets/standards/reliability-standards/tpl/tpl-001-5.1.pdf

[2] A stuck breaker means that for a gang-operated breaker, all three phases of the breaker have remained closed. For an independent pole operated (IPO) or an independent pole tripping (IPT) breaker, only one pole is assumed to remain closed. A stuck breaker results in Delayed Fault Clearing.

results in voltage violations at both the Tomhicken Switchyard and the Harwood Substation.

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.

Q. What would happen if the projected load growth does not materialize?

A. It depends on the timing of the customer projects being cancelled. If it is prior to PPL Electric's construction of the Project being completed, the Company would halt development activities and the customers that have requested interconnection would be responsible for the costs that PPL Electric incurred to that point. If it is after the Project has been constructed, the Company would rely on its security protections in each of its Electric Service Agreement with the customers that requested interconnection. This would require the customer to pay the entire cost of the upgrades placed into transmission rates. The Company would credit its transmission rate base, effectively removing these costs from rates, and protecting other customers from stranded asset risk.

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.

Q. Would the Company inform the parties to this case if it was no longer pursuing the Project?

A. Yes, if the Company stops development of the Project it will inform the parties to this case.

III. OVERVIEW OF THE PROJECT

Q. Please summarize the proposed Project.

A. As proposed, the project involves the construction of the new Tomhicken 230 kV Switchyard, which will be a new breaker-and-a-half 230 kV switchyard, and extend four 230 kV lines to the Customer's substation. The Tomhicken Switchyard will be constructed in a breaker-and-a-half arrangement, which is the preferred design under PPL Electric's design criteria, because of its optimal balance of operational flexibility and cost. PPL Electric will construct the Tomhicken Switchyard on the same Customer-owned parcel as the Customer's 230-34 kV substation and facilities, and the Company will acquire the

necessary land and right-of-way ("ROW") from the Customer for the new Tomhicken Switchyard, Tap Lines, and Connecting Lines.

This solution (the "Proposed Solution"), will allow the Company to split the transmission lines on the Customer-owned parcel and extend them to the Tomhicken Switchyard, thereby reducing impacts to adjacent landowners and the surrounding environment, by limiting the amount of new transmission line construction necessary to connect the Tomhicken Switchyard to the electric grid.

A detailed engineering description is provided in **Attachment 2 – Engineering Statement**.

Q. What is the estimated cost of the Project?

A. The total estimated cost of the proposed Project is $59.9 million. The Customer is responsible for approximately $21.5 million, and PPL Electric is responsible for approximately $38.4 million. However, the new load customer is providing a minimum load guarantee ensuring that the Company will receive transmission rate revenue at least equal to the amount of the cost of the Project. This security obligation also requires the Customer to pay for any transmission costs folded into the Company's transmission rate base, in the event that the Project does not go forward, or terminates early.

Q. When is construction of the Project scheduled to begin?

A. Construction of the Project is scheduled to begin in August 2026, subject to the Commission's approval. However, the Company will be prepared to begin construction soon after a Commission approval if the approval occurs after August 2026.

Q. What is the in-service date for the proposed Project?

A. The anticipated in-service date is approximately 9-10 months after the Commission's approval.

IV. DESIGN DESCRIPRTION AND SAFETY PRACTICES

Q. Please describe the design of the proposed construction of the Project.

A. The Project involves the removal of the existing Susquehanna-Harwood 230 kV Transmission Line, the construction by PPL Electric of the new Tomhicken 230 kV Switchyard, as well as the construction of four double-circuit, 230 kV transmission Tap Lines which will measure approximately 1.1 miles in length in total, and two new 0.1-mile-long 230 kV Connecting Lines from the Tomhicken Switchyard to a new 230-34 kV substation which will be owned by the Customer. The Project fits entirely within property owned either by the Customer or by PPL Electric, and all necessary easements and land rights have been acquired and finalized.

The Susquehanna-Harwood 230 kV Transmission Line to be removed consists of three double-circuit steel lattice tower structures ranging in height from 130-133 feet, and two optical ground wires ("OPGW"). The new Tap Lines and Connecting Lines involve the installation of 13 new monopole structures, ranging in height from 100-140 feet. The new lines will be double-circuit and will have two OPGWs. A more detailed engineering description is provided in **Attachment 2 – Engineering Statement**.

Q. Will the proposed Project create any unreasonable risk of danger to the public health or safety?

A. No. The proposed lines will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code ("NESC") minimum standards and all applicable legal requirements. Descriptions of the NESC standards, PPL Electric's design criteria, and PPL Electric's safety practices are provided in **Attachment 4 - Design Criteria and Safety**.

Q. Does the LON explain how PPL Electric manages magnetic fields?

A. Yes. **Attachment 4 – Design Criteria and Safety** and explain PPL Electric's standards for Magnetic Field Management.

V. CONCLUSION

Q. Does this conclude your Direct Testimony at this time?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 2

DIRECT TESTIMONY OF KYLE SWARTZENTRUBER

TOPICS ADDRESSED: ENGINEERING AND DESIGN CRITERIA

SAFETY CONSIDERATIONS

DATE: MAY 13, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Kyle Swartzentruber. My business address is 827 Hausman Rd Allentown, PA 18104.

Q. By whom are you employed and in what capacity?

A. I am employed by PPL Services Corporation as a Lead Responsible Engineer and provide services to PPL Electric Utilities Corporation ("PPL Electric" or "Company").

Q. What are your current responsibilities?

A. I assist with and oversee the design of transmission line projects, including the project that is the subject of the above-captioned Letter of Notification ("LON"). This includes specifying and ordering materials, pole placement and spotting, and the design of the transmission voltage facilities.

Q. Please provide your educational background.

A. I have a Bachelors of Science Degree in Mechanical Engineering Technology from The Pennsylvania State University.

Q. Please describe your professional experience.

A. I have been employed with PPL Electric since 2011 and performed Transmission Line Design the entire time. Prior to that I was a Test Engineer for Mack Trucks

Inc, a draftsman for East Penn Manufacturing, and a design Engineer for Zeks Air Drawing Systems.

Q. What is the purpose of your direct testimony?

A. The purpose of my testimony is to summarize and detail the engineering and design criteria utilized for the Company's proposal 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 &#2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard and to construct 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 "Project"). I will also discuss the safety considerations for the Project.

Q. Please describe the portions of the LON that you are sponsoring.

A. I am responsible for describing the engineering and design criteria, as well as safety considerations, for the Project. Specific to the LON, I am responsible or partly responsible for **Attachment 2 – Engineering Description** and **Attachment 4 – Design Criteria and Safety**.

II. <u>OVERVIEW OF ENGINEERING AND DESIGN CONSIDERATIONS</u>

Q. Could you provide a brief explanation of the engineering and design considerations for the Project?

A. Yes. The Project is designed to comply with PPL Electric's obligation to provide service to customers upon a request subject to reasonable terms and conditions and,

more specifically, to serve the request of one new customer ("Customer") located in Hazle Township, which has requested 230 kV electric service at an initial load of 240 megawatts ("MW"), as described in further detail by Joseph Lookup in PPL Electric Statement No. 1, as well as the various items addressed in **Attachment 1 – Necessity Statement** to the LON.

PPL Electric's new and rebuilt transmission lines as part of the Project will be designed according to, and generally exceed, all National Electric Safety Code ("NESC") minimum standards. The NESC standards are developed to safeguard utility workers and the public during the installation, operation, and maintenance of electric power lines. Although not intended as a design specification, its provisions establish minimum design requirements. The NESC is a safety code that includes loading requirements and clearances for the design, construction, and operation of power lines. Loading requirements are the loads on the conductors and structures that are anticipated, assuming certain ice and wind conditions. Loading requirements always contain "safety factors" to allow for unknown or unanticipated contingencies. The clearances and loading requirements contained in the NESC are designed to maintain public safety. PPL Electric's transmission line design standards meet or surpass the NESC clearances and loading requirements.

For example, the NESC specifies strength and loading rules based on three different "grades of construction" for conductors and supporting structures:

Grade B – This grade of construction provides the highest margin of safety and is required when the pole supports spans that cross limited access highways, railroads, and waterways.

Grade C – This grade of construction is most common and provides a basic margin of safety. It is often utilized for the typical power and joint-use distribution pole.

Grade N – This is the lowest grade of construction and is most often used for emergency and temporary construction.

PPL Electric designs all of its transmission lines for Grade B construction. The use of Grade B design and construction translates to higher levels of structural reliability and safety to withstand the environmental conditions of ice and/or wind loading.

PPL Electric's transmission lines are designed to exceed NESC requirements by accounting for additional ice and wind loading conditions not contemplated under the NESC. This means that PPL Electric's lines are designed to operate safely and reliably during extreme inclement weather. In addition, where practicable, PPL Electric's transmission lines are designed with more clearance to the ground than required by the NESC.

PPL Electric also uses a relay protection system to protect the public safety, as well as the equipment on the transmission system. Relay protection is installed for all transmission lines and is designed to automatically de-energize a line in the unlikely event that the line or supporting structure fails and the line contacts the ground.

Q. Could you provide further details as to the specific design and engineering for the Project?

A. Yes. The Project involves the removal of the existing Susquehanna-Harwood 230 kV Transmission Line, the construction by PPL Electric of the new Tomhicken 230 kV Switchyard, as well as the construction of four double-circuit, 230 kV transmission Tap Lines which will measure approximately 1.1 miles in length in total, and two new 0.1-mile-long 230 kV Connecting Lines from the Tomhicken Switchyard to a new 230-34 kV substation which will be owned by the Customer.

The Susquehanna-Harwood 230 kV Transmission Line to be removed consists of three double-circuit steel lattice tower structures ranging in height from 130-133 feet, and two optical ground wires ("OPGW"). The new Tap Lines and Connecting Lines involve the installation of 13 new monopole structures, ranging in height from 100-140 feet. The new lines will be double-circuit and will have two OPGWs. All structures will comply with NESC and PPL Electrical clearance requirements.

A more detailed engineering description is provided in **Attachment 2 – Engineering Statement**.

Q. Could you generally describe the periodic maintenance PPL Electric employs for all of its Transmission Lines, including the new and/or rebuilt Transmission Lines for the subject Project?

A. Yes. To ensure continued public safety and integrity of service, PPL Electric has

implemented a periodic maintenance and inspection program for every transmission line. The program is administered using helicopter patrols, with supplemental foot patrols, as needed. Helicopter patrols are performed on all lines on a predetermined frequency, depending on voltage level. The two-man helicopter crew flies parallel and above the line so that the observer can look for signs of line damage or deterioration and observe clearances between vegetation and conductors. The observations are included in a report that is forwarded to the appropriate department for corrective action.

III. SAFETY CONSIDERATIONS

Q. Please provide an overview of PPL Electric's safety considerations for the Project.

A. PPL Electric designs and constructs its projects with a high appreciation for the safety of the public and its employees and meets or exceeds all applicable codes and requirements. The following are examples of the PPL Electric safety rules that illustrate the Company's dedication to employee and contractor safety:

- Work procedures have been developed to facilitate the safe performance of work on energized facilities. Any timelines or equipment is removed from service for repair or maintenance, an Energy Control Process system is applied. This system requires that a red tag be physically placed on the control handle of all de-energized equipment.
- The red tag may be removed only after proper authorization to re-energize the equipment has been received.

- Various other tags are used for limited operations and informational purposes.
- Only authorized employees and contractors can apply or remove a tag or change the status of tagged equipment.
- Temporary safety grounds are used on de-energized facilities to promote employee safety during maintenance, construction, or reconstruction work. Safety grounds are wires that connect a de-energized facility to an electrical ground. If the facility should be unintentionally energized, the safety grounds will reduce the likelihood of personal injury but diverting the current directly to ground.
- Lines are tested to confirm de-energization before applying safety grounds using a voltage testing device to assure reliability.
- Poles and structures are inspected and examined for structural integrity before climbing. If there is any reason to believe that a pole is unsafe, it is stabilized before any work is performed. Appropriate safety gear in the form of body belts, safety straps, hard hats, gloves, etc., is always worn by linemen during line work activity.

Q. Did PPL Electric consider Magnetic Fields as part of the review of the Project?

A. Yes. PPL Electric's Magnetic Field Management Program is applied to new and reconstructed transmission line projects. The Company does not believe that current scientific evidence demonstrates that magnetic fields cause any adverse health effects or pose a health or safety danger to the public. Nevertheless, PPL

Electric has determined, as a matter of policy, to design its new and rebuilt transmission lines to reduce magnetic fields when consistent with functional requirements. The program generally prescribes the use of a line design with ground clearance that exceeds NESC standards by a minimum of 5 feet and reverse phasing of new double-circuit lines where feasible and can be implemented at low or no additional cost.

Further information on PPL Electric's Magnetic Field Management Plan can be found in **Attachment 4 – Design Criteria and Safety**.

IV. CONCLUSION

Q. Does this conclude your direct testimony?

A. Yes, it does. If necessary, I will supplement my testimony if and as additional issues arise during the course of this proceeding.

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 3

DIRECT TESTIMONY OF PETER SPARHAWK

TOPICS ADDRESSED: **PROPOSED ROUTE**
ENVIRONMENTAL ASSESSMENT AND MITIGATION

DATE: MAY 13, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Peter Sparhawk. My business address is 350 Eagleview Boulevard, Suite 250, Exton, PA 19341.

Q. By whom are you employed and in what capacity?

A. I am employed by WSP USA ("WSP") as Senior Vice President, T&D Market Sector Lead, Earth & Environment.

Q. What are your principal responsibilities in this position?

A. My responsibilities include managing, coordinating, and providing senior review for a variety of environmental assessment, regulatory, and compliance projects and tasks for electric transmission projects. These projects include leading and participating in siting and routing studies, feasibility studies, compliance with state and federal regulatory processes, state filings before public utility commissions (including the Pennsylvania Public Utility Commission), environmental permitting projects, and similar environmental and planning assignments.

Q. Please provide a summary of your education and professional work experience.

A. I graduated from Cornell University in Ithaca, New York in 1985 with a Bachelor of Arts degree in History. I also completed a Certificate Program for the Environmental Manager in 1996 at the University of Washington. I have over 35 years of experience in preparing, coordinating, and managing environmental, infrastructure, and energy projects, including federal and state environmental impact statements and assessments, environmental

compliance and permitting efforts, and state certification applications for transmission line projects. My experience with energy projects includes licensing and permitting for electric transmission lines, gas-fired generation, wind power, and hydroelectric facilities, with the past 18 years dedicated primarily to electric transmission and substation projects. I have conducted and overseen numerous environmental analyses and coordinated license applications to state energy agencies and siting boards for power facilities and infrastructure in various states throughout the United States, including many in Pennsylvania. Specifically, my electric transmission line experience includes routing and siting, licensing, public outreach, permitting, consultation with resource agencies, expert witness testimony before the Pennsylvania Public Utility Commission ("PUC" or the "Commission") and the New Jersey Board of Public Utilities, participation in and tracking of transmission planning efforts within various Independent System Operators and Regional Transmission Organizations – including PJM Interconnection ("PJM") – and everyday coordination with WSP utility clients and programs. I have been responsible for helping PPL Electric Utilities Corporation ("PPL Electric" or the "Company") prepare various attachments and analyses for inclusion in full siting applications or letters of notification to the PUC for 37 electric transmission line projects since 2008.

Q. What is the purpose of your direct testimony in this proceeding?

A. My testimony provides a summary of the proposed route for construction of 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 &#2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard, as well as two new 0.1-mile-long 230 kV

transmission lines ("Connecting Lines") from the Tomhicken Switchyard to a new customer-owned 230-34 kV substation (the "Project"). The environmental study activities described in **Attachment 3 – Description of Project Area** were performed by Verdantas, another vendor of the Company, and in coordination with PPL Electric.

Q. Were any portions of the siting study prepared by you or under your supervision?

A. Yes. I am sponsoring certain attachments to PPL Electric's Letter of Notification. Specifically, I am responsible for portions of the following attachments to the LON:

- **Attachment 3 – Description of Project Area**

I was involved in preparing this attachment to the LON or otherwise provided oversight to WSP technical staff who prepared them.

Q. Please provide an overview of the Project.

A. As explained in the written direct testimony of Company witness Joseph Lookup (PPL Electric Statement No. 1), and Kyle Swartzentruber (PPL Electric Statement No. 2), the Project is required to comply with PPL Electric's obligation to provide non-discriminatory service to a customer facility at 69 kV or above, and PPL Electric's general right and obligation to serve customers in its service territory, subject to the terms and conditions of its tariffs and certificate of public convenience. The Project is immediately needed to provide one new requesting customer (the "Customer"), located in Hazle Township, with 230 kV electrical service at an initial load of 240 megawatts ("MW"), with an in-service date of December 15, 2026.

To address these transmission needs, PPL Electric will remove the existing Susquehanna-Harwood 230 kV Transmission Line, construct the new Tomhicken 230 kV

Switchyard, four double-circuit, 230 kV transmission Tap Lines which will measure approximately 1.1 miles in length in total, and two new 0.1-mile-long 230 kV Connecting Lines from the Tomhicken Switchyard to a new 230-34 kV substation which will be owned by the Customer.

II. OVERVIEW OF THE SITING PROCESS

Q. Please provide an overview of the siting process and explain how the study area was determined, and how the potential and alternative routes were developed.

A. Unlike many applications before the Commission, the Project involves the construction of a new transmission line which is proposed to be located entirely within PPL Electric's existing transmission line right-of-way ("ROW") and on the property of the sole customer to be served by the line. As explained in **Attachment 3 – Description of Project Area**, the Project, as proposed ("Proposed Route") is located entirely on property owned by either PPL Electric or by the Customer.

Q. Why is this distinction important?

A. As explained in **Attachment 1 – Necessity Statement**, the feasible alternative to the Project would involve the construction of two new greenfield double-circuit 230 kV transmission lines, as well as the expansion of the existing Harwood 230 kV Substation, requiring the relocation of the existing 230 kV capacitor. Not only would this alternative limit the ability of PPL Electric to accommodate future load growth in the Hazleton area by building out all but one line position at the Harwood Substation, but it would also require PPL Electric to acquire new ROW for project construction and operation, necessitating

more disruption to landowners and the surrounding environment than the Proposed Route, which will be located entirely on land owned either by PPL Electric or by the Customer.

Q. Even though PPL Electric has not prepared a formal siting and routing study in this proceeding, did it analyze the Project and consider whether the subject HV transmission lines (1) are in compliance with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth, and (2) will have minimum adverse environmental impact, considering the electric power needs of the public, the state of available technology, and the available alternatives?

A. Yes. **Attachment 3 – Description of Project Area** describes the review conducted by PPL Electric to ensure that the HV transmission lines that are the subject of the Project are (1) in compliance with applicable statutes and regulations providing for the protection of the natural resources of this Commonwealth, and (2) will have minimum adverse environmental impact, considering the electric power needs of the public, the state of available technology, and the available alternatives. I will discuss how each of these criteria was satisfied by PPL Electric below.

Q. Even though PPL Electric has not prepared a formal siting and routing study in this proceeding, was public outreach part of the process for establishing the Proposed Route?

A. Yes. Agency and public outreach is an important component of the siting and construction process. PPL Electric conducted public outreach, including regulatory agency consultation

and public notifications. PPL Electric consulted with various federal, state, and local agencies to inform them of the Project and request data used in the route planning process.

Q. Did PPL Electric consider local comprehensive plans and zoning in selecting the proposed route for the Project?

A. Yes. As required by the PUC's guidelines found at 52 Pa. Code, § 69.1101 (2)(3) and § 69.3104 (1), local zoning ordinances and comprehensive land use plans were reviewed by PPL Electric to evaluate the impact of the proposed Project. PPL Electric evaluated the Project's consistency with the zoning ordinances and comprehensive plans of Hazle Township in Luzerne County, Pennsylvania.

III. COMPLIANCE WITH POTENTIAL PERMIT AND MITIGATION REQUIREMENTS

Q. Please summarize PPL Electric's efforts to minimize the anticipated impacts and potential permit and mitigation requirements of the Project.

A. Efforts were made during the transmission line siting process to minimize impacts on existing and future land uses, as well as avoid sensitive natural resources such as wetlands and streams.

As I noted earlier, the Project is located on property owned by PPL Electric or by the Customer. The Tomhicken Switchyard will be colocated with the Customer-owned substation. The Tap Lines will be located partially within existing PPL Electric fee-owned property and within approximately 11 acres of 150-foot-wide ROW located on the Customer's Property, which the Customer will be required to and has agreed to grant to PPL Electric. The Project requires the installation of 13 new structures, which will be

constructed on properties owned by either PPL Electric or the Customer. Where existing access roads cannot be utilized during construction, new access roads will be constructed and located within the 150-foot-wide ROW.

A detailed discussion of the Company's efforts to minimize the anticipated impacts and potential permit and mitigation requirements of the proposed Project is provided in **Attachment 3 – Description of Project Area** to the LON. Anticipated agency requirements and permits are also provided in **Attachment 3**.

IV. THE PROPOSED HV TRANSMISSION LINE WILL HAVE MINIMUM ADVERSE ENVIRONMENTAL IMPACTS

Q. Please summarize PPL Electric's review of the Project Area.

A. From the existing Susquehanna Substation, the Susquehanna-Tomhicken #1 & #2 230 kV Transmission Lines travel south towards the proposed Tomhicken Switchyard. From the existing Harwood Substation, the Tomhicken-Harwood #1 & #2 230 kV Transmission Lines travel north towards the Proposed Tomhicken Switchyard. From the Proposed Tomhicken Switchyard, the Connecting Lines travel east approximately 0.1 mile to the proposed Customer-owned substation. The area reviewed encompassed land uses, natural resources and cultural resources on PPL Electric and on Customer-owned properties within the existing ROW and within 0.25 mile of the Project centerline ("Project Area").

Q. Please describe the existing land uses in areas traversed by the Project.

A. Land use in the Project Area is 90% forest and 10% existing utility ROW, as associated with the existing Susquehanna-Harwood #1 &#2 230 kV Transmission Lines. Land uses

immediately surrounding the Project Area predominantly consist of vacant forested land or developed residential land.

Q. Does the Project traverse any State-owned and/or conserved lands?

A. No.

Q. Are there any airports located near the Project?

A. No. The closest active airport relative to the Project Area is the Hazleton Regional Airport, located approximately 3.8 miles northeast of the Project. Additionally, the Lehigh Valley Hospital Heliport is located approximately 5 miles southeast of the Project. The Company does not anticipate any interference with airport or heliport operations. However, PPL Electric will file any required documentation with the Federal Aviation Administration.

Q. Please describe the cultural resources that are located within the Project Area.

A. There is one eligible district resource located within 1 mile of the Project Area: the Lehigh Valley Railroad. This is an abandoned railroad, located approximately 0.4 miles north of the Project Area, traversing in a general east-west direction, and is not crossed or spanned by the Project. Thus, PPL Electric anticipates no impact to the railroad.

Q. Please describe the natural features located within the Project Area.

A. Environmental factors reviewed for the Project included unique natural features, soils, waterways, wetlands, 100-year floodplains, vegetation, and threatened and endangered species.

No unique geological, scenic, or natural areas are crossed by the Project. A Natural Area Inventory ("NAI") prepared by the Pennsylvania Natural Heritage Program indicates that the Humbold Barren area is an exceptional-rated natural heritage area, located approximately 1,000 feet south/southeast of the Project. However, the Project does not cross the natural areas with supporting habitat identified within the NAI.

Soils within the Project Area are predominantly silty and sandy loams, with slopes ranging from 3 to 25 percent. Erosion and Sediment Control plans will be developed and implemented for the Project, which will require prior approval from the Luzerne County Conservation District.

One freshwater emergent wetland and one unnamed tributary ("UNT") flowing north to Black Creek will be crossed by the Project, but neither is anticipated to be impacted during construction. These features are located on the Customer's property which is proposed for future PPL Electric ownership. The Project crosses no FEMA 100-year floodplains, nor FEMA regulatory floodways. Vegetation clearing will need to occur on the site for the new Tomhicken Switchyard and Customer-owned substation, as the site is located in an undeveloped wooded area.

Q. Are there any threatened and/or endangered species that may be encountered within and along the Project Area?

A. Review of the threatened and endangered species that may be encountered within and along the Project includes evaluation of the natural areas identified in the Project area, as well as the Project-related Pennsylvania Natural Diversity Inventory ("PNDI") responses provided

by federal and state agencies that have protective jurisdiction over the surrounding animals, plants, and ecological communities.

Based on a detailed PNDI review, the PA Department of Conservation and Natural Resources ("DCNR") determined potential impacts to the following: variable sedge, fall dropseed muhly, yellow-fringed orchid, lupine, screw-stem, Hartford fern, rough-leaved aster, white-fringed orchid, herbaceous vernal pond, hemlock-mixed hardwood palustrine forest, and pitch pine – rhodora – scrub oak woodland. The DCNR requested that a botanical survey be completed for the above-listed species, and that a Wild Plant Management Permit by obtained before botanical surveys occur. The Pennsylvania Game Commission deferred comments to the U.S. Fish and Wildlife Service and the Pennsylvania Fish & Boat Commission reported no known impacts within the Project Area. The USFWS determined potential impacts to suitable bat habitat, but after further investigation was performed, it was determined that tree clearing associated with the Project would not impact potential roosting sites or hibernacula.

Q. Given your analysis and review of these features, the fact that the Project utilizes existing HV transmission line ROW and Customer-owned property, and the fact that PPL Electric has committed to obtaining all necessary permits and implementing appropriate mitigation where needed, what do you conclude regarding the environmental impacts of the Project?

A. The Project will have minimal adverse environmental impacts when compared to any alternative that would require building new transmission lines where none presently exist. Efforts were made during the transmission line siting process to minimize impacts on

existing and future land uses, as well as avoid sensitive natural resources such as wetlands and streams. Where impacts are unavoidable, best management practices will be employed and PPL Electric will obtain and comply with any necessary permits. The Siting Team ultimately decided that the cumulative environmental, engineering and constructability, and social and financial impacts associated with constructing the HV lines proposed here are more favorable when compared to building new transmission lines not presently existing.

V. CONCLUSION

Q. Does this conclude your testimony at this time?

A. Yes, it does. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 4

DIRECT TESTIMONY OF AUSTIN WESELOH

TOPICS ADDRESSED: RIGHT-OF-WAY AND EASEMENT RIGHTS

DATE: MAY 13, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Austin K. Weseloh. My business address is 827 Hausman Road, Allentown, Pennsylvania 18104.

Q. By whom are you employed and in what capacity?

A. I am employed by PPL Services Corporation as Transmission Right of Way and Real Estate Supervisor. In this position, my primary responsibility is to supervise all Transmission Right of Way ("ROW") and Real Estate assets for PPL Service Corporation in service to PPL Electric Utilities Corporation ("PPL Electric" or the "Company").

Q. What is your educational background?

A. I attended the University of Pittsburgh for three years, majoring in Economics.

Q. Are you a member of any professional organizations?

A. Yes. I am currently a member of the International Right of Way Association ("IRWA") where I am taking classes to attain the Senior Right of Way Agent ("SR/WA") certification which is the highest-level industry designation. The certification requires course work consisting of both core courses and elective courses. The certification requires satisfactory completion of the certification test administered by the IRWA.

Q. Please describe your background and employment history.

A. I have been employed by PPL Electric in my current position as Transmission Right of Way and Real Estate Supervisor for approximately seven years. Prior to that, I was a Senior Right of Way Specialist at PPL Electric for three and a half years.

- From 2012 through 2013 I worked as a Right of Way Agent for Doyle Land Services negotiating the acquisition of ROW grants, access roads, property damages and real estate contracts to add a 60-mile pipe adjacent to an existing ROW in Pennsylvania.
- From 2011 through 2012 I worked as a Right of Way Agent for Meridian Land Group negotiating the acquisition of ROW grants, access roads and property damages for 75 miles of new pipeline ROW to connect 69 new natural gas wells in Northeast Pennsylvania.
- From 2010 through 2011 I worked as a Right of Way Agent for Miller Land Professionals reviewing title for potential natural gas leases and ROWs in Bradford and Susquehanna Counties, Pennsylvania.

From 2004 through 2010 I worked for LTS Builders and Realty Company purchasing land for new home construction. My duties included negotiating for individual lots as well as large tracts to be subdivided into developments.

Q. What are your responsibilities in connection with the proposed Project?

A. The Project as described by Joseph Lookup in PPL Electric Statement No. 1, and in **Attachment 1 – Necessity Statement** involves the construction of 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 &#2 230 kV Transmission Lines to the new Tomhicken 230 kV Switchyard (the "Project"). 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 Project requires the acquisition of additional right-of-way ("ROW") to accommodate the construction of the new transmission lines. More specifically, the Company is planning to acquire land from the requesting customer ("Customer") on which to construct the new Tomhicken Switchyard, Tap Lines, and Connecting Lines. All necessary easements and land rights necessary for the construction of the Tap Lines and Connecting Lines have been finalized. These were all located on Customer-owned property. As of the date of this testimony, the agreement of sale for the land on which the Tomhicken Switchyard will be built has not yet been finalized, however, the Company does not anticipate any issues will arise in the finalization of this agreement.

Q. What are the subjects of your testimony?

A. First, I will identify the portions of the above-captioned Letter of Notification ("LON") that I am sponsoring. Second, I will summarize our process for identifying new ROW required for the Project and the property owners that would be affected. Third, I will explain the process we employed to attempt to acquire rights of way and easements for the Project. Fourth, I will explain the Company's policy regarding the property owner's use of the ROW area and will provide examples of measures the Company employs to mitigate the impacts of the Transmission Lines on property owners' present and future uses of their

properties. Fifth, I will explain the status of our efforts to acquire the rights-of-way and easements needed for the Project.

Q. Please describe the portions of the Siting Application that you are sponsoring.

A. I am responsible for assisting in the identification of landowners crossed by the proposed project and the ROW acquisition process.

II. RIGHT-OF-WAY IDENTIFICATION AND ACQUISITION

Q. Please describe the Company's process for identifying the owners of property that will be traversed by Project facilities.

A. The Company engaged in discussion and negotiation with the Customer requesting 230 kV level electrical service with an initial load of 240 Megawatts ("MW"), and the Customer has granted the required right-of-way ("ROW") to PPL Electric for the construction of the 230 kV Tap Lines. No additional easements are required for the project.

Q. Please explain the Company's policy regarding the property owner's use of the ROW area.

A. Following the Company's acquisition of a ROW and easement, the property owner can continue to use the ROW area, so long as such use is compatible with the safe and reliable operation and maintenance of Company facilities. Compatible uses that require no prior review or approval from the Company include farming and gardening. The Company also allows compatible development within the ROW area, provided that the design and work in the area does not interfere with the safe and reliable operation and maintenance of

Company facilities. Such uses include grading, installation of roadways or parking lots, and installation of underground infrastructure (such as utilities).

Q. Please explain the status of the Company's efforts to acquire ROW and easements for the Project.

A. The Company acquired all the necessary right-of-way ("ROW") from the customer to build the 1.1 mile transmission line and the 0.1 mile taps. The Company is in final negotiations and has verbal commitment from the customer to acquire the land for the Tomhicken Switchyard and the agreement of sale is imminent.

III. CONCLUSION

Q. Does this conclude your Direct Testimony?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 1-R

REBUTTAL TESTIMONY OF JOSEPH LOOKUP

TOPICS ADDRESSED: **OVERVIEW OF COMPANY REBUTTAL**
SCOPE OF THE PROCEEDING
NECESSITY OF THE PROJECT
COST ALLOCATION AND RELATION TO PHASE 2
PUBLIC OUTREACH AND NOTICE

DATE: AUGUST 7, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Joseph Lookup, and my business address is 827 Hausman Road, Allentown, Pennsylvania 18104.

Q. Did you previously submit testimony in this proceeding on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company")?

A. Yes. On May 13, 2026, I submitted my direct testimony, PPL Electric Statement No. 1, relative to the "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" at Docket No. A-2025-3059443 ("Tomhicken 230 kV Switchyard Project").

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to provide an overview of the Company's rebuttal testimony submitted in this proceeding by myself and other witnesses in support of PPL Electric's proposed Tomhicken 230 kV Switchyard Project. In addition, I will respond to portions of the direct testimony submitted by OCA Witnesses Felder and Konidena related to the appropriate scope of this proceeding, and portions of the direct testimony submitted by Protestants Cook and Zola and public input hearing testimony related to the need for the Project and public notice.

Q. Are you sponsoring any exhibits associated with your rebuttal testimony?

A. Yes. I am sponsoring PPL Electric Exhibit JBL-1R.

II. OVERVIEW OF REBUTTAL TESTIMONY

Q. Could you please provide an overview of the rebuttal testimony being submitted by witnesses on behalf of PPL Electric in this proceeding?

A. Yes. Below is a list of the rebuttal testimony being submitted in support of the proposed Tomhicken 230 kV Switchyard Project:

- PPL Electric Statement No. 2-R – Kyle Swartzentruber – Project Engineering and Design; Health and Safety
- PPL Electric Statement No. 3-R – Peter Sparhawk – Environmental Impact
- PPL Electric Statement No. 4-R – Chad Huber – Right-of-Way ("ROW")
- PPL Electric Statement No. 5-R – John Taylor – FERC and Commission Jurisdiction, Transmission Rates and Cost Allocation, Customer-Specific Investments, Tariff Issues, and Resource Adequacy
- PPL Electric Statement No. 6-R – Bethany Johnson – FERC Transmission Rates

III. SCOPE OF PROCEEDING

Q. OCA Witnesses Felder and Konidena provide substantial testimony regarding the proposed cost allocation of the Tomhicken 230 kV Switchyard Project. Please summarize this testimony.

A. Mr. Felder testifies that there is a "policy gap" between PPL Electric and entities at the federal and state level, including the Federal Energy Regulatory Commission ("FERC"), PJM Interconnection, LLC ("PJM"), and the Pennsylvania Public Utility Commission ("Commission") such that the interconnection of new large loads "without ensuring

appropriate transmission cost allocation" is putting the Company's customers at risk by creating "avoidable cost shifting." (*See*, OCA Statement 1, pp. 7-18.) Mr. Felder recommends that PPL Electric be required to "demonstrate that its transmission cost assignment policies and tariff provisions ensure that non-large load does not pay any of the costs or bear any of the risk of stranded investment due to large loads or propose modifications to its tariff that do so." (OCA Statement 1, p. 29.)

Mr. Konidena recommends that the Commission deny the "proposed" cost allocation of the Project or that, at a minimum, the Commission "require PPL to reallocate to the customer all costs attributable to Phase 2-driven design features and the Breaker and a half switchyard configuration, require PPL to submit its cost allocation policy for formal Commission review and approval, and condition any ratepayer allocation on a quantitative demonstration that ratepayer benefits equal or exceed ratepayer costs." (OCA Statement 2, p. 5.) Mr. Konidena's arguments with respect to these points center around his averment that engineering and design aspects of this Project impact cost allocation. (*See*, OCA Statement 2, pp. 23-25, 40-41.)

Q. Are the testimony and recommendations you summarized in the above question relevant to the scope of the instant proceeding?

A. No.

Q. Why or why not?

A. The instant proceeding is a Letter of Notification ("LON"). This case pertains to PPL Electric's request to site and construct a proposed high-voltage ("HV")_transmission line;

this case does not pertain to an evaluation of the reasonableness or prudency of the costs of the Project, nor to the approval of an allocation of transmission costs between the Customer and other ratepayers. To be clear: PPL Electric has not requested that the Commission make any finding or determination with respect to the reasonableness or prudency of the transmission costs associated with the Project, nor has PPL Electric requested that the Commission make any finding or determination with respect to its proposed allocation of transmission costs between the Customer to be served and PPL Electric's FERC-jurisdictional transmission rate base.

Mr. Felder and Konidena also appear to make observations, arguments, and recommendations based on much broader topics, including: large load policies at the federal, state, and utility level; changes to the Company's tariff; PPL Electric's transmission cost assignment policies; and Phase 2, which is the subject of a separate and ongoing full Siting Application proceeding. (OCA Statement 1, pp. 3, 25, 29; OCA Statement 2, pp. 89-93.) However, as I just stated, the scope of the LON proceeding is limited to the siting and construction of HV transmission lines, and I am of the view that the proceeding should not become a referendum on other siting matters that are subject to FERC jurisdiction or their own, independent Commission review.

Q. What exactly is the approval sought in this proceeding?

A. The Company is seeking approval to build approximately 1.1 miles of new double-circuit 230 kV transmission tap lines, two new 0.1-mile-long 230 kV connecting lines, to interconnect the new Tomhicken 230 kV Switchyard and a Customer-owned substation. The Company is seeking this approval by way of an LON because: the Project is proposed

to be located entirely within PPL Electric's existing transmission line ROW and the property of the sole customer to be served by the line and will not substantially alter the ROW; and the proposed route is less than 2 miles. I am advised by counsel that this is consistent with the Commission's regulations at 52 Pa. Code § 57.72(d)(1)(iii) and (vi).

Q. Please describe your involvement and experience with HV transmission line siting matters before the Commission.

A. In my current role as Vice President – Transmission and Distribution Planning and Asset Management, I oversee the Transmission Planning, Asset Strategy, Portfolio Management, Project Development, Real Estate, Project Management and Construction Management Groups. This includes responsibility of Transmission system reliability, investment strategy and project execution.

Specifically, my responsibilities include overseeing the development, evaluation, routing, siting, permitting, and execution of transmission infrastructure projects throughout PPL Electric's service territory. The groups under my direction are responsible for identifying transmission reliability and load-serving needs, evaluating potential solutions, developing transmission projects, securing the real estate rights necessary for construction, and managing the design and construction of those facilities. As part of these responsibilities, I oversee and provide strategic direction for projects that require approval from the Pennsylvania Public Utility Commission through either Letters of Notification ("LONs") or formal transmission line siting applications. My involvement includes reviewing the need for proposed facilities, evaluating routing and siting considerations, assessing project alternatives, coordinating with engineering, environmental, real estate,

and project development personnel, and supporting the preparation of regulatory filings submitted to the Commission. Through these responsibilities, I have participated in and overseen numerous proceedings involving the siting, relocation, reconstruction, and construction of high-voltage transmission facilities in Pennsylvania. My experience includes projects subject to both the Commission's LON process and formal siting application requirements.

Q. Based upon your experience overseeing PPL Electric's requests for approval to site and construct HV transmission line facilities in Pennsylvania, what is your understanding of the elements of the Project that the Commission will accept evidence upon?

A. It is my understanding that the Commission accepts evidence on four items when considering whether to grant or deny LONs and other siting applications: (1) the need for the proposed line; (2) the safety of the proposed line; (3) the impact of the line on environmental factors including land use, habitats, terrain, landscape, and waterways; and (4) the availability of reasonable alternative routes. I am advised by counsel that these factors are set forth in the Commission's regulations at 52 Pa. Code § 57.75(e). Ultimately, in every HV transmission line siting matter that I have participated in as a witness or overseen on behalf of PPL Electric, it is my experience and understanding that the Commission issues an order that makes the four specific and required findings and determinations set forth in 52 Pa. Code § 57.76(a).

Q. Based upon your experience overseeing PPL Electric's requests for approval to site and construct HV transmission line facilities in Pennsylvania, does the Commission ever make findings or determinations regarding the reasonableness or prudency of the transmission costs associated with the Project, or how those costs may be recovered?

A. That is not my experience. In fact, my experience is the exact opposite. In a number of orders related to HV line projects that I have overseen during my time at PPL Electric (either letters of notification or full siting applications), the Commission regularly includes language in its orders approving LONs noting that its approval does not address the issues of accounting treatment or cost recovery. I am specifically aware of this language being included in the Commission's orders with respect to the following HV transmission line projects where I oversaw the project or participated as a witness:

- Letter of Notification of PPL Electric Utilities Corporation for approval to reconstruct the Elimsport-Lycoming # 2 and # 3 230 kV Transmission Line located in Williamsport Borough and Armstrong and Washington Townships, Lycoming County, Pennsylvania, Docket No. A-2021-3029267, 2022 Pa. PUC LEXIS 73, *8 (Order entered Feb. 24, 2022).

- Letter of Notification of PPL Electric Utilities Corporation for approval to reconstruct the Manor-Millwood 230 kV Transmission Line located in Conestoga, Manor, and Pequea Townships, Lancaster County, Pennsylvania, Docket No. A-2021-3029689, 2022 Pa. PUC LEXIS 101, *8 (Order entered Mar. 10, 2022).

- Letter of Notification of PPL Electric Utilities Corporation for approval to reconstruct a section of the Saegers-Elimsport/Clinton-Elimsport 230 kV Transmission Line and the Saegers-Elimsport/Saegers-Clinton 230 kV Transmission Line located in Brady, Clinton, and Washington Townships, Lycoming County, Pennsylvania, Docket No. A-2022-3034224, 2022 Pa. PUC LEXIS 337, *9 (Order entered Oct. 27, 2022).

- Letter of Notification of PPL Electric Utilities Corporation for approval to reconstruct the South Akron-Millwood 230 kV Transmission Line located in East Lampeter, Pequea, Upper Leacock, West Earl, and West Lampeter Townships, Lancaster County, Pennsylvania, Docket No. A-2022-3034794, 2022 Pa. PUC LEXIS 419, *9 (Order entered Dec. 22, 2022).

- Letter of Notification of PPL Electric Utilities Corporation for approval to reconstruct sections of the Siegfried -- Frackville 230 kV Transmission Line, Eldred -- Frackville 230 kV Transmission Line, and Columbia -- Frackville 230 kV Transmission Line located in Butler Township, Schuylkill County, Pennsylvania, Docket No. A-2023-3040694, 2023 Pa. PUC LEXIS 237, *8 (Order entered Sep. 21, 2023).

- Letter of Notification of PPL Electric Utilities Corporation for approval to reconstruct the Harwood -- East Palmerton 230 kV Transmission Line and Siegfried -- East Palmerton 230 kV Transmission Line located in Jim Thorpe Borough and Banks, Franklin, Lehigh, Lower Towamensing, Packer, Penn Forest, and Towamensing Townships, Carbon County, Hazle Township, Luzerne County, and Allen and Lehigh Townships, Northampton County, Pennsylvania, Docket No. A-2024-3047924, 2024 Pa. PUC LEXIS 175, *10 (Order entered Jun. 13, 2024.)

- Letter of Notification of PPL Electric Utilities Corporation for approval to reconstruct the Fox Hill - Shawnee 230 kV Transmission Line and Shawnee - Bushkill 230 kV Transmission Line located in Smithfield Township, Monroe County, Pennsylvania, Docket No. A-2025-3054291, 2025 Pa. PUC LEXIS 237, *9 (Order entered Jul. 24, 2025).

- Letter of Notification of PPL Electric Utilities Corporation for approval to reconstruct a section of the Frackville - Columbia 230 kV Transmission Line located in Catawissa, Cleveland, Conyngham, Franklin, Hemlock, Locust, Montour, and Roaring Creek Townships, Columbia County, and Butler Township, Schuylkill County, Pennsylvania, Docket No. A-2025-3057843, 2026 Pa. PUC LEXIS 40, *9 (Order entered Feb. 19, 2026).

- Letter of Notification of PPL Electric Utilities Corporation for Approval to Relocate approximately 0.4 miles of the Keystone - Juniata 500 kV Transmission Line and Juniata - Alburtis 500 kV Transmission Line in Centre Township, Perry County, Pennsylvania, Docket No. A-2025-3059384, 2026 Pa. PUC LEXIS 174, *7 (Order entered Jun. 4, 2026).

Q. Why are these findings and determinations relevant to this proceeding?

A. These are relevant because it demonstrates that the "policy gap" that OCA alleges exists does not, in fact, exist. Company witnesses Mr. Taylor (PPL Electric Statement No. 5-R) and Ms. Johnson (PPL Electric Statement No. 6-R) further address these policy issues. However, it has been my experience in Pennsylvania that OCA's recommendations that seek specific findings and determinations from the Commission related to transmission

costs and transmission cost allocations are fundamentally inconsistent with how the Commission has reviewed utility requests to site and construct HV transmission lines. I will also note that the purpose of PPL Electric's rebuttal testimony addressing OCA's arguments on these out of scope policy and ratemaking issues is solely to clarify the scope of this proceeding and provide information about the existing regulatory process for review of transmission rates and cost allocation.

Q. Outside of OCA's recommendations regarding transmission costs and transmission cost allocation, do you have any other observations about OCA's testimony?

A. Yes, I do. OCA has made several concessions in its direct testimony which support the LON; Mr. Konidena explicitly does not contest the need for the Project, and he also spends several pages of his direct testimony affirming that the engineering and design specifications of the Project are reasonable and acceptable. (OCA Statement 2, pp. 17-30, 45.) Moreover, OCA does not offer testimony that suggests PPL Electric has not complied with applicable statutes and regulations related to the protection of environmental resources, nor does it offer testimony that suggests PPL Electric has failed to minimize adverse environmental impacts associated with the proposed HV transmission lines. As such, while OCA offers arguments and recommendations about issues not germane to the Commission's findings and determinations for a request to site and construct proposed HV lines, it either concedes PPL Electric has satisfied the criteria required to site and construct the Project or fails to offer any evidence contesting the showings made by PPL Electric.

IV. NECESSITY OF THE TOMHICKEN 230 KV SWITCHYARD PROJECT

Q. Do any parties dispute that a need for the Tomhicken 230 kV Switchyard Project exists?

A. Yes. Mr. Felder and Mr. Konidena do not dispute that a need for the Project exists. However, Ms. Cook, Mr. Zola, and several other individuals who testified at the public input hearings in this matter do contest the necessity of the Project.

Q. Please summarize those individuals' testimony as it relates to the need for the Project.

A. Ms. Cook, Mr. Zola, and the public input hearing participants largely argue that the need for the Project is speculative or uncertain, and that ratepayers may be harmed if the Project does not come to fruition. Specifically, Ms. Cook testifies that there is not a need for the Project because of ongoing land use and zoning-related litigation. (Cook Direct at 6.) Additionally, Mr. Zola testifies that "[t]he evidence available . . . does not demonstrate a proven need for this [P]roject." (Tr. at 202.) He argues that the LON itself is premature, and that the Project should not proceed until "an actual demonstrated need exists." (Tr. at 203.) Individuals at the public input hearings argued that there is not a need for the Project based on very similar grounds. (*See, e.g.*, Tr. at 99, 130-131, 202-203, 268, 275.)

Q. What is PPL Electric's obligation to customers who request service?

A. PPL Electric has an obligation to serve. When a customer requests service from PPL Electric, it is required to extend service under the terms and conditions of its Commission-approved tariff.

Q. Did any parties dispute PPL Electric's obligation to serve customers who request electric service?

A. No. Specifically, no party disputed that the Customer made a request for transmission-level service, and no party asserted that PPL Electric is not in compliance with its tariff requirements for purposes of extending service to a requesting customer.

Q. Which rate schedules within the Company's Commission-approved tariff are applicable to customers requesting service at "large" loads?

A. Rates LP-5 and LP-6. Rate LP-5 is applicable to customers taking service at 69 kV or higher. However, Rate LP-6 is specifically applicable to large load (e.g., data center) customers that commenced service on or after October 1, 2025, and who have a peak electric demand of 50 megawatts ("MW") or greater at a single facility, or at least equal to 75 MW in the aggregate among facilities within a 10-mile radius. Rate LP-6 would be applicable to the Customer, based upon its anticipated peak electric demand and the anticipated in-service date.

Q. Are there specific protections in place that are applicable to large load customers served under Rate LP-6 that directly address other parties' concerns regarding the materialization of the Customer's demand?

A. Yes.

Q. What are those protections?

A. Below, I highlight the major protections that the Company already includes as a component of its Electric Service Agreement ("ESA") as well as under its newly approved Rate LP-6.[1] A copy of the form ESA that PPL Electric intends to use to implement the requirements of Rate LP-6 is attached hereto as PPL Electric Exhibit JBL-1R. PPL Electric witness Mr. Taylor provides a further discussion and analysis of the protections already in place in these documents in his rebuttal testimony (PPL Electric Statement No. 5-R), and in particular how those protections proactively address the policy concerns raised by OCA. One major protection that is in place for the Company's customers is the ESA that the Company has executed with the Customer. ESAs contain provisions that bind the customer and protect ratepayers in the event that the Customer's load does not materialize in the amount that was requested. In addition, the Company's LP-6 rate schedule establishes minimum requirements that must be incorporated into the ESA and are specifically designed to mitigate the risk that transmission investments made to serve a large load customer could otherwise be shifted to existing customers. PPL Electric is in the process of renegotiating the ESA with the Customer in order to bring the ESA's terms into alignment with the LP-6 rate schedule.

Among other protections, the LP-6 rate schedule requires a minimum contractual term of ten years and includes minimum load commitments that obligate the Customer to utilize service at specified levels throughout the term of the agreement. For firm service, the Customer is required to maintain a minimum load guarantee equal to 80 percent of its committed load during the first five years of service and 50 percent during the second five

[1] PPL Electric is in the process of renegotiating the ESA to align with the requirements of the new LP-6 rate schedule.

years. These requirements help ensure that transmission facilities constructed to serve the Customer generate the anticipated revenues used to support the investment.

The ESA also requires the Customer to provide financial security associated with transmission system upgrades that are necessary to serve the Customer and would not have been required absent the Customer's interconnection request. This Rate Base Security Obligation is equal to the amount of transmission upgrade costs that are being included in the Company's FERC Transmission Formula Rate and must be secured through an acceptable financial instrument and provides protection to customers if the Customer fails to meet its contractual obligations.

In addition, the ESA contains termination and exit-fee provisions that apply if the Customer voluntarily terminates service before completion of the contractual term. Under the LP-6 framework, the exit fee is based upon the greater of the Customer's remaining minimum load guarantee obligation or the remaining Rate Base Security Obligation. These provisions are intended to ensure that customers who cause significant transmission investments to be made remain financially responsible for those commitments even if their project does not proceed as originally planned. The LP-6 rate schedule further provides that amounts recovered through such exit fees are applied first to reduce the Company's transmission rate base associated with the project and then credited to the Company's transmission revenue requirement.

Finally, the LP-6 framework includes ongoing monitoring mechanisms. The ESA requires the Customer to provide load ramp schedules, and the Company periodically evaluates the Customer's actual and forecasted load levels against its contractual commitments. In addition, the Company submits annual load forecast information to the

Commission that includes information regarding customers operating under ESAs. These provisions provide transparency and allow the Company to monitor whether projected customer load growth is materializing as anticipated. OCA's concerns and recommendations to the contrary are, therefore, unfounded.

Q. How do you respond to Ms. Cook's and Mr. Zola's concerns related to ongoing litigation for zoning matters?

A. The zoning matter which is proceeding before the Commonwealth Court is an entirely separate proceeding from the LON proceeding at hand, and the decision in one matter should have no bearing on the decision in another. I have been advised by counsel that it is not unusual for other regulatory approvals to be in a "pending" status at the time a LON is filed. This is consistent with my extensive experience in the siting of HV transmission lines. Moreover, I have also been advised by counsel that PPL Electric will fully brief the inaccurate characterization of this pending appeal and the actions that can be taken with respect to the zoning and land use approvals sought by the Customer.

I have also been advised by counsel that the Commission may impose conditions on its approval of the LON. Such a condition may be PPL Electric's acquisition of all necessary permits and approvals before initiating construction of the facilities that are the subject of the Project, or more specific to the instant concerns, that the Customer or other customers to be served by the Tomhicken Switchyard will have received necessary approvals have been obtained prior to initiating construction of the facilities.

Finally, I note that the Company was clear in my direct testimony that it is not in the business of building transmission lines to nowhere that serve no purpose. PPL Electric

will continue to coordinate with the Customer regarding its development progress to align its construction activities; however, the Company will only proceed with construction if a need persists.

V. COST ALLOCATION AND RELATION TO PHASE 2

Q. Please summarize Mr. Konidena's direct testimony and recommendations.

A. Mr. Konidena repeatedly emphasizes the same points, which are: (1) the relationship between Phase 1, which is the Tomhicken 230 kV Switchyard Project and Phase 2, which is the Sugarloaf 500/230 kV Transmission Line Project, as he sees it; and (2) the notion that the Project is a customer-driven Project, for a variety of different reasons and to come to various conclusions and recommendations.

For example, he argues that network benefits and the benefits of PPL Electric's proposed breaker-and-a-half configuration for the Tomhicken 230 kV Switchyard are dependent on Phase 2 construction, and cannot be realized under Phase 1 alone. (OCA Statement 2, pp. 29-30, 51, 59-60.) Mr. Konidena also argues that the customer-driven nature of the Project means that all costs should be paid by the Customer, rather than existing ratepayers, and that network benefits are therefore not justified by system reliability needs. (OCA Statement 2, pp. 13, 61-62.) He even dedicates thirty-one pages to argument and recommendations regarding his perception of "Phase 1 and Phase 2 Interdependency." (OCA Statement 2, pp. 65-96.)

Mr. Konidena reaches a few recommendations. He first recommends that the Commission stay approval of the proposed cost allocation until PPL Electric performs a "forward-looking quantitative analysis demonstrating that ratepayer benefits equal or exceed the amount allocated to them." (OCA Statement 2, p. 65.) Next, he recommends

that the Commission require PPL Electric to "submit its Cost Allocation Policy for Large Customer Interconnections for formal Commission review and approval." (OCA Statement 2, p. 65.) He also then recommends that the Commission conditionally approve the proposed cost allocation upon: (1) reallocation of customer-driven design costs; (2) cost recovery from future benefitting customers; and (3) Commission review and approval of PPL Electric's cost allocation policy. (OCA Statement 2, pp. 95-96.)

Q. Do you agree with Mr. Konidena's arguments and recommendations?

A. No. I will respond to each of Mr. Konidena's arguments and recommendations in turn.

Q. Please address Mr. Konidena's arguments with respect to the design of the Tomhicken 230 kV Switchyard as a breaker-and-a-half configuration.

A. Under Phase 1, PPL Electric proposes building the Tomhicken 230 kV switchyard as a breaker-and-a-half configuration due to the total of eight lines to be terminated at the switchyard. Ring buses do not provide the same level of reliability as breaker-and-a-half arrangements. The ring bus arrangement can become segmented during planned and unplanned outages, increasing the risk of load drop or loss of network flow. PJMs Substation Bus Configurations & Substation Design Recommendations state "Reasons for changing from a ring bus to a breaker-and-a-half arrangement might include the criticality or size of the load or generation to be interconnected, or the number of bus positions in existence or planned for the future. The larger the ring bus the greater the probability becomes during normal operations, multi-system events, and maintenance that the substation could become fragmented into multiple pieces thereby losing its level of

reliability." By Mr. Konidena's own admission the breaker-and-a-half operation is justified when a total of nine transmission lines will be terminated at the Tomhicken after the future Phase 2 is completed. Building the new Tomhicken switchyard as an eight-terminal ring bus to only rebuild the switchyard to breaker-and-a-half shortly after commissioning is not a prudent use of capital. The breaker-and-half arrangement of the Tomhicken 230 kV switchyard allows the ability to add additional 230 kV transmission lines to supply other customers or add system capacity.

Q. Please address Mr. Konidena's argument that the network benefits of the Project are customer-driven and not justified by system reliability needs.

A. Mr. Konidena argues that network benefits are not justified by system reliability needs because of the customer-driven nature of the project. What Mr. Konidena misses is that load growth is a well-established transmission planning need recognized by PJM. PJM develops long-term load forecasts that are incorporated into its Regional Transmission Expansion Plan ("RTEP") and used to evaluate the need for future transmission system enhancements. PJM has expressly stated that planners factor long-term load forecasts into RTEP to evaluate transmission upgrades needed to reliably serve future customer demand. Consistent with that planning process, increases in customer load are incorporated into PJM's load forecasts and transmission planning models to identify and resolve any resulting reliability criteria violations. Projects that are needed to address load growth may involve network upgrades, and under current FERC policy network upgrades should be recovered through rates.

Q. Is Mr. Konidena correct that Phase 1 is interdependent on Phase 2?

A. No. While it is true that the Project as proposed under PJM supplemental number S3528 includes both the Phase 1 and Phase 2 scopes, this does not mean that Phase 1 depends upon Phase 2.

Phase 1 includes the installation of the new Tomhicken 230kV switchyard, bifurcation of the Susquehanna – Harwood #1 & #2 230 kV lines, and 230 kV customer connecting lines. Phase 1 is required to connect the Tomhicken 230 kV switchyard to the 230 kV network, connect the Customer to the Tomhicken 230 kV switchyard, and to have the ability to add additional 230 kV lines to support the 230kV network or serve additional customers. Phase 1 will serve the Customer's initial load.

However, as the Customer increases the facility load additional 230kV upgrades are required. Phase 2 includes the 230 kV network upgrades required to ensure reliable operation of the 230 kV network. Phase 2 is needed to serve the Customer's projected load of 965 MW as well as support other proposed load growth in the Hazleton Area.

I acknowledge that bifurcation of the Susquehanna – Harwood #1 & #2 lines did take in account the future Phase 2, Nescopeck – Tomhicken 230 kV line. However, this is simply good transmission planning practice to account for the separate needs associated for Phase 1 and Phase 2 that are being addressed under the same PJM supplemental project. The proposed routing eliminates future 230 kV line crossings or the need to make modifications to or reroute newly built transmission facilities. The bifurcation of the Susquehanna – Harwood #1 & #2 230 kV lines is required to energize the Tomhicken 230 kV switchyard and the proposed routing of the lines to accommodate the Phase 2 network upgrades was a prudent decision as part of the entire project under S3528.

Q. Do you agree with Mr. Konidena's recommendation that the Company perform a forward-looking quantitative analysis demonstrating that ratepayer benefits equal or exceed the amount allocated to them?

A. No. Such a requirement would be inconsistent with longstanding FERC policy applicable to transmission network facilities, which is detailed in the rebuttal testimony of PPL Electric Witness Taylor. As the Company has previously explained in discovery, network transmission facilities provide benefits to all users of the transmission system and there is no requirement that a utility perform a project-specific quantitative analysis demonstrating that future benefits equal or exceed the costs included in transmission rates. Transmission facilities operate as part of an interconnected network whose utilization and benefits evolve over time as system conditions change.

Q. Do you agree with Mr. Konidena's recommendation that the Commission require the Company to submit its Policy on Cost Allocation for Large Customer Interconnections ("Cost Allocation Policy")for formal review and approval?

A. No. Mr. Konidena's recommendation would require the Commission to formally review and approve a policy that addresses the allocation of transmission costs subject to the jurisdiction of the FERC. PPL Electric Witness Taylor describes in detail the established avenues for review of transmission cost allocation before FERC that make an additional Commission approval requirement unnecessary.

Q. Do you agree with Mr. Konidena's recommendation that the Commission conditionally approve the Company's proposed cost allocation upon reallocation of customer-driven design costs, cost recovery from future benefitting customers, and review and approval of the Cost Allocation Policy?

A. No, I do not. As PPL Electric Witness Taylor explains, this recommendation would require the Commission to intrude on FERC's jurisdiction and diverge from longstanding FERC principles and policies.

Q. Is Mr. Konidena's testimony that the Tomhicken 230 kV Switchyard Project exists for the sole benefit of the Customer a fair characterization of the benefit provided by and necessity of the Project? (OCA Statement 2, pp. 13, 25, 45.)

A. No. Simply because the Customer's requested interconnection initiated the need for the Project does not mean that the transmission upgrades associated with that interconnection will only serve the Customer after they are placed in service. Sections VII and VIII of PPL Electric Witness Taylor's rebuttal testimony provide a thorough explanation of the differences between customer-driven and customer-specific investments, and the reasons that forward-looking transmission design features are incorporated in this Project.

Q. Is Mr. Konidena's testimony that the Tomhicken 230 kV Switchyard Project will not produce network benefits sufficient to justify the proposed cost allocation a fair characterization of the benefit provided by the Project? (OCA Statement 2, p. 51.)

A. The Tomhicken 230 kV Switchyard will serve the proposed Customer's 230-34 kV substation but is not solely dedicated to the Customer's use. The Tomhicken 230 kV

Switchyard will be part of PPL Electric's 230 kV network with load flow continuing south towards the Harwood 230-69 kV substation. The Tomhicken Switchyard will allow for additional 230 kV terminations for additional network capacity, with Phase 2 bringing a new 230 kV line from Nescopeck 230 kV switchyard. The Tomhicken 230 kV Switchyard will have additional capacity and termination points to serve other customers in the Hazleton area.

Q. What is the purpose of the Company's Cost Allocation Policy?

A. The purpose of the Cost Allocation Policy is to provide a consistent framework for evaluating the facilities associated with large customer interconnection projects and determining whether those facilities should be directly assigned to the interconnecting customer or recovered through the Company's FERC Transmission Formula Rate. The policy helps ensure that cost-allocation decisions are based on the function and purpose of the facilities being constructed, rather than solely on the fact that a particular customer's request initiated the project. More specifically, the policy is intended to distinguish between facilities that are customer-specific and exclusively serve the interconnecting customer, such as direct connection facilities, and facilities that become part of the integrated transmission network and provide broader benefits to the transmission system and other customers. The policy identifies factors such as reliability, capacity, congestion relief, resiliency, operational flexibility, service to multiple customers, and support for future system needs that may indicate the existence of network benefits. Importantly, the policy was developed to implement and apply existing FERC policy and precedent regarding transmission cost allocation. It was not created to establish a new ratemaking

methodology or a new standard for cost recovery. Rather, it provides internal guidance to Company personnel on how to evaluate transmission facilities in a manner consistent with FERC precedent recognizing that, because of the integrated nature of the transmission system, network facilities may appropriately be recovered through transmission rates even when they are initially constructed in response to a particular customer's request for service. Finally, the policy does not operate outside of existing regulatory oversight. Mr. Taylor describes the existing FERC regulatory process, which includes opportunities for third-party challenges, in PPL Electric Statement No. 5-R.

Q. Please respond to Mr. Konidena's argument that the Company "misapplied its own standard" for cost allocation. (OCA Statement 2, p. 105.)

A. Mr. Konidena's argument rests on a misreading of the Company's Responsibility of Asset Matrix. The Matrix is a set of illustrative, generic examples — "Breaker-and-a-Half (BAAH) Example 1," "Double Breaker Double Bus Example 2," and so on — used to explain, at a high level, how the Company distinguishes direct-customer costs from network costs. The "Bay 1" that appears in BAAH Example 1 is a hypothetical bay in that illustrative example; it is not the Tomhicken 230 kV Switchyard one-line diagram, and it does not depict the actual configuration or function of Bay 1 at Tomhicken. Mr. Konidena errs by treating the illustrative "Bay 1" in the Matrix as though it were the real Bay 1 at Tomhicken and then concluding that the Company deviated from its own standard.

The Company did not misapply its standard. It applied the methodology in the Matrix — assign facilities that serve only the customer to the customer, and assign facilities

that provide network benefits to transmission rate base — to the actual Tomhicken Switchyard arrangement.

Applied to the real facility, Bay 1 at the Tomhicken Switchyard serves two functions:

- **Function 1 — Customer feed**. Bay 1 provides the customer's feed. The direct-connection facilities that serve only the customer have been directly assigned to the customer, consistent with the Matrix. The customer is responsible for its direct connection facilities, including the associated 230 kV breaker and the direct-connection transmission line substation equipment that supplies the customer's substation.
- **Function 2 — Network source.** Bay 1 also terminates the network source from Susquehanna #1. It is this network source connection that integrates the switchyard into the bulk transmission system and makes the Tomhicken Switchyard a network facility rather than a facility dedicated solely to the customer.

Because the Tomhicken Switchyard is a network facility, it provides benefits beyond the interconnecting customer that, under the Company's policy, are properly included in transmission rate base, including:

- Service to multiple transmission customers and/or retail feeders;
- Increased resiliency and operational flexibility; and
- Expanded capacity for new generation flow and interconnections.

In short, the Company applied its standard correctly. Mr. Konidena's "misapplied its own standard" argument depends on equating the generic Bay 1 in an illustrative example with the functionally distinct Bay 1 at Tomhicken. Once the Matrix methodology is applied

to the switchyard's actual configuration — a bay that both feeds the customer and terminates a network source — the resulting allocation of direct-connection costs to the customer and network facilities to rate base is fully consistent with the Company's cost allocation policy.

Q. Do you agree that the Company's ratepayers should not pay the cost as proposed by the Company because its "own comparable precedent" demonstrated a cost allocation which did not align with the instant proposed cost allocation? (OCA Statement 2, pp. 106-107.)

A. No, I do not. Mr. Konidena's argument is based on a fundamental misunderstanding of the Company's Cost Allocation Policy. The policy is not a percentage-based methodology that requires all large customer interconnection projects to have similar cost allocations. Nor does the policy establish a predetermined ratio of customer-funded costs and transmission-funded costs that must be applied consistently across all projects. Rather, the policy requires a case-by-case evaluation of the specific facilities being constructed and the function those facilities will perform within the transmission system. The focus of the analysis is on whether a particular facility is customer-specific or whether it provides broader transmission network benefits. As explained by Mr. Taylor, PPL Electric's case-by-case analysis appropriately produces different cost allocations due to the differing nature of the facilities required.

Mr. Konidena cites the example of "Customer 2" as purported evidence that the allocation proposed for the Tomhicken Project is inconsistent with Company precedent.[2] However, the Customer 2 project involved materially different facts and system conditions than those present here. The facilities required to serve Customer 2 were substantially more limited and were largely dedicated to serving that specific customer. Customer 2 is located in close proximity to an existing generation source and transmission infrastructure, which reduced the need for significant network upgrades. As a result, a much larger portion of the project consisted of facilities whose primary function was to connect and serve that customer, making direct assignment appropriate.

By contrast, the Tomhicken Project includes significant transmission infrastructure that becomes part of the integrated 230 kV transmission network and performs functions that extend beyond simply connecting a single customer. As discussed elsewhere in my testimony and the testimony of Mr. Taylor, the Company evaluated the purpose and function of each project component and concluded that certain facilities provide broader transmission benefits, including increased operational flexibility, reliability, and network capability. Consistent with the Cost Allocation Policy, those facilities were evaluated based upon their function within the transmission system, not merely on the identity of the customer that triggered the need for the project.

Accordingly, I disagree with Mr. Konidena's conclusion. The Customer 2 example does not establish a precedent requiring a particular allocation percentage in this proceeding. Rather, it demonstrates that the Company's policy operates as intended by

[2] Witness Konidena appears to be referring to PPL Electric's LON application for the Susquehanna 230kV and 500kV Transmission Line Project filed in Docket No. A-2025-3056806, which was approved by the Commission through a LON proceeding and involved the construction of new 230 kV and 500 kV facilities to serve a large new customer in Luzerne County.

evaluating each project individually and assigning costs based upon the functionality and benefits of the specific facilities being constructed. Two projects with materially different transmission configurations, system impacts, and facility functions should not be expected to produce identical cost-allocation outcomes.

Q. Please respond to Mr. Konidena's repeated assertions that the design of the Tomhicken 230 kV Switchyard was driven by the Sugarloaf 500/230 kV Transmission Line Project. (OCA Statement 2, pp. 25, 28.)

A. The Tomhicken 230kV Switchyard would have been designed in a breaker-and-a-half arrangement regardless of the Phase 2 scope. The Tomhicken 230 kV Switchyard design incorporates the Phase 2 "Sugarloaf 500/230 kV Transmission Line Project" scope but is not the driver for the breaker-and-a-half arrangement. With eight lines to be terminated at Tomhicken 230 kV Switchyard under Phase 1, a breaker-and-a-half arrangement was the preferred alternative. Per PPL Electric System Planning Development Standards, ring buses are not utilized for new construction. Breaker-and-a-half arrangements are the design basis because of the balance of operational flexibility and cost, which this design affords. A double breaker – double bus arrangement was not selected as it would have required a longer 230 kV switchyard, additional terminal equipment, and additional 230 kV breakers. PJM's Substation Bus Configurations & Substation Design Recommendations state "Reasons for changing from a ring bus to a breaker-and-a-half arrangement might include the criticality or size of the load or generation to be interconnected, or the number of bus positions in existence or planned for the future. The larger the ring bus, the greater the probability becomes during normal operations, multi-system events and maintenance that

the substation could become fragmented into multiple pieces thereby losing its level of Reliability". The Tomhicken 230 kV Switchyard is designed for six initial bays with space for two additional bays for a total of eight bays, allowing for the termination of sixteen 230 kV lines. A ring bus of this size would be very large and would present operational risk during planned and unplanned outages.

Q. Is Mr. Konidena's testimony that the benefits of the Tomhicken 230 kV Switchyard are contingent upon the Sugarloaf 500/230 kV Transmission Line Project accurate? (OCA Statement 2, pp. 29-30, 51, 59-60.)

A. No. While the initial Phase 1 scope does not directly increase the capacity of the Susquehanna – Harwood corridor, the Tomhicken 230 kV switchyard provides the benefit of the expansion of the 230 kV network as well as serving the new customer. The Tomhicken 230 kV Switchyard will allow for additional transmission lines which will increase system reliability by adding additional 230 kV paths from the Susquehanna area to the Hazleton area. The proposed phases will increase capacity of the transmission system. The new Tomhicken Switchyard will have ability to add additional 230 kV transmission lines to supply other customers or add system capacity. The new 230 kV transmission lines and Tomhicken 230 kV Switchyard provide additional system resiliency and greater operational flexibility to take outages. The Tomhicken 230kV switchyard is part of the 230 kV network, will have additional network line terminations, and can serve additional 230kV customers. The Tomhicken 230 kV Switchyard is not solely dedicated to serving the customer and provides system benefit as the switchyard is built out over time to its final configuration.

VI. PUBLIC OUTREACH AND NOTICE

Q. Do any of the parties provide testimony about the notice provided for the Tomhicken 230 kV Switchyard Project?

A. Yes. Ms. Cook testified that the Company "did not properly notify the public that is directly affected by Phase 1 of the Project." (Cook Direct, p. 15.) She bases this averment on the newspapers selected by the Company to originally publish notice within Luzerne County, PA, and on an issue experienced by PPL Electric with a newspaper when it published notice of the public input hearings. (Cook Direct, p. 15.) Other individuals at the public input hearings also testified about concern with public input hearing notice. (Tr. at 299, 334.)

Q. What parties must be provided with notice of the filing of an LON?

A. The parties that must be provided with notice are: the Secretary of the Department of Transportation; the Chairman of the Historical and Museum Commission; local, state, and federal governmental agencies which have requirements to be met in connection with the construction or maintenance of the proposed HV line; and known persons, corporations, and other entities of record owning property within the proposed ROW.

Q. Was notice provided to the parties you listed in the above question?

A. Yes.

Q. Was any other notice provided to affected landowners or to the general public within the Project area?

A. Yes. Consistent with the direction that the Company received, it published notice of the LON and the prehearing conference, and of the public input hearings. The Company's proofs of publication associated with those notices are publicly available on the docket for this matter.

Q. Did the Company experience any issues with publication of notice of the public input hearings?

A. Yes. PPL Electric was informed that the Wilkes Barre Citizens' Voice failed to publish notice on June 9, 2026, as it had been agreed upon between PPL Electric and Wilkes Barre Citizens' Voice. The omission was the result of an error by the publication, and only impacted one of the dates when the notice was scheduled to be published. PPL Electric informed the ALJs and parties, and filed a letter explaining the discovery on the same day that it was informed of the omission, June 29, 2026. PPL Electric also took the most reasonable action possible to remedy the situation, which was to direct the Wilkes Barre Citizens' Voice to publish the notice on the very next day, which was June 30, 2026.

Q. Would you like to provide any other comment regarding the parties' concerns about public notice?

A. Yes. I would like to note once again that Ms. Cook specifically took issue with the fact that notice of the public input hearings was not published in the Wilkes Barre Citizens' Voice on June 9, 2026. (Cook Direct, p. 15.) However, Ms. Cook testified at the prehearing conference in this matter that "most of us here in Hazle Township and Sugarloaf Township do not have subscriptions to [the Wilkes Barre Citizens' Voice and Wilkes Barre Times

Leader],” and that “anything up north is really not going to get here.” (Tr. at 41.) Thus, and while PPL Electric does not take the publication issue lightly, I would reiterate that notice of the Public Input Hearings was still provided across two dates and three publications, and within two different areas of Luzerne County, one of which was specifically requested by Ms. Cook.

VII. CONCLUSION

Q. Does this conclude your Rebuttal Testimony at this time?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

AGREEMENT FOR LARGE LOAD ELECTRIC SERVICE

This **AGREEMENT FOR LARGE LOAD ELECTRIC SERVICE** (this "**Agreement**") dated Click here to enter a date (the "**Effective Date**"), is hereby made and entered into by and between PPL Electric Utilities Corporation ("**PPL EU**"), with a business address of 645 Hamilton St., Suite 601, Allentown, Pennsylvania 18101, and Click here to enter Customer's name ("**Customer**"), with a business address at Click here to enter Customer's address. PPL EU and Customer are sometimes hereinafter referred to individually as a "**Party**" and together as the "**Parties**."

RECITALS

WHEREAS, PPL EU is a "public utility" and "electric distribution company" as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S.A. §§ 102, 2803, that offers electric service to customers pursuant to its tariff approved by the Pennsylvania Public Utility Commission ("**Commission**") presently in effect, as the same may be amended from time to time, a copy of which is available at www.pplelectric.com ("**Tariff**"); and

WHEREAS, Customer desires to receive retail electric service at voltages at or above 69,000 volts from PPL EU ("**Electric Service**") to the Customer's facility located at Click here to enter address, county, state, and GPS location for Customer's facility ("**Customer Facility**"); and

WHEREAS, PPL EU is willing to provide such Electric Service to the Customer Facility in accordance with, and pursuant to, the terms and conditions set forth in this Agreement.

NOW THEREFORE, in consideration of the mutual covenants and agreements set forth herein, and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged and accepted, and intending to be legally bound, the Parties agree as follows:

AGREEMENT

1. CONSTRUCTION AGREEMENT. The Parties entered into an Agreement for Construction of Large Load Electric Service Facilities with respect to the Customer Facility (as may be amended, modified, or supplemented, the "**Construction Agreement**"). The provision by PPL EU, and receipt by Customer, of Electric Service to the Customer Facility under this Agreement is conditioned upon completion of the Construction Work (as defined in the Construction Agreement) and PPL EU's receipt of any and all amounts due and owing from Customer to PPL EU under the Construction Agreement. If the Construction Agreement terminates for any reason prior to completion of the Construction Work, this Agreement shall automatically terminate.

2. ELECTRIC SERVICE. Commencing on the In-Service Date and continuing during the Term, PPL EU shall provide to Customer, and Customer shall purchase and receive from PPL EU, Electric Service at the Service Point for the operation of the Customer Facility. PPL EU will provide Electric Service sufficient to meet the Contract Capacity during each applicable period all as set forth in **Schedule A**. The delivery and

receipt of Electric Service shall be in accordance with the rules, terms, conditions, and provisions of this Agreement and the Tariff.

3. TERM. This Agreement commences on the Effective Date and, unless sooner terminated or extended as permitted under this Agreement, expires ten (10) years after the In-Service Date ("**Initial Term**"). Immediately upon expiration of the Initial Term, this Agreement shall automatically renew for consecutive five (5) year periods unless sooner terminated as permitted under this Agreement (each, a "**Renewal Term**"). Customer shall have the right to terminate this Agreement, effective upon expiration of the Initial Term or any Renewal Term, by delivering written notice thereof to PPL EU at least twelve (12) months prior to the expiration of the Initial Term or any applicable Renewal Term. The Initial Term and any Renewal Term are collectively referred to herein as the "**Term**".

4. MINIMUM REVENUE AND ELECTRIC SERVICE COMMITMENTS. The following provisions are a material condition for PPL EU's provision to Customer of Electric Service under this Agreement:

a. Commencing on the In-Service Date and continuing during the Term, Customer's monthly payment for Electric Service under this Agreement shall be equal to the Transmission Service Charge for the greater of (i) the actual amount of Electric Service supplied to Customer during such month, or (ii) the Minimum Contract Capacity, which Minimum Contract Capacity will be utilized to determine the Customer's network integrated transmission service ("**NITS**") value.

b. During the Term, Customer must satisfy the Electric Service Commitment. If this Agreement terminates or expires prior to satisfaction of the Electric Service Commitment, Customer shall pay to PPL EU, within thirty (30) days thereafter, the Unsatisfied Electric Service Commitment.

On the Effective Date, estimated Rate Base Expenses (as defined in the Construction Agreement) were used to establish **Schedule A**, including the Contract Capacity, Minimum Contract Capacity, and Electric Service Commitment. Upon completion of the Rate Base PPL EU System Upgrades (as defined in the Construction Agreement), PPL EU shall revise **Schedule A** using the actual Rate Base Expenses and provide such revised **Schedule A** to Customer. Such revised **Schedule A** shall amend and restate, in its entirety, as of the Effective Date, the original **Schedule A**, and each Party shall update its counterpart of this Agreement by replacing the original **Schedule A** with such revised **Schedule A.**

5. SERVICE RATES. Customer shall pay for Electric Service in accordance with the applicable rate schedules set forth in the Tariff. Customer shall make payments to PPL EU within thirty (30) days after Customer's receipt of each invoice from PPL EU.

6. CREDIT SUPPORT.

a. On or prior to the Effective Date, Customer shall, at its own cost and expense, deliver to PPL EU, and maintain during the Term, Credit Support acceptable to PPL EU to secure Customer's obligations under this Agreement. PPL EU shall have the right, at its option, to draw upon, use, or otherwise enforce the Credit Support (i) to pay any amounts owed by Customer to PPL EU under this Agreement, and (ii) as provided

under the terms of this Agreement, the Credit Support, or any other written agreement between the Parties. Customer hereby grants to PPL EU a present and continuing first-priority security interest in, and lien on (and right of setoff against), and assignment of, all Cash and Cash Equivalent Collateral, whether now or hereafter held by, on behalf of, or for the benefit of PPL EU, and Customer agrees to take such action as may be reasonably requested by PPL EU, at any time, to perfect or maintain the perfection at all times of PPL EU's first priority security interest in, and lien on (and right of setoff against), such Cash and Cash Equivalent Collateral.

b. Customer shall promptly (and, in any event, within five (5) Business Days after PPL EU's demand therefor, or such longer period of time as may be agreed to in writing by PPL EU) deliver to PPL EU replacement Credit Support acceptable to PPL EU (i) at least thirty (30) days prior to the expiration of any Letter of Credit, (ii) whenever there is an adverse change in the credit standing of the Customer (in which event PPL EU may also revise the Credit Support Amount and/or the Minimum Credit Support Amount), (iii) whenever there is an adverse change in the credit standing of any guarantor that provided a Guaranty to PPL EU as part of the Credit Support (in which event PPL EU may also revise the Credit Support Amount and/or the Minimum Credit Support Amount), or (iv) whenever the issuer of any Letter of Credit is no longer a Qualified Institution, becomes Bankrupt, wrongfully dishonors any presentation thereunder, fails to timely perform or comply with any of its obligations thereunder, repudiates, disaffirms, disclaims, or rejects, in whole or in part, or challenges the validity of the Letter of Credit or any of its obligations thereunder, or provides notice that it will not be renewing any Letter of Credit. If PPL EU does not timely receive such replacement Credit Support, then PPL EU shall have the right, at its option, and in addition to any other remedies under this Agreement, at law, or in equity, to draw upon any Letter of Credit, in whole or in part, and hold such cash as all or part of the Credit Support required under this Agreement.

7. CUSTOMER OBLIGATIONS.

a. As a condition to receiving Electric Service Customer shall (a) perform and complete the Customer Scope of Work, (b) comply with all duties, responsibilities, and obligations set forth in the Tariff, (c) provide the Disconnection Facilities at the Service Point, (d) maintain the Customer Facility up to the Service Point, (e) operate according to the Operating Instruction, (f) deliver and maintain the Credit Support as required under this Agreement, and (g) grant to PPL EU all real property rights and access to the Customer Facility necessary for PPL EU to perform its rights and obligations under this Agreement, including, without limitation, such rights to any applicable system(s) at or pertaining to the Customer Facility (collectively, the "**Electric Service Conditions**"). Whether Customer has successfully fulfilled the Electric Service Conditions shall be determined by PPL EU. Customer shall be obligated to pay for Electric Service under this Agreement notwithstanding that Customer may not receive Electric Service due to Customer's failure to fulfill or comply with the Electric Service Conditions.

b. Any changes to the Customer's Interconnection Relaying or Disconnection Facilities (as defined in PPL EU Standards located at PPL EU Standards) must be approved by PPL EU in writing prior to implementation. If the Customer Facility includes generation equipment owned by the Customer, the Customer Scope of Work must include protections to prevent the Customer's generation equipment from backflowing onto PPL EU's grid. This Agreement does not permit Customer to be

compensated for excess generation. If Customer desires to be compensated for excess generation, Customer must apply and receive approval through the applicable interconnection processes of PPL EU and/or PJM.

8. PPL EU OBLIGATIONS. Subject to Customer fulfilling the Electric Service Conditions and otherwise complying with Customer's obligations under this Agreement and the Tariff, commencing on the In-Service Date and continuing during the Term PPL EU shall (a) operate and maintain Electric Service of 69 kV or higher to Customer, (b) provide facilities in the form of three-phase Electric Service, at approximately Choose an item. Volts at the Service Point (see **Schedule D** of this Agreement), and (c) operate according to the Operating Instruction. Customer acknowledges and agrees that this Agreement does not provide for, and that PPL EU is not responsible for and makes no representation or warranty regarding the availability of, electric generation to supply the Customer Facility.

9. PPL EU MAINTENANCE OUTAGES. PPL EU will make commercially reasonable efforts to notify Customer upon knowledge of impending maintenance, repair or replacement activities at least five (5) Business Days in advance of a scheduled outage for periodic maintenance or repair. Customer shall cooperate fully with PPL EU when PPL EU notifies Customer that an outage to the Electric Service or any other electric service is necessary for PPL EU to perform periodic or emergency maintenance, repair and/or replacement. If Customer does not cooperate when notified by PPL EU of a necessary outage for periodic or emergency maintenance, repair and/or replacement, PPL EU may, pursuant to the Tariff, temporarily suspend service to Customer to perform necessary maintenance, repair and/or replacement. PPL EU shall not, in any event, be required to provide advance notice to Customer of an outage to Electric Service or any other electric service if such outage is necessary for any emergency maintenance, repair and/or replacement, provided PPL EU will make commercially reasonable efforts to notify Customer at least one (1) hour in advance of any emergency maintenance, repair and/or replacement.

10. OBSERVATION OF DEFICIENCIES. If PPL EU observes a violation of Good Utility Practice, Applicable Laws, any abnormal condition in connection with the Customer Facility, or becomes aware of a lack of scheduled maintenance or testing with respect to the Customer Facility and/or Customer equipment that may affect PPL EU's facilities or services, PPL EU shall provide prompt notice under the circumstances to Customer. PPL EU's review, inspection, and approval related to the Customer Facility shall be limited to the purpose of assessing the safety, reliability, protection and control of PPL EU's facilities and shall not be construed as confirming or endorsing the design of any portion of the Customer Facility, or as a warranty of any type, including the safety, durability or reliability of the Customer Facility. Customer acknowledges that Customer is fully liable for the Customer Facility, and Customer hereby (i) waives, releases, indemnifies, defends, and holds harmless PPL EU from and against any and all third-party Claims related to or arising from the Customer Facility, including, without limitation, any deficiency in the Customer Facility, and/or any outages in the Electric Service, and (ii) waives, releases, and holds harmless PPL EU from and against any and all Claims related to or arising from any outages, disruptions, or terminations in Electric Service excluding only those Claims that may be generally available to customers against PPL EU under the Tariff.

11. ALTERNATE OR REDUNDANT SUPPLY. Customer requests alternate and/or redundant supply, in addition to the Service Point, as follows:

Alternate Supply (*check one*):

☐ Standard three-phase service at approximately Choose an item. volts at the point where PPL EU's overhead service conductors terminate on the line side terminals of Customer's alternate service disconnecting facilities ("**Alternate Service Point**").

☐ No alternate supply.

Redundant Supply (*check one*):

☐ Redundant supply/multiple primary feeds.

☐ No redundant supply/no multiple primary feeds.

If a box is not checked above for either alternate supply or redundant supply, Customer has not requested any such supply. If Customer has not requested alternate supply or redundant supply as of the Effective Date, (i) Customer may request alternate supply or redundant supply at any time during the Term by providing written notice thereof to PPL EU**,** (ii) the provision of any such alternate or redundant supply shall be subject to additional (x) terms and conditions, and (y) costs and expenses to be paid by Customer to reflect additional costs and expenses incurred by PPL EU with respect to development of PPL EU's system to accommodate such supply, and (iii) PPL EU shall have no obligation to provide alternate supply or redundant supply, as applicable, unless and until the Parties enter into a written agreement incorporating such additional terms, conditions, costs, and expenses.

12. CUSTOMER POWER QUALITY AND HARMONIC DISTORTION, VOLTAGE FLICKER OR REVERSE FLOW.

a. Customer must comply with the following minimum requirements to ensure grid stability, power quality, and reliability under normal and contingency conditions:

- Voltage Flicker: Maintain within IEEE 1453 limits.
- Reactive Support: Provide adequate VAR control to avoid voltage instability
- Power Factor: Maintain ≥ 0.98 pf lagging
- Provide detailed load models to PPL EU when any electrical system modification or operational changes are initiated (including UPS, cooling systems, and backup generation) for stability studies.
- Customer electrical equipment shall allow utility protection schemes to provide timing for up to three (3) transmission line reclose attempts before backup generators are initiated (230kV).

b. To prevent sudden large changes in demand that could destabilize voltage, frequency, or thermal limits on the transmission system, Customer must comply with the following load change limitations:

- Maximum changes: ≤ 50 MW per minute
- May have to utilize UPS to buffer demand

c. If the Customer Facility or any Customer electric equipment at any time introduces harmonic distortion or voltage flicker on PPL EU's electric transmission system which adversely affects the operation of PPL EU's electric transmission system or PPL EU's electric service to PPL EU's other customers, in each case as determined by PPL EU, PPL EU will notify Customer and Customer shall, at its sole cost and expense and in accordance with PPL EU specifications, perform all corrective measures to reduce the magnitude and frequency of the voltage flicker, install harmonic filter(s) designed to limit individual harmonics to those levels acceptable to PPL EU, or take such other steps, as determined by PPL EU, necessary to reduce voltage flicker or harmonic distortion to the levels acceptable to PPL EU. If Customer does not take such corrective measures, or if the corrective actions are insufficient in the opinion of PPL EU, Customer may be required by PPL EU to curtail operation until such corrective measures are implemented. The provisions of this Section apply to the Service Points.

Maximum Allowable Harmonic Voltage Distortion		
Voltage Level	Distortion Factor (% System Voltage)	Individual Harmonic (% System Voltage)
69 kV through 138 kV	1.25	1.0
230 kV through 500 kV	1.0	0.75

d. Due to the large size of Customer's motors, Customer-installed Point of Contact relaying is required to have the reverse power function as an available function in the relay chosen from the PPL EU Approved Customer Point of Contact and Generator Intertie Protective Devices. The reverse power function must be implemented in the design of the Point of Contact relaying.

13. CONVERSION TO Choose an item. **VOLTS**. The Parties agree that should PPL EU increase its service voltage to Choose an item. Volts, Customer shall, at Customer's sole cost and expense, make any changes necessary to Customer's substation equipment, and shall reimburse PPL EU for any costs and expenses incurred by PPL EU to accommodate the changes to Customer's substation equipment to accept electric service from PPL EU at Choose an item. Volts. PPL EU shall notify Customer of PPL EU's intent to change the service voltage to Choose an item. Volts as soon as reasonably practicable, but in no event less than two (2) years in advance.

14. REGULATORY RESTRICTIONS. PPL EU's obligations under this Agreement are subject to all Applicable Laws and the Tariff.

15. FORCE MAJEURE. Neither Party shall be responsible or liable to the other Party for any loss or damage for failure or delay in the performance of such Party's obligations under this Agreement to the extent the failure or delay is caused by a Force Majeure Event. For the avoidance of doubt, a Force Majeure Event shall not waive, reduce, or otherwise modify Customer's obligation to satisfy the Electric Service Commitment pursuant to the terms of this Agreement during the continuance of any Force Majeure Event or otherwise.

16. PERMITS AND LICENSES. Each Party shall use commercially reasonable efforts to obtain and maintain any Permits required in connection with the provision and/or receipt, as applicable, of Electric Service under this Agreement including, without limitation, any scope of work required to be performed by either Party hereunder. If a Party is unable to obtain or maintain any Permit, such Party shall notify the other Party in writing together with details thereof, and the Parties shall, for a period of at least ninety (90) days thereafter (or such other period of time as mutually agreed to by the Parties in writing), use good faith and diligent efforts to endeavor to resolve such matter. If the Parties are unable to resolve such matter and, as a result of such matter, Electric Service cannot be provided to or received by Customer in accordance with Good Utility Practice and the terms of this Agreement and the Tariff, then either Party shall have the right to terminate this Agreement.

17. REPRESENTATIONS AND WARRANTIES. Customer hereby represents and warrants as follows:

a. Customer is duly incorporated, validly existing and in good standing under the laws of the state of its incorporation, and has all requisite power and authority to execute, deliver, and perform its obligations under this Agreement.

b. Customer's execution and delivery of this Agreement and the performance of its obligations under this Agreement, have been duly authorized by all necessary actions and do not and, under existing facts and law, shall not: (i) contravene its certificate of incorporation or any other governing documents; (ii) conflict with, result in a breach of, or constitute a default under any agreement to which it is a party; or (iii) violate any Applicable Law.

c. This Agreement has been duly executed and delivered on behalf of Customer and, assuming the due execution hereof and performance hereunder by PPL EU, constitutes a legal, valid, and binding obligation of Customer, enforceable against it in accordance with its terms, except as such enforceability may be limited by law or principles of equity.

d. As of the Effective Date, there are no actions, suits or other proceedings, at law or in equity, by or before any governmental entity or agency or any other body pending or, to the best of its knowledge, threatened against or affecting Customer which relate in any manner to this Agreement or any transaction contemplated hereby, or which Customer reasonably expects to lead to a material adverse effect on the validity or enforceability of this Agreement or Customer's ability to perform its obligations under this Agreement.

e. The execution, delivery and performance by Customer of its obligations under this Agreement do not and, under existing facts and law, shall not, require any Authorizations by any individual, business entity, governmental authority, or otherwise which has not been duly obtained, made or taken or that shall be duly obtained, made or taken on or prior to the date required, and all such Authorizations are in full force and effect, final and non-appealable as required under Applicable Law (including, without limitation, any such Authorizations that Customer may require from the record owner of the Customer Facility and the real property on which the Customer Facility is located).

f. There are no Bankruptcy proceedings pending against or being contemplated by Customer, or, to Customer's knowledge, threatened against it.

18. LIMITATION OF LIABILITY. NEITHER PARTY SHALL BE LIABLE TO THE OTHER PARTY FOR ANY SPECIAL, INDIRECT, INCIDENTAL, PUNITIVE, OR CONSEQUENTIAL LOSSES, DAMAGES, JUDGMENTS, FINES, PENALTIES, COSTS OR EXPENSES WHATSOEVER INCLUDING, BUT NOT LIMITED TO: (I) DELAYED, LOST OR REDUCED PROFITS, REVENUES, EFFICIENCY, PRODUCTIVITY, BONDING CAPACITY, BUSINESS OPPORTUNITIES; OR (II) INCREASED OR EXTENDED OVERHEADS, OPERATING, MAINTENANCE, DEPRECIATION, FINANCING COSTS OR EXPENSES ARISING OUT OF, RELATED TO, OR IN CONNECTION WITH THE PERFORMANCE OR BREACH OF THIS AGREEMENT WHETHER BASED UPON CONTRACT, TORT (INCLUDING NEGLIGENCE), WARRANTY, STRICT LIABILITY OR UNDER ANY OTHER LEGAL OR EQUITABLE THEORY.

19. TERMINATION; TERMINATION PAYMENT. This Agreement may be terminated (i) as expressly permitted under this Agreement, or (ii) upon the mutual written agreement of the Parties. Additionally, PPL EU shall have the right to terminate this Agreement as provided for in the Tariff or Applicable Law, or if Customer fails to complete the Customer Scope of Work prior to the In-Service Date. If this Agreement terminates for any reason except as the sole result of PPL EU's gross negligence or intentional misconduct, Customer shall pay to PPL EU, within thirty (30) days after such termination, the Termination Payment in addition to any other costs and expenses Customer is required to pay to PPL EU under this Agreement.

20. ASSIGNMENT; TRANSFER OF CUSTOMER FACILITY. Customer shall not assign or otherwise transfer this Agreement, in whole or in part, without the prior written consent of PPL EU, in PPL EU's sole discretion. Prior to Customer selling, transferring, terminating, or otherwise ceasing to operate the Customer Facility, Customer shall provide PPL EU with written notice thereof. Customer acknowledges that Customer shall not be released from any of its obligations under this Agreement in the event of any such assignment, sale, transfer, termination, or cessation of operations, unless expressly agreed to by PPL EU in writing. Any assignment or other transfer of this Agreement by Customer in violation of the terms of this Agreement shall be null and void and of no force or effect.

21. BINDING EFFECT. The provisions of this Agreement shall inure to the benefit of, and be binding upon, the heirs, executors, administrators, successors, and permitted assigns of the respective Parties.

22. AMENDMENTS. This Agreement may only be amended, modified or supplemented by an agreement in writing signed by each Party. No waiver by any Party of any of the provisions hereof shall be effective unless explicitly set forth in writing and signed by the Party so waiving. Except as otherwise set forth in this Agreement, no failure to exercise, or delay in exercising, any rights, remedy, power or privilege arising from this Agreement shall operate as, or be construed as, a waiver thereof; nor shall any single or partial exercise of any right, remedy, power or privilege hereunder preclude any other or further exercise thereof or the exercise of any other right, remedy, power or privilege.

23. CONFLICTS. In the event of a conflict between the terms, conditions, provisions, or rules in this Agreement, any Schedule attached to this Agreement, and/or the Tariff, such conflict shall be resolved in the following order of precedence: (a) first, the terms, conditions, provisions, and rules of the Tariff which shall prevail and control over all other agreements between the Parties relating to the subject matter of this Agreement, (b) second, the terms, conditions, and provisions of this Agreement, and (c) third, the terms, conditions, and provisions of any Schedules.

24. GOVERNING LAW AND VENUE. This Agreement shall be governed by the laws of the Commonwealth of Pennsylvania. The Parties shall bring any legal action or proceeding arising out of or relating to this Agreement in the Commission or in any federal court sitting in the Eastern District of the Commonwealth of Pennsylvania; provided, however, that if the Commission or such federal court does not have jurisdiction over such action or proceeding, such action or proceeding shall be heard and determined exclusively in any Pennsylvania state court sitting in Northampton County or Lehigh County or other applicable regulatory agency. The Parties consent to the exclusive jurisdiction of the Commission and/or such courts for the purpose of all regulatory or legal actions and proceedings arising out of or relating to this Agreement. EACH PARTY WAIVES, TO THE FULLEST EXTENT PERMITTED BY APPLICABLE LAW, ANY OBJECTION THAT IT MAY NOW OR LATER HAVE TO THE LAYING OF VENUE AS PROVIDED IN THIS SECTION AND ANY CLAIM THAT ANY ACTION OR PROCEEDING BROUGHT IN THE COMMISSION OR ANY SUCH COURT HAS BEEN BROUGHT IN AN INCONVENIENT FORUM.

25. WAIVER OF JURY TRIAL. EACH PARTY, TO THE EXTENT PERMITTED BY APPLICABLE LAW, KNOWINGLY, VOLUNTARILY, AND INTENTIONALLY WAIVES ITS RIGHT TO A TRIAL BY JURY IN ANY ACTION OR OTHER LEGAL PROCEEDING ARISING OUT OF, UNDER, OR RELATING TO THIS AGREEMENT, OR ANY TRANSACTION CONTEMPLATED HEREBY. THIS WAIVER APPLIES TO ANY ACTION OR LEGAL PROCEEDING, WHETHER IN CONTRACT, TORT OR OTHERWISE.

26. CAPTIONS. The captions in this Agreement are for reference purposes only and shall not affect the interpretation of the provisions hereof.

27. ENFORCEABILITY. The Parties desire that the rights and obligations set forth herein be enforced to the maximum extent permitted by Applicable Law. If any provision of this Agreement or its application to either Party or circumstance is held invalid, illegal or unenforceable to any extent, the remainder of this Agreement and the application of that provision to the other Party or to other circumstances is not affected and is to be enforced to the fullest extent permitted by Applicable Law, provided that such enforcement does not materially change the underlying business arrangement.

28. NO WAIVER. It is understood and agreed that any delay, waiver, or omission by a Party to exercise any right arising from any breach or default by the other Party of any of the terms of this Agreement, shall not be construed to be a waiver by such Party of any subsequent breach or default by the other Party.

29. ENTIRE AGREEMENT. This Agreement including the Schedules (each of which is incorporated into and made a part of this Agreement), constitutes the entire agreement between the Parties hereto with respect to the provision of Electric Service to

Customer, and all prior agreements with respect to the same are hereby superseded including, without limitation, any letter(s) of agreement or term sheet(s). The Construction Agreement is a separate, independent agreement that shall not be superseded by this Agreement.

30. NOTICES. All notices pertaining to this Agreement shall be in writing and directed to the following individuals for their respective organizations, provided however that any Party may change the individuals designated to receive written notice by providing written notice of such change to the other Party:

For Customer:		With a copy to:	
Name:	Click here to enter Customer's Name	Name:	Click here to enter Customer's Name
Address:	Click here to enter Customer's address	Address:	Click here to enter Customer's address
Email:	Click here to enter Customer's email address	Email:	Click here to enter Customer's email address

For PPL EU:		With a copy to:	
Name:	Interconnection Affairs	Name:	Office of General Counsel
Address:	PPL Electric Utilities 827 Hausman Road Allentown, PA 18104	Address:	PPL Services Corporation 645 Hamilton St. Suite 700 Allentown, PA 18101
Email:	jblookup@pplweb.com	Email:	jrjankowski@pplweb.com

All notices under this Section shall be delivered in person to the receiving Party or shall be sent via email and reputable next business day express courier service. Any notice so given personally shall be deemed to have been served on delivery, and any notice so given by email and express courier service shall be deemed to have been served the next Business Day after the same shall have been delivered by email and express courier.

31. SURVIVAL. All terms, conditions, and obligations under this Agreement that, by their terms, would reasonably be expected to be performed after expiration or termination of this Agreement, shall survive such expiration or termination, whether or not expressly stated, including, without limitation, any terms, conditions, or obligations for or relating to indemnification(s), waiver(s), release(s), payment(s), construction obligations to be performed after this Agreement terminates or expires, Credit Support rights, and any applicable Tariff provisions.

32. COUNTERPARTS; ELECTRONIC SIGNATURES. This Agreement may be executed in one or more counterparts, with the same effect as if the Parties had signed the same document. Each counterpart so executed shall be deemed to be an original, and all such counterparts shall be construed together and shall constitute one Agreement. Each Party agrees that the electronic signatures of the Parties included in this Agreement are intended to authenticate this writing and to have the same force and effect as manual signatures. An electronic signature means any electronic sound, symbol, or process attached to or logically associated with a record and executed and adopted by a party

with the intent to sign such record pursuant to the Pennsylvania Uniform Electronic Transactions Act (73 Pa. Stat. Ann. § 2260.101 et seq.), as amended from time to time.

33. DISPUTES. If at any time any question, dispute, or difference shall arise between the Parties in relation to, or in connection with, this Agreement, the Parties shall endeavor to resolve the same amicably through negotiations undertaken in good faith, with representatives with decision-making authority regarding such question, dispute, or difference, for a period of ten (10) days after the aggrieved Party notifies the other Party of such dispute. In the event such question, dispute, or difference is not resolved within such ten (10) day period, the Parties shall have the right to exercise any remedies available under this Agreement, at law, or in equity. In no event shall this Section be construed to waive either Party's right to take, or omit to take, any action or to exercise any rights or remedies under, or arising out of, this Agreement, at law, or in equity.

34. CUSTOMER ON-SITE GENERATION AND STORAGE. If elected, Customer may deploy on-site generation and storage methods to serve its electric service needs, which may include, but are not limited to, arrangements for behind the meter generation and battery storage; provided such arrangements are in accordance with the Tariff and all Applicable Laws.

35. TAXES. PPL EU may charge, and Customer shall pay, applicable Taxes in connection with this Agreement.

36. DEFINITIONS. Capitalized terms used in this Agreement but not otherwise defined shall have the following meanings:

a. "**Applicable Laws**" means applicable federal, state, county, and municipal laws, statutes, ordinances, resolutions, rules, and regulations relating to the Parties or this Agreement, including the supply of electric service hereunder and the use of equipment and materials required therefor.

b. "**Authorizations**" means approvals, consents, licenses, Permits, filings, registrations, waivers, actions, or other authorizations.

c. "**Bankrupt**" or "**Bankruptcy**" means, with respect to any entity, such entity: (i) voluntarily files a petition or otherwise commences, authorizes, or acquiesces in the commencement of a proceeding or cause of action under any bankruptcy, insolvency, reorganization, or similar law, or has any such petition filed or commenced against it by its creditors and such petition is not dismissed within sixty (60) calendar days of the filing or commencement, (ii) makes an assignment or any general arrangement for the benefit of creditors, (iii) otherwise becomes insolvent, however evidenced, (iv) has a liquidator, administrator, receiver, trustee, conservator, or similar official appointed with respect to it or any substantial portion of its property or assets, or (v) is generally unable to pay its debts as they fall due.

d. "**Business Day**" shall mean any day on which PPL EU's corporate offices are open for business and commercial banks are not authorized or required to close in New York, New York.

e. "**Cash and Cash Equivalent Collateral**" means all cash and cash equivalents received by PPL EU as Credit Support under this Agreement, and all interest

and other payments and distributions of cash or other property with respect thereto, and any and all proceeds resulting therefrom or from the disposition or liquidation thereof.

f. "**Claims**" mean any and all liability, claims, demands, suits, allegations, or causes of action, whether at law or in equity, and whether based on statute, regulation, rule, ordinance, code, standard or common law, or theories of contract, tort, strict liability, or otherwise, and any losses, costs, damages, injuries, liabilities, penalties, and interest, including reasonable legal fees and expenses, suffered or incurred as a result thereof.

g. "**Contract Capacity**" means the aggregate load set forth in **Schedule A**.

h. "**Contract Year**" means each successive twelve (12) month period commencing on the In-Service Date.

i. "**Credit Rating**" means, with respect to any entity, the rating then assigned to such entity's unsecured, senior long-term debt obligations (not supported by third party credit enhancements) or, if such entity does not have a rating for its senior unsecured long-term debt obligations, then the "Credit Rating" will be the entity's issuer credit rating assigned by S&P or Moody's.

j. "**Credit Support**" means either cash or Letter(s) of Credit in the Credit Support Amount and/or, subject to PPL EU's prior written approval, a Guaranty.

k. "**Credit Support Amount**" means the aggregate dollar amount set forth in **Schedule B-1**.

l. "**Customer Scope of Work**" means the work to be performed by the Customer as described in **Schedule C**.

m. "**Disconnection Facilities**" means the disconnection facilities shown in the One Line Diagram in **Schedule D.**

n. "**Electric Service Commitment**" means Customer's obligation to pay to PPL EU during the Term, in exchange for Electric Service, aggregate Transmission Service Charges that are at least equal to the total Rate Base Expenses.

o. "**Force Majeure Event**" means a cause or event that is beyond the affected Party's reasonable control including, without limitation: acts of civil or military authority (including courts and regulatory agencies), acts of nature or weather, war, riot, terrorism, insurrection, blockades, embargoes, sabotage, epidemics, floods, or the acts or omissions of PJM or other unaffiliated third parties. Notwithstanding the foregoing, a Party's economic hardship, including any inability or failure to pay money or raise financing, or changes in market conditions, including costs, prices, or wage rates shall not be a Force Majeure Event.

p. "**Good Utility Practice**" means any of the practices, methods, and acts engaged in or approved by a significant portion of the electric utility industry during the relevant time period, or any of the practices, methods, and acts which, in the exercise of reasonable judgment in light of the facts known at the time the decision was made,

could have been expected to accomplish the desired result at a reasonable cost consistent with good business practices, reliability, safety, and expedition. "Good Utility Practice" is not intended to be limited to the optimum practice, method, or act to the exclusion of all others, but rather is intended to include acceptable practices, methods, or acts generally accepted in the region and the electric utility industry.

q. "**Guaranty**" means a written guarantee, issued by a U.S. guarantor or foreign guarantor that agrees to additional U.S.-based provisions, in each case, as acceptable to PPL EU, in the form provided for in **Schedule E**, pursuant to which such guarantor unconditionally and irrevocably guarantees the due and punctual performance of all obligations, covenants, and liabilities of Customer under this Agreement.

r. "**In-Service Date**" means the date that PPL EU has completed the PPL EU Scope of Work (as defined in the Construction Agreement) and PPL EU is otherwise ready to place the Customer Facility in service at approximately Choose an item. Volts.

s. "**Letter of Credit**" means an irrevocable standby letter of credit issued and maintained by a Qualified Institution in the form provided for in **Schedule B.**

t. "**Minimum Contract Capacity**" means (i) eighty percent (80%) of the monthly Contract Capacity during the period beginning on the In-Service Date and continuing until the later of (x) the date that PPL EU has received payment in full of the Electric Service Commitment, or (y) expiration of the fifth (5th) Contract Year, and (ii) fifty percent (50%) of the monthly Contract Capacity commencing upon expiration of the period described in subsection (i) above and continuing throughout the remainder of the Term.

u. "**Minimum Credit Support Amount**" means two (2) times the monthly amount that the Customer would be required to pay for Electric Service for the full Contract Capacity.

v. "**Operating Instruction**" means a mutually agreed upon operating instruction maintained on file with the PPL EU Transmission Control Center.

w. "**Permit**" means permits, licenses, rights of way, easements, or other authorizations required from any applicable governmental authority or other third party.

x. "**PJM**" means PJM Interconnection, L.L.C. or any affiliate or successor thereof, including any successor regional transmission organization.

y. "**Qualified Institution**" means a major U.S. commercial bank or foreign bank with a U.S. branch office having an asset base of at least $10 billion, with such bank having a Credit Rating of at least "A-" by S&P and "A3" by Moody's (which Qualified Institution shall not be the Customer or any affiliate of the Customer).

z. "**Service Point**" means the point where PPL EU's overhead service conductors (cable-to-flat terminal connector) terminate on the line side terminals of Customer's primary disconnect switch.

aa. "**Taxes**" means national, state, or local sales or use taxes, or value added taxes that PPL EU is legally obligated to charge.

bb. "**Tax Gross-Up**" means the income tax liability associated with the taxation of contributions in aid of construction ("**CIAC**") offset by a credit for the present value of the future tax reduction expected due to tax depreciation of the CIAC.

cc. "**Termination Payment**" means an amount equal to (i) any and all costs and expenses incurred by PPL EU in connection with the termination of Electric Service, the removal and/or relocation of PPL EU's facilities, the safety of persons and property, and the integrity of the electric system, including, without limitation, costs and expenses relating to all labor, engineering, labor additives, right-of-way, supervision, overhead, administration, installation, transportation, employee's, materials, removal and/or relocation, and the like, and (ii) if termination occurs prior to Customer satisfying its Electric Service Commitment, the Unsatisfied Electric Service Commitment.

dd. "**Transmission Service Charge**" means (as applicable) either (i) the Transmission Service Charge defined in the Tariff when Customer is purchasing energy via the Basic Utility Supply Service, or (ii) the applicable PJM NITS Rate when Customer is purchasing energy via a competitive electric generation supplier.

ee. "**Unsatisfied Electric Service Commitment**" means (i) the difference between the total Rate Base Expenses and the aggregate Transmission Service Charges received by PPL EU from Customer under this Agreement ("**Remaining Rate Base Expenses**"), and (ii) the Tax Gross-Up applicable to the Remaining Rate Base Expenses as calculated under subsection (i) above.

[SIGNATURE PAGE FOLLOWS]

IN WITNESS HEREOF, the Parties have executed this Agreement for Large Load Electric Service, as of the date first above written, by their duly authorized representatives.

Click here to enter Customer's name

By: _____

Name: _____

Title: _____

Date: _____

PPL ELECTRIC UTILITIES CORPORATION

By: _____

Name: _____

Title: _____

Date: _____

SCHEDULE A
TO AGREEMENT FOR LARGE LOAD ELECTRIC SERVICE

ELECTRIC SERVICE COMMITMENT AND CONTRACT CAPACITY

[Attach Schedule* showing:

1. Electric Service Commitment: required monthly and aggregate load/Contract Capacity required for Customer to pay to PPL EU aggregate Transmission Service Charges that are at least equal to the total Rate Base Expenses (i.e., all expenses incurred by PPL EU for construction work under the CSA that will be included in the rate base) during the Initial Term

2. "Minimum Contract Capacity" for minimum revenue commitment: column showing eighty percent (80%) of the required monthly and aggregate load/Contract Capacity.

*schedule will initially include estimated Rate Base Expenses, and Schedule will be updated upon determination of actual Rate Base Expenses]

SCHEDULE B
TO AGREEMENT FOR LARGE LOAD ELECTRIC SERVICE

LETTER OF CREDIT FORM

CREDIT SUPPORT FORM (EVERGREEN)
(ELECTRONIC "eUCP CREDIT")

{TO BE ISSUED ON THE LETTERHEAD OF THE ISSUING BANK}

IRREVOCABLE STANDBY LETTER OF CREDIT NO.

ISSUE DATE _____ **EXPIRY DATE**: _____

APPLICANT

[NAME]

[ADDRESS]

BENEFICIARY
PPL ELECTRIC UTILITIES CORPORATION
C/O PPL SERVICES CORPORATION
2701 EASTPOINT PARKWAY
LOUISVILLE, KY 40223
ATTN: MANAGER, CREDIT AND CONTRACT ADMINISTRATION

ELECTRONIC ISSUE ADDRESS: PPLMARGINCALL2@PPLWEB.COM

CURRENCY AMOUNT
USD *********$ _____

WE (THE "ISSUER") HEREBY ISSUE IN YOUR FAVOR OUR IRREVOCABLE STANDBY LETTER OF CREDIT NO: _____ (THE "LETTER OF CREDIT," WHICH SHALL BE AN "eUCP CREDIT") FOR THE ACCOUNT OF APPLICANT FOR AN AMOUNT OR AMOUNTS NOT TO EXCEED IN THE AGGREGATE US DOLLARS _____ AVAILABLE BY YOUR DRAFT(S) AT SIGHT AT OUR COUNTERS LOCATED AT [INSERT ISSUER'S PLACE FOR PRESENTATION], EFFECTIVE _____ AND EXPIRING ON _____ AT 5:00 PM NEW YORK, NEW YORK TIME OR ANY AUTOMATICALLY EXTENDED EXPIRY DATE, AS PROVIDED HEREIN. THIS LETTER OF CREDIT IS AVAILABLE IN ONE OR MORE DRAFTS UP TO THE AGGREGATE AMOUNT SET FORTH HEREIN.

THIS LETTER OF CREDIT IS PRESENTABLE AND PAYABLE AT OUR COUNTERS AS AN eUCP CREDIT, AND WE HEREBY ENGAGE WITH YOU THAT DRAFTS DRAWN UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS LETTER OF CREDIT WILL BE HONORED ON PRESENTATION, IF ACCOMPANIED BY THE REQUIRED DOCUMENTS PURSUANT TO THE TERMS OF THIS LETTER OF CREDIT.

THIS ORIGINAL LETTER OF CREDIT HAS BEEN ISSUED VIA ELECTRONIC MEANS ONLY TO PPLMARGINCALL2@PPLWEB.COM. WE CONFIRM THAT THE ELECTRONIC PDF FILE OF THIS LETTER OF CREDIT (TOGETHER WITH ELECTRONIC PDF FILES OF SUBSEQUENT AMENDMENTS, IF ANY) SERVES AS THE OPERATIVE INSTRUMENT, AND THAT THE BENEFICIARY MAY USE THE ELECTRONIC PDF FILE OF THE LETTER OF CREDIT (TOGETHER WITH ELECTRONIC PDF FILES OF

SUBSEQUENT AMENDMENTS, IF ANY) AS IT WOULD A HARD COPY ORIGINAL.

DRAFTS, DOCUMENTS AND OTHER COMMUNICATIONS HEREUNDER MAY BE PRESENTED OR DELIVERED TO US BY EMAIL OR BY ANY OTHER ELECTRONIC MEANS. PRESENTATION OR DELIVERY BY EMAIL MUST BE MADE FROM YOUR EMAIL ADDRESS: PPLMARGINCALL2@PPLWEB.COM TO THE FOLLOWING ISSUER EMAIL ADDRESS: [INSERT ISSUER EMAIL ADDRESS], AND CONFIRMED BY TELEPHONE TO US AT ONE OF THE FOLLOWING NUMBER(S): ____ OR ____ [INSERT PHONE NUMBERS FOR CONFIRMATION]. IN THE EVENT OF A PRESENTATION BY EMAIL OR BY OTHER ELECTRONIC MEANS, NO REGULAR MAIL PRESENTATION OR DELIVERY IS NECESSARY, AND THE TRANSMISSION BY EMAIL OR BY OTHER ELECTRONIC MEANS WILL CONSTITUTE CONFORMING PRESENTATION OR DELIVERY.

THE BELOW MENTIONED DOCUMENT(S) MUST BE PRESENTED ON OR BEFORE THE EXPIRY DATE OR ANY AUTOMATICALLY EXTENDED EXPIRY DATE, AS PROVIDED HEREIN, OF THIS INSTRUMENT IN ACCORDANCE WITH THE TERMS AND CONDITIONS OF THIS LETTER OF CREDIT.

REFERENCES MADE HEREIN, OR IN ANY DRAWING OR CORRESPONDENCE DOCUMENTS HEREUNDER, TO THE [INSERT NAME OF AGREEMENT] DATED [INSERT DATE OF SUCH AGREEMENT] BETWEEN PPL ELECTRIC UTILITIES CORPORATION AND APPLICANT, OR AN AFFILIATE OF APPLICANT, SHALL INCLUDE SUCH RELATED EXHIBITS, ATTACHMENTS, SCHEDULES, TARIFFS, PROCEDURES AND OTHER CONTRACTS ENTERED INTO PURSUANT TO OR IN CONNECTION WITH THE AFOREMENTIONED AGREEMENT, ALL AS SUCH ITEMS MAY AMENDED, SUPPLEMENTED, REPLACED OR SUBSTITUTED FROM TIME TO TIME

1. YOUR SIGNED STATEMENT, READING AS FOLLOWS (WITH BLANKS APPROPRIATELY COMPLETED AND BRACKETED INSTRUCTIONS DELETED):

> "THE AMOUNT FOR THIS DRAWING, USD [INSERT AMOUNT], BEING MADE UNDER THE [INSERT NAME OF BANK] IRREVOCABLE STANDBY LETTER OF CREDIT NO. [INSERT LETTER OF CREDIT REFERENCE NUMBER], REPRESENTS AN AMOUNT DUE AND PAYABLE TO BENEFICIARY FROM APPLICANT OR AN AFFILIATE OF APPLICANT UNDER THE PPL ELECTRIC UTILITIES CORPORATION [INSERT NAME OF AGREEMENT] DATED [INSERT DATE OF SUCH AGREEMENT] BETWEEN APPLICANT OR AN AFFILIATE OF APPLICANT AND BENEFICIARY, AND THIS STATEMENT SHALL BE THE NOTICE OF COMPLETENESS FOR THIS PRESENTATION UNDER THE ABOVE-REFERENCED LETTER OF CREDIT."; OR
>
> "AN EVENT OF DEFAULT UNDER THE PPL ELECTRIC UTILITIES CORPORATION [INSERT NAME OF AGREEMENT] DATED [INSERT DATE OF SUCH AGREEMENT] BETWEEN APPLICANT OR AN AFFILIATE OF APPLICANT AND BENEFICIARY HAS OCCURRED AND THAT BENEFICIARY DEMANDS PAYMENT IN THE AMOUNT OF [INSERT AMOUNT UP TO ENTIRE REMAINING UNDRAWN AMOUNT] PURSUANT TO SUCH AGREEMENT, AND THIS STATEMENT SHALL BE THE NOTICE OF COMPLETENESS FOR THIS PRESENTATION UNDER THE ABOVE-REFERENCED LETTER OF CREDIT.";
>
> "THE EXPIRY DATE OF IRREVOCABLE STANDBY LETTER OF CREDIT NO. [INSERT LETTER OF CREDIT REFERENCE NUMBER] IS LESS THAN THIRTY (30) DAYS FROM THE DATE OF THIS STATEMENT AND THAT THE APPLICANT UNDER SUCH LETTER OF CREDIT HAS FAILED TO PROVIDE A REPLACEMENT LETTER OF CREDIT THAT SATISFIES THE REQUIREMENTS UNDER THE PPL ELECTRIC UTILITIES CORPORATION [INSERT NAME OF AGREEMENT] DATED ____ BETWEEN APPLICANT OR AN AFFILIATE OF APPLICANT AND BENEFICIARY. WE THEREFORE DEMAND PAYMENT IN THE AMOUNT OF [INSERT AMOUNT UP TO ENTIRE REMAINING

UNDRAWN AMOUNT] PURSUANT TO SUCH AGREEMENT, AND THIS STATEMENT SHALL BE THE NOTICE OF COMPLETENESS FOR THIS PRESENTATION UNDER THE ABOVE-REFERENCED LETTER OF CREDIT."; OR

"WE HAVE PROVIDED WRITTEN NOTICE TO THE APPLICANT OR AN AFFILATE OF APPLICANT THAT THE ISSUER OF IRREVOCABLE STANDBY LETTER OF CREDIT NO. [INSERT LETTER OF CREDIT REFERENCE NUMBER] HAS OR HAS HAD ASSETS BELOW TEN BILLION U.S. DOLLARS OR A CREDIT RATING BELOW A- BY S&P OR A3 BY MOODYS OR OTHERWISE FAILS TO MEET REQUIREMENTS UNDER THE PPL ELECTRIC UTILITIES CORPORATION [INSERT NAME OF AGREEMENT] AND THE APPLICANT OR AN AFFILIATE OF APPLICANT HAS FAILED TO PROVIDE A REPLACEMENT LETTER OF CREDIT OR OTHER SECURITY ACCEPTABLE TO BENEFICIARY. WE THEREFORE DEMAND PAYMENT IN THE AMOUNT OF [INSERT AMOUNT UP TO ENTIRE REMAINING UNDRAWN AMOUNT], AND THIS STATEMENT SHALL BE THE NOTICE OF COMPLETENESS FOR THIS PRESENTATION UNDER THE ABOVE-REFERENCED LETTER OF CREDIT."

2. A COPY OR ORIGINAL OF THIS LETTER OF CREDIT AND ANY AMENDMENT(S).

AT THE BENEFICIARY'S REQUEST PRIOR TO THE EXPIRY DATE, THE ISSUER WILL ISSUE TO THE BENEFICIARY A REPLACEMENT LETTER OF CREDIT (HAVING THE SAME TERMS AND CONDITIONS AS THIS LETTER OF CREDIT AND ANY AMENDMENTS HERETO) IF THE BENEFICIARY CERTIFIES TO THE ISSUER THAT THE ORIGINAL LETTER OF CREDIT HAS BEEN LOST, STOLEN, DESTROYED OR MUTILATED AND PROVIDES THE ISSUER WITH A REASONABLY ACCEPTABLE INDEMNITY.

PARTIAL AND MULTIPLE DRAWINGS ARE PERMITTED. IN THE EVENT OF ANY PARTIAL DRAWING WE WILL, PROMPTLY FOLLOWING PRESENTATION THEREOF, RETURN THE ORIGINAL LETTER OF CREDIT AND ALL AMENDMENTS TO YOU. ALL AMOUNTS PAID BY US TO BENEFICIARY IN COMPLIANCE WITH THIS LETTER OF CREDIT SHALL CONSTITUTE A PRO TANTO REDUCTION IN THE STATED AMOUNT OF THIS LETTER OF CREDIT.

IF PRESENTATION OF ANY DRAWING IS MADE ON A BUSINESS DAY (AS HEREIN DEFINED) AND SUCH PRESENTATION IS MADE ON OR BEFORE 11:00 A.M. NEW YORK TIME, ISSUER SHALL SATISFY SUCH DRAWING REQUEST ON THE NEXT BUSINESS DAY. IF THE DRAWING IS RECEIVED AFTER 11:00 A.M. NEW YORK TIME, ISSUER WILL SATISFY SUCH DRAWING REQUEST ON THE SECOND FOLLOWING BUSINESS DAY. ALL PAYMENTS MADE UNDER THIS LETTER OF CREDIT SHALL BE MADE BY MEANS OF WIRE TRANSFER IN IMMEDIATELY AVAILABLE UNITED STATES DOLLARS TO YOUR BANK ACCOUNT INDICATED BY BENEFICIARY.

WE HEREBY ENGAGE WITH YOU THAT ALL DOCUMENTS PRESENTED IN COMPLIANCE WITH THE TERMS OF THIS LETTER OF CREDIT WILL BE DULY HONORED IF PRESENTED FOR PAYMENT ON OR BEFORE THE EXPIRY DATE, AS EXTENDED FROM TIME TO TIME IN ACCORDANCE WITH THE TERMS OF THIS LETTER OF CREDIT.

IN THE EVENT OF ANY NON-CONFORMING PRESENTATION, WE SHALL IMMEDIATELY NOTIFY BENEFICIARY BY EMAIL TO PPLMARGINCALL2@PPLWEB.COM THAT THE PRESENTATION HAS BEEN REJECTED, WHICH NOTICE SHALL INDICATE THE REASONS FOR DISHONORING SUCH PRESENTATION AND SHALL PLACE AT THE DISPOSAL OF BENEFICIARY THE DOCUMENTS PRESENTED BY BENEFICIARY IN SUPPORT OF ITS DEMAND FOR PAYMENT. BENEFICIARY MAY THEREAFTER PRESENT DOCUMENTS AND RECEIVE PAYMENT HEREUNDER IN THE EVENT A CONFORMING PRESENTATION IS MADE IN ACCORDANCE WITH THE TERMS OF THIS LETTER OF CREDIT.

IT IS A CONDITION OF THIS LETTER OF CREDIT THAT IT WILL BE AUTOMATICALLY EXTENDED WITHOUT AMENDMENT FOR ONE YEAR FROM THE EXPIRY DATE HEREOF, OR ANY FUTURE

EXPIRY DATE, UNLESS AT LEAST 90 DAYS PRIOR TO ANY EXPIRY DATE WE NOTIFY YOU BY EMAIL TO PPLMARGINCALL2@PPLWEB.COM THAT WE ELECT NOT TO CONSIDER THIS LETTER OF CREDIT RENEWED FOR ANY SUCH PERIOD.

THE TERM "BUSINESS DAY" AS USED HEREIN MEANS ANY DAY OTHER THAN (I) A SATURDAY, (II) A SUNDAY, OR (III) A DAY ON WHICH BANKING INSTITUTIONS LOCATED IN THE CITY OF NEW YORK, NEW YORK ARE REQUIRED OR AUTHORIZED BY LAW TO BE CLOSED.

ADDITIONAL TERMS AND CONDITIONS:

1. ALL COMMISSIONS, FEES, COSTS, AND OTHER BANKING CHARGES WILL BE BORNE BY THE APPLICANT.

2. THIS LETTER OF CREDIT IS SUBJECT TO THE UNIFORM CUSTOMS AND PRACTICE FOR DOCUMENTARY CREDITS, 2007 REVISION - ICC PUBLICATION NO. 600, AS SUPPLEMENTED BY THE eUCP VERSION 2.0, OR ANY SUCCESSOR PUBLICATION THERETO (THE "UCP"). AS TO MATTERS NOT GOVERNED BY THE UCP, THIS LETTER OF CREDIT SHALL BE GOVERNED BY AND CONSTRUED IN ACCORDANCE WITH THE LAWS OF THE [COMMONWEALTH OF PENNSYLVANIA; STATE OF NEW YORK], INCLUDING, TO THE EXTENT NOT INCONSISTENT WITH THE UCP, THE UNIFORM COMMERCIAL CODE AS IN EFFECT IN THE [COMMONWEALTH OF PENNSYLVANIA; STATE OF NEW YORK].

3. ARTICLE 36 OF THE UCP AS IT APPLIES TO THIS LETTER OF CREDIT IS MODIFIED AS FOLLOWS: IF, ON THE LAST BUSINESS DAY FOR PRESENTATION THE PLACE FOR PRESENTATION STATED IN THIS LETTER OF CREDIT IS CLOSED FOR ANY REASON, THEN THE LAST DAY FOR PRESENTATION IS AUTOMATICALLY EXTENDED TO THE DAY THAT IS TEN (10) CALENDAR DAYS AFTER THE PLACE FOR PRESENTATION RE-OPENS OR THE ISSUER NOTIFIES THE BENEFICIARY OF AN ALTERNATIVE PLACE FOR PRESENTATION, WHICH ALTERNATIVE MUST BE IN THE UNITED STATES.

4. EXCEPT FOR AN INCREASE IN AMOUNT AND/OR AN EXTENSION OF EXPIRY, THIS LETTER OF CREDIT MAY NOT BE AMENDED, CHANGED OR MODIFIED WITHOUT THE EXPRESS WRITTEN CONSENT OF THE BENEFICIARY AND THE ISSUER.

5. THE BENEFICIARY SHALL NOT BE DEEMED TO HAVE WAIVED ANY RIGHTS UNDER THIS LETTER OF CREDIT, UNLESS, AND THEN ONLY TO THE EXTENT THAT, THE BENEFICIARY OR AN AUTHORIZED AGENT OF THE BENEFICIARY SHALL HAVE SIGNED A DATED WRITTEN WAIVER EXPRESSLY WAIVING SUCH RIGHT OR RIGHTS. NO SUCH WAIVER, UNLESS EXPRESSLY SO STATED THEREIN, SHALL BE EFFECTIVE AS TO ANY TRANSACTION THAT OCCURS SUBSEQUENT TO THE DATE OF THE WAIVER, NOR AS TO ANY CONTINUANCE OF ANY BREACH OR NON-COMPLIANCE AFTER THE WAIVER.

6. A FAILURE TO MAKE ANY DRAWINGS AT ANY TIME SHALL NOT IMPAIR OR REDUCE THE AVAILABILITY OF THIS LETTER OF CREDIT IN ANY SUBSEQUENT PERIOD OR OUR OBLIGATION TO HONOR ANY SUBSEQUENT DEMAND OR DEMANDS FOR PAYMENT MADE IN ACCORDANCE WITH THE TERMS OF THIS LETTER OF CREDIT.

AUTHORIZED SIGNATURE:_____

TITLE: _____

PLEASE DIRECT ANY CORRESPONDENCE (OTHER THAN DRAFTS, DOCUMENTS OR OTHER COMMUNICATIONS REGARDING PRESENTMENT OR NOTICES REGARDING REJECTION OR NON-RENEWAL) TO:

[BANK NAME, EMAIL ADDRESS AND PHONE NUMBER]

SCHEDULE B-1
TO AGREEMENT FOR LARGE LOAD ELECTRIC SERVICE

CREDIT SUPPORT AMOUNT

The required Credit Support Amount as of the Effective Date is $_____.*

Commencing as of the second (2nd) Contract Year, Customer may reduce the Credit Support Amount to the then current amount of the Electric Service Commitment provided, however that (i) Customer is not, and has not been, in breach or default under this Agreement, and (ii) the Credit Support Amount shall not, in any event, be reduced below the Minimum Credit Support Amount.

The required Credit Support Amount is subject to modification, at PPL EU's written request, if **Schedule A is revised pursuant to **Section 4** of this Agreement.*

SCHEDULE C
TO AGREEMENT FOR LARGE LOAD ELECTRIC SERVICE

CUSTOMER SCOPE OF WORK

The Customer Scope of Work includes the following:

[**Note**: Describe all work to be performed by Customer, at Customer's cost, under Section 7(a) of this Agreement as required for PPL EU to provide Electric Service to Customer; if there is none, do not remove this Schedule but insert "None"]

SCHEDULE D
TO AGREEMENT FOR LARGE LOAD ELECTRIC SERVICE

ONE LINE DIAGRAM

[Note: Diagram must include:
1. Service Point (i.e. point where PPL EU's overhead service conductors [cable-to-flat terminal connector] terminate on the line side terminals of Customer's primary disconnect switch;
2. Disconnection facilities; and
3. Any required Method of Supply Letter requirements (Method of Supply Letter will not be attached or included in this Agreement)]

SCHEDULE E
TO AGREEMENT FOR LARGE LOAD ELECTRIC SERVICE

FORM OF GUARANTY[1]

UNCONDITIONAL GUARANTY*

THIS GUARANTY AGREEMENT (this "Guaranty") is made and entered into as of this _____ day of _____, by _____ (the "Guarantor"), with an address at _____, in favor of PPL Electric Utilities Corporation (the "PPL EU"), with an address at 827 Hausman Rd., 1st Floor, Allentown, PA 18104, in consideration of entering into and benefitting from the Agreement for Large Load Electric Service dated on or about _____, 20__ ("ESA") and the Agreement for Construction of Large Load Electric Service Facilities dated on or about _____, 20__ ("CSA" and, with the ESA, collectively or individually, as the case may be, the "Agreement(s)") between PPL Electric Utilities Corporation and _____ (the "Customer").

Unless otherwise defined herein, all capitalized terms used herein shall have the respective meanings assigned thereto in the applicable Agreement(s). References to the Agreement(s) shall include (i) applicable tariffs, procedures or contracts relating to the Agreement(s), and (ii) exhibits, schedules, and attachments, to such or to the Agreement(s), in each case, as such items or Agreement(s) may be amended, supplemented, replaced or substituted, from time-to-time.

Whereas, Customer is an affiliate of Guarantor, and Guarantor will directly or indirectly benefit from and desires PPL EU to enter into the Agreement(s) with Customer and Guarantor's provision of this Guaranty is an inducement for PPL EU to be willing to enter into the Agreement(s) with Customer.

Now, therefore, intending to be legally bound hereby, Guarantor covenants and agrees as follows:

1. Guaranty of Obligations.

(a) The Guarantor hereby irrevocably and unconditionally guarantees as primary obligor and not as a surety, with effect from date hereof, the prompt and complete payment in immediately available funds in the United States when due of all of Customer's obligations (present or future, direct or indirect, secured or unsecured, fixed or contingent and whenever due, whether on scheduled payment dates, upon demand, breach, default, indemnity, non-performance, termination or otherwise) under the Agreement(s), as well as, all reasonable out-of-pocket costs and expenses incurred by PPL EU in the enforcement of the Guarantor's obligations or collection under this Guaranty, including reasonable attorney's fees and expenses (collectively, the "Obligations") provided only, solely with respect to costs and expenses of enforcement, that PPL EU is the prevailing party in any judicial suit, action or proceeding arising out of, resulting from, or in any way relating to this Guaranty, or if by mutual agreement by Guarantor and PPL EU. [**Optional provision**: Notwithstanding anything to the contrary herein, the liability of the Guarantor under this Guaranty and PPL EU's right of recovery hereunder for all Obligations is limited to a total aggregate amount of _____ US Dollars $_____

[1] Additional provisions and documentation will be required by PPL EU, in its discretion, in cases of a non-U.S. guarantor

("Guaranty Amount"), where Guaranty Amount shall be no less than Five Hundred Thousand US Dollars ($500,000).]

(b) The Guarantor shall not be required to pay any consequential, incidental, punitive, exemplary or indirect damages, lost profits or other business interruption damages except in each case to the extent that they constitute Obligations that are required to be paid under the applicable Agreement(s).

2. Nature of Guaranty; Waivers.

(a) This is a guaranty of payment and not of collection and PPL EU shall not be required, as a condition of the Guarantor's liability, to proceed first against Customer, or any performance assurance or any collateral that Guarantor may hold, or to pursue any rights which may be available to it with respect to any other person or entity who may be liable for the payment of the Obligations. This is not a guaranty of performance (other than of performance of payment obligations).

(b) This Guaranty is an absolute, unconditional, irrevocable (subject to the provisions of Section 12 of this Guaranty) and continuing guaranty and will remain in full force and effect until all of the Obligations have been indefeasibly paid in full, or until the Agreement(s) have been terminated, whichever comes later. This Guaranty will not be affected by any surrender, exchange, acceptance, compromise or release by PPL EU or any other party, or any other guaranty, performance assurance or other security held by it for any of the Obligations, by any failure of PPL EU to take any steps to perfect or maintain its lien or security interest in or to preserve its rights to any security, performance assurance, or other collateral for any of the Obligations or any guaranty, or by any irregularity, unenforceability or invalidity of any of the Obligations or any part thereof.

(c) Except as to any claims or defenses, or rights of withholding or set-off, to which Customer is entitled under the Agreement(s) (and exclusive of any claims, defenses, and rights that are based upon (x) the insolvency, bankruptcy, assignment for creditors, reorganization, liquidation or similar of Customer, (y) ultra vires, lack of due formation, existence or good standing of Customer, or (z) the lack of power or authority of Customer to enter into and perform under the Agreement(s), all of which are expressly waived by Guarantor under this Guaranty), the Guarantor's obligations hereunder shall not be affected, discharged, modified or impaired by any counterclaim, set-off, deduction or defense based upon any claim the Guarantor may have against Customer or PPL EU, including: (i) any change in the corporate existence (including its charter or other governing agreement, laws, rules, regulations or powers), structure or ownership of Customer or the Guarantor; or (ii) any insolvency, bankruptcy, reorganization or other similar proceeding affecting Customer or its assets; or (iii) the invalidity or unenforceability in whole or in part of the Agreement(s); or (iv) any provision of applicable law or regulations purporting to prohibit payment by Customer of amounts to be paid by it under the Agreement(s) (other than any law or regulation that eliminates or nullifies the obligations under the Agreement(s) which is not otherwise waived hereunder or in the Agreement(s)).

(d) Guarantor waives notice of acceptance of this Guaranty, diligence, presentment, notice of dishonor and protest and any requirement that at any time PPL EU or any

other person or entity exhaust any right to take any action against Customer or Customer's assets or any other guarantor, person or entity, and PPL EU shall not be bound or obligated to exhaust its recourse against Customer or any other person or entity or against any performance assurance or other collateral it may hold or take any other action before being entitled to receive payment from Guarantor. Any failure of PPL EU to give notice shall not discharge, alter or diminish in any way Guarantor's obligations under this Guaranty. The Guarantor waives all claims, defenses, and rights of set-off based on suretyship or impairment of collateral or any other defenses that would constitute a legal or equitable discharge of Guarantor's obligations, except any claims, defenses, or rights of set-off of Customer in respect of its obligations under the Agreement(s) that are expressly reserved under Section 2(c) above.

(e) PPL EU at any time and from time to time, without notice to or the consent of the Guarantor, and without impairing or releasing, discharging or modifying the Guarantor's liabilities hereunder, may (i) to the extent permitted by the Agreement(s), change the manner, place, time or terms of payment or performance of, or other terms relating to, any of the Obligations; (ii) to the extent permitted by the Agreement(s), renew, substitute, modify, amend or alter, or grant consents or waivers relating to any of the Obligations, or any other guaranties for any Obligations; (iii) settle, compromise or deal with any other person, including Customer, with respect to any Obligations in such manner as PPL EU deems appropriate at its reasonable discretion; (iv) substitute, exchange or release any performance assurance or any guaranty; or (v) take such actions and exercise such remedies hereunder or under the Agreement(s) as PPL EU deems appropriate in its reasonable discretion.

3. Representations and Warranties. The Guarantor hereby represents and warrants that:

(a) it is a [limited liability company, corporation, limited partnership, general partnership] duly organized, validly existing and in good standing under the laws of the jurisdiction of its [formation, organization, incorporation] and has the [corporate power] [power] and authority to conduct the business in which it is currently engaged and enter into and perform its obligations under this Guaranty;

(b) it has the [corporate power] [power] and authority and the legal right to execute and deliver, and to perform its obligations under, this Guaranty, and has taken all necessary [corporate action] [action] to authorize its execution, delivery and performance of this Guaranty;

(c) this Guaranty constitutes a legal, valid and binding obligation of the Guarantor enforceable in accordance with its terms, subject to applicable bankruptcy, reorganization, insolvency, moratorium or similar laws affecting creditors' rights generally and subject, as to enforceability, to equitable principles of general application (regardless of whether enforcement is sought in a proceeding in equity or at law);

(d) the execution, delivery and performance of this Guaranty will not violate any provision of any requirement of law or contractual obligation of the Guarantor;

(e) no consent or authorization of, filing with, or other act by or in respect of, any

arbitrator or governmental authority and no consent of any other person (including, without limitation, any stockholder or creditor of the Guarantor) is required in connection with the execution, delivery, performance, validity or enforceability of this Guaranty, other than any which have been obtained or made prior to the date hereof and remain in full force and effect; and

(f) no litigation, investigation or proceeding of or before any arbitrator or governmental authority is pending or, to the knowledge of the Guarantor, threatened by or against the Guarantor that could reasonably be expected to have a material adverse effect on this Guaranty or Guarantor's ability to perform all of its obligations hereunder.

4. Repayments or Recovery from PPL EU. If any demand is made at any time upon PPL EU for the repayment or recovery of any amount received by it in payment or on account of any of the Obligations, including but not limited to upon the bankruptcy, insolvency, dissolution or reorganization of the Customer and if PPL EU repays all or any part of such amount by reason of any judgment, decree or order of any court or administrative body or by reason of any settlement or compromise of any such demand, the Guarantor shall be and remain liable hereunder for the amount so repaid or recovered to the same extent as if such amount had never been received originally by PPL EU. The provisions of this section will be and remain effective notwithstanding any contrary action which may have been taken by the Guarantor in reliance upon such payment, and any such contrary action so taken will be without prejudice to PPL EU's rights hereunder and will be deemed to have been conditioned upon such payment having become final and irrevocable. Furthermore, this Guaranty shall continue to be effective or be reinstated, as the case may be, without any release or discharge of any obligations if at any time any payment of any of the Obligations is rescinded, avoided, recovered or must otherwise be returned by PPL EU upon the insolvency, bankruptcy, or reorganization of Customer, Guarantor or any other guarantor or any other person or entity or otherwise, all as though such payment had not been made.

5. Enforceability of Obligations. No modification, limitation or discharge of the obligations of Customer arising out of or by virtue of any bankruptcy, reorganization or similar proceeding for relief of debtors under federal or state law will affect, modify, limit or discharge the Guarantor's liability in any manner whatsoever and this Guaranty will remain and continue in full force and effect and will be enforceable against the Guarantor to the same extent and with the same force and effect as if any such proceeding had not been instituted. The Guarantor waives all rights and benefits which might accrue to it by reason of any such proceeding and will be liable to the full extent hereunder, irrespective of any modification, limitation or discharge of the liability of Customer that may result from any such proceeding.

6. Postponement of Subrogation. Guarantor shall not be subrogated to any of the rights (or if subrogated by operation of law, such Guarantor hereby waives such rights to the extent permitted by applicable law) of PPL EU as the result of any payment or enforcement of any of the Obligations until all of the Agreement(s) have terminated and all Obligations (other than contingent indemnities not then due) have been paid in full (such date, the "Obligations Full Payment Date"). If any amount shall be paid to Guarantor on account of subrogation at any time prior to the Obligations Full Payment Date, such amount shall be held by Guarantor in trust for PPL EU, segregated from other funds of Guarantor, and shall, forthwith upon receipt by Guarantor, be turned over to PPL EU in the exact form received

by Guarantor (duly endorsed by Guarantor to PPL EU, if required) to be applied against the Obligations, whether due or to become due, in such order as PPL EU may determine. On the Obligations Full Payment Date, PPL EU agrees that Guarantor shall be subrogated to the rights of PPL EU against Customer to the extent of Guarantor's payments to PPL EU hereunder that have not been rescinded, avoided or otherwise required to be returned.

7. Notices. All notices, demands, requests, consents, approvals and other communications required or permitted hereunder must be in writing and will be effective upon receipt. Such notices and other communications may be hand-delivered, sent by email to the address set forth below and confirmed by telephone to the number set forth below, sent by facsimile transmission with confirmation of delivery and a copy sent by first-class mail, or sent by nationally recognized overnight courier service, to the addresses for the PPL EU and the Guarantor set forth below or to such other address as one may give to the other in writing for such purpose:

All communications to PPL EU shall be directed to:

Attn: Interconnection Affairs
Phone: _____
Fax: _____
Email: _____
Address: PPL Electric Utilities Corporation
827 Hausman Road, Allentown PA 18104
With a required copy to:

Attn: Manager, Credit and Contract Administration
Phone: 502-627-4253
Fax: 502-627-3950
Email: jhearly@pplweb.com
Address: 2701 Eastpoint Parkway Louisville, KY 40223

or such other address as PPL EU shall from time to time specify to Guarantor by notice given in accordance with this Section 7.

All communications to Guarantor shall be directed to:

Attn: _____
Phone: _____
Fax: _____
Email: _____
Address: _____

or such other address as the Guarantor shall from time to time specify to PPL EU by notice given in accordance with this Section 7.

8. Preservation of Rights. No delay or omission on PPL EU's part to exercise any right or power arising hereunder will impair any such right or power or be considered a waiver of any such right or power, nor will PPL EU's action or inaction impair any such right or power. PPL EU's rights and remedies hereunder are cumulative and not exclusive of any other rights or remedies which PPL EU may have under other agreements with the Guarantor or in respect of any performance assurance or at law or in equity.

9. Illegality. In case any one or more of the provisions contained in this Guaranty should be invalid, illegal or unenforceable in any respect, the validity, legality and enforceability of the remaining provisions contained herein shall not in any way be affected or impaired thereby.

10. Amendments. No modification, amendment or waiver of any provision of this Guaranty nor consent to any departure by the Guarantor therefrom, will be effective unless made in a writing signed by PPL EU, and then such waiver or consent shall be effective only in the specific instance and for the purpose for which given. No notice to or demand on the Guarantor in any case will entitle the Guarantor to any other or further notice or demand in the same, similar or other circumstance.

11. Entire Agreement. This Guaranty (including the documents and instruments referred to herein) constitutes the entire statement of the terms of this Guaranty and supersedes all other prior agreements and understandings, both written and oral, between the Guarantor and PPL EU with respect to the subject matter hereof.

12. Successors and Assigns. This Guaranty will be binding upon the successors and permitted assigns of Guarantor and inure to the benefit of PPL EU and its successors and assigns. Guarantor shall not assign this Guaranty in whole or in part without PPL EU's prior written consent. Upon any such delegation and assumption of obligations by a successor Guarantor, the Guarantor shall be relieved of and fully discharged from all of its obligations hereunder, whether such obligations arose before or after the date of such delegation and assumption.

13. Interpretation. In this Guaranty, unless PPL EU and the Guarantor otherwise agree in writing, the singular includes the plural and the plural the singular; references to statutes are to be construed as including all statutory provisions consolidating, amending or replacing the statute referred to; the word "or" shall be deemed to include "and/or", the words "including", "includes" and "include" shall be deemed to be followed by the words "without limitation"; and references to sections or exhibits are to those of this Guaranty unless otherwise indicated. Section headings in this Guaranty are included for convenience of reference only and shall not constitute a part of this Guaranty for any other purpose.

14. Governing Law.

(a) This Guaranty has been delivered to and accepted by PPL EU. THIS GUARANTY SHALL BE GOVERNED BY AND CONSTRUED IN ACCORDANCE WITH THE LAWS OF THE [COMMONWEALTH OF PENNSYLVANIA][STATE OF NEW YORK], EXCLUDING ITS CONFLICT OF LAWS RULES THAT WOULD APPLY THE LAWS OF ANY OTHER JURISDICTION.

(b) The Guarantor hereby irrevocably consents to the non-exclusive jurisdiction of any federal court in the [Commonwealth of Pennsylvania][State of New York], but in the event that the Guarantor and PPL EU jointly determine in good faith that jurisdiction does not lay with such court or that such court refuses to exercise jurisdiction or venue over the Guarantor and PPL EU or any claims made pursuant to this Guaranty, then the Guarantor agrees to submit to the non-exclusive jurisdiction of the [Pennsylvania][New York] State courts; provided that nothing contained in this Guaranty will prevent PPL EU from bringing any action, enforcing

any award or judgment or exercising any rights against the Guarantor individually, against any security or against any property of the Guarantor within any other county, state or other foreign or domestic jurisdiction. The Guarantor acknowledges and agrees that the venue provided above is the most convenient forum for both PPL EU and the Guarantor. The Guarantor waives any objection to venue and any objection based on a more convenient forum in any action instituted under this Guaranty. The Guarantor agrees that a PDF copy of this Guaranty transmitted to PPL EU by electronic means, and maintained by PPL EU in electronic form, shall constitute the original Guaranty and be admissible under the rules of evidence in any regulatory proceeding, or in court or other dispute resolution forum.

15. WAIVER OF JURY TRIAL. THE GUARANTOR AND PPL EU IRREVOCABLY WAIVE ANY AND ALL RIGHT TO A TRIAL BY JURY IN ANY ACTION, PROCEEDING OR CLAIM OF ANY NATURE RELATING TO THIS GUARANTY, ANY DOCUMENTS EXECUTED IN CONNECTION WITH THIS GUARANTY OR ANY TRANSACTION CONTEMPLATED IN ANY OF SUCH DOCUMENTS. THE GUARANTOR AND PPL EU ACKNOWLEDGE THAT THE FOREGOING WAIVER IS KNOWING AND VOLUNTARY.

16. Term. This Guaranty shall survive termination of the Agreement(s) and remain in full force and effect until all amounts due hereunder, including all of the Obligations, have been paid in full.

17. Stay of Acceleration Ineffective with Respect to Guarantor. If acceleration of the time for payment of any amount payable by Customer under the Agreement(s) is stayed upon the insolvency, bankruptcy or reorganization of Customer, all such amounts otherwise subject to acceleration or required to be paid upon an early termination pursuant to the terms of the Agreement(s) shall nonetheless be payable by the Guarantor hereunder on written demand by PPL EU.

18. Severability. Any provision contained in this Guaranty which is prohibited or severability in any jurisdiction shall, as to such jurisdiction, be ineffective to the extent of such prohibition or unenforceability without invalidating the remaining provisions hereof, and any such prohibition or unenforceability in any jurisdiction shall not invalidate or render unenforceable such provision in any other jurisdiction.

19. Electronic Signatures. The electronic signature of Guarantor shall be valid as an original signature of Guarantor and shall be effective to bind Guarantor.

The Guarantor acknowledges that it has read and understood all the provisions of this Guaranty, and has been advised by counsel as necessary or appropriate.

[Guarantor]

By:_____
Name: _____
Title: _____

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 2-R

REBUTTAL TESTIMONY OF KYLE SWARTZENTRUBER

TOPICS ADDRESSED: **ENGINEERING AND DESIGN**
HEALTH AND SAFETY

DATE: AUGUST 7, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Kyle Swartzentruber, and my business address is 827 Hausman Road, Allentown, Pennsylvania 18104.

Q. Did you previously submit testimony in this proceeding on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company")?

A. Yes. On May 13, 2026, I submitted my direct testimony, PPL Electric Statement No. 2, relative to the "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" at Docket No. A-2025-3059443 ("Tomhicken 230 kV Switchyard Project" or the "Project").

Q. What is the purpose of your rebuttal testimony?

A. My testimony responds to certain issues raised by the Office of Consumer Advocate ("OCA") Witness Rao Konidena, by Protestant Erika Cook, and to certain testimony provided at the public input hearings. Specifically, I will respond to testimony provided by Witness Konidena regarding the engineering and design specifications of, alternatives to, and health and safety of the Tomhicken 230 kV Switchyard Project. I will also respond to testimony provided by Ms. Cook and by members of the public regarding the health and safety of the Project.

Q. Are you sponsoring any exhibits associated with your rebuttal testimony?

A. No.

Q. How have you arranged your rebuttal testimony?

A. In Section II, I will respond to testimony regarding the engineering and design specifications of the Tomhicken 230 kV Project. In Section III, I will address testimony regarding alternatives to the Project. In Section IV, I will respond to testimony regarding the health and safety of the Project. Finally, I conclude in Section V.

II. DESIGN AND ENGINEERING CRITERIA

Q. Did any parties specifically contest the design and engineering criteria that are applicable to the Tomhicken 230 kV Switchyard Project?

A. No. However, Mr. Konidena does testify about certain aspects of the design and engineering criteria of the Project in that he confirms that the design and engineering specifications used by the Company are reasonable and acceptable.

Q. Please summarize the portions of Mr. Konidena's testimony in which he confirms that the design and engineering specifications used by the Company are reasonable and acceptable.

A. Specifically, Mr. Konidena states that the Ambient Adjusted Ratings ("AAR") used by the Company in its need determination reflect AAR-compliant values under FERC Order 881, and that the Customer's load could not be accommodated under the normal and emergency AAR of the existing Susquehanna-Harwood double-circuit 230 kV transmission lines. (OCA Statement 2, pp. 17-19.) He also then confirms that the conductors proposed by PPL

Electric as part of the Project will satisfy normal and emergency AAR and ensure N-1 reliability. (OCA Statement 2, pp. 22-23.)

Mr. Konidena also spends several pages of his direct testimony apparently criticizing PPL Electric's decision to utilize a breaker-and-a-half ("BAAH") design as opposed to a ring bus or double breaker-double bus design in its design of the Tomhicken 230 kV Switchyard. (OCA Statement 2, pp. 24-30.) Yet, he ultimately agrees that the utilization of a BAAH design "provides greater operational reliability than a ring bus configuration." (OCA Statement 2, p. 30.)

Q. What can you conclude based off Mr. Konidena's testimony regarding the design and engineering criteria of the Project?

A. Mr. Konidena raises zero concerns regarding the engineering and design of the Project, and does not assert that the design of the proposed HV lines will create an unreasonable risk of danger to the health and safety of the public. Importantly, Mr. Konidena acknowledges that the Company's design of the Project is reasonable and, in fact, utilizes a design of the proposed HV lines that accommodates the Customer's load under normal and emergency circumstances. In addition, Mr. Konidena raises no concerns regarding the design of the towers proposed to be constructed as a part of the Project. Finally, while not focused on the proposed HV line itself, Mr. Konidena also concedes that the BAAH design of the Tomhicken Switchyard provides greater operational reliability than another alternative.

III. PROJECT ALTERNATIVES

Q. Did Mr. Konidena testify about possible alternatives to the Tomhicken 230 kV Switchyard Project?

A. Yes. However, like the testimony noted above regarding the design and engineering criteria for this Project, Mr. Konidena generally concludes that there are not feasible or reasonable engineering alternatives to the Project.

Q. Please summarize Mr. Konidena's testimony.

A. Mr. Konidena evaluated four alternatives to the Project, including Dynamic Line Ratings ("DLR"), Non-Transmission Alternatives ("NTA"), distribution system connection, and direct connection to the proposed Nescopeck 230 kV Switchyard. (OCA Statement 2, p. 32.)

First, with respect to DLRs, Mr. Konidena agreed with PPL Electric's conclusion that connecting Customer load with DLR alone is not a viable alternative, because a physical interconnection requirement exists independently of line ratings, and because DLR is not a valid solution for Transmission Planning load flow analysis. (OCA Statement 2, pp. 33-34.) Next with respect to NTAs, Mr. Konidena agreed that the physical transmission interconnection required by the Project cannot be replaced by NTA technology. (OCA Statement 2, p. 36.) Third, Mr. Konidena agreed with PPL Electric that the Customer load "cannot be served from a 12 kV distribution system," and thus distribution system connection is not a viable alternative. (OCA Statement 2, p. 38.)

Q. What can you conclude based upon Mr. Konidena's testimony regarding these three alternatives?

A. I agree with Mr. Konidena's testimony that these three alternatives are not suitable. In fact, there appears to me to be zero dispute that none of the three engineering solution

alternatives (i.e., DLR, NTAs, distribution system connection) are reasonable or feasible to address the identified need for this Project.

Q. Does Mr. Konidena discuss any other alternatives?

A. Yes. Mr. Konidena finally discusses an alternative involving direct connection to the proposed Nescopeck 230 kV Switchyard ("Nescopeck Alternative"). I note that the Nescopeck 230 kV Switchyard has not yet been constructed and is the subject of a separate ongoing proceeding, which is a full siting application concerning the Sugarloaf 500/230 kV Transmission Line Project. However, Mr. Konidena does concede that "the 9-mile distance and right-of-way considerations are legitimate engineering factors that may favor the Tomhicken approach from a siting standpoint." (OCA Statement 2, p. 40.)

Q. Are there specific flaws with the purported "Nescopeck Alternative" identified by Mr. Konidena?

A. Yes. At the outset, this alternative is based upon the build-out of 9 miles of additional HV transmission lines that carry other, significant engineering factors, some of which were readily identified by Mr. Konidena. As I explain below, these engineering factors would substantially increase the cost of the Project. I also note that PPL Electric witness Mr. Sparhawk addresses this alternative from a routing and environmental impacts perspective in his rebuttal testimony (PPL Electric Statement No. 3-R), and that many of these engineering factors overlap with the routing and environmental factors that he identifies.

Specifically, there are a number of engineering factors associated with this proposal that would substantially increase the cost and complexity of the Project, warranting its

rejection. First is landowner and right-of-way ("ROW") considerations. The Company would almost certainly be required to acquire many more parcels of land or easements over land in order to obtain sufficient ROW for the Project. This would involve substantial negotiation with landowners and the creation of engineering and design solutions depending on the Company's ability to acquire ROW. The proposal would also require additional Erosion and Sediment controls for roads, construction pads, or other structures. Additionally, the Company would anticipate the potential for more significant terrain challenges resulting from this alternative because of the topography between the proposed Nescopeck and Tomhicken sites. This would raise costs and could require additional structures. There is also additional permitting risk associated with this alternative, as the Company would be required to obtain more permits and agency approvals for things like railroads, highways, streams, and airports. This alternative also begets the additional consideration of viewsheds, landowner impacts, and electrical and ground clearances. Another critical consideration is the exposure resulting from the line length. By nature, longer transmission lines result in more exposure to elements and therefore a higher risk of outages. The Company would have to consider whether the need for the longer, 9-mile transmission line segment would outweigh the engineering solutions required to mitigate risks and exposure. This would also increase the number of new structures required from 13 to approximately 60.

Q. Mr. Konidena states that he disagrees with PPL Electric's decision not to evaluate the Nescopeck Alternative "because PPL never performed a cost comparison between the

[Project as proposed and the Nescopeck Alternative].” (OCA Statement 2, p. 40.) How do you respond to this?

A. Evaluation of the purported Nescopeck Alternative was not warranted for the engineering reasons stated above, even setting aside any cost discrepancy. With respect to costs, however, the cost of a project inherently increases as the distance of the proposed project increases. While this increase is not always linear, the Nescopeck Alternative would almost certainly result in a cost increase of some degree, given the significant increase in length, the fact that ROW would need to be acquired, and given the engineering considerations which I listed in my answer to the above question, which was not an exhaustive list.

IV. HEALTH AND SAFETY

Q. Do any of the parties besides OCA provide testimony related to the health and safety of the Tomhicken 230 kV Switchyard Project?

A. Yes. Ms. Cook raises a concern that the Tomhicken 230 kV Switchyard “will be dangerously close to many residential properties.” (Cook Direct, p. 13.) She testifies that the transmission lines “present a fire hazard to the surrounding homes and forested areas.” (*Id*.) She also avers that helicopter maintenance will constitute “an invasion of privacy,” a “physical threat,” and a “dangerous hazard.” (Cook Direct, p. 14.) Several other individuals at the public input hearings also expressed general health-related concerns. (Tr. at 262, 270, 273, 294, 317, 348-349.)

Q. Do you agree with Ms. Cook’s characterization that the Tomhicken 230 kV Switchyard will be “dangerously” close to residential properties?

A. No. PPL Electric has in place specific design and engineering criteria for its HV transmission lines that have been satisfied in this case. I would like to emphasize that PPL Electric uses the industry standard as a minimum, and creates an additional contingency for design specifications which it adheres to within the scope of each project.

Specifically, PPL Electric adheres to the National Electrical Safety Code ("NESC"), and treats this as a minimum set of design standards. Facilities within PPL Electric's ROW, such as conductors, comply with the NESC guidance for conductor-to-structure plus a buffer distance to account for extreme weather conditions, which is more than is required by the NESC, but is a standard PPL Electric contingency. Importantly, the proposed HV transmission line structures at issue in this case are a minimum of 75 feet from the edge of the ROW utilized to the centerline of the ROW, whereas conductors will be approximately 55 feet from the edge of the ROW, depending on design and construction factors.

It is also my view that the Tomhicken 230 kV Switchyard is not near a residence such that these safety concerns are well-founded. NESC does not provide for an exact buffer distance for structures like switchyards to other structures like residences. However, it is my experience that generally, there is a buffer around switchyards or substations upon properties to account for fencing, equipment, and general operations of the facility.

Q. How do you respond to Ms. Cook's concern regarding the potential fire hazard presented by the transmission lines that will be constructed as part of the Project?

A. While I understand that individuals may have valid concerns regarding the risk of fire hazards from electric utility facilities and other utility infrastructure, I want to emphasize

that those hazards are minimal and are mitigated further with respect to the HV transmission lines at issue in several ways. First, the Company's adherence to the NESC itself addresses many of these issues and concerns. Next, transmission structures are grounded and bonded. This means that there is a path to ground in the event of lightning, and that these structures are designed so that stray voltage is dissipated. Additionally, relay settings for transmission conductors are even more sensitive than for distribution conductors. In the event that a conductor would fault or fail, or if a tree might fall onto the conductor, that conductor would deenergize within milliseconds. The system is designed so that faults are isolated very quickly. Further, the Company inspects its transmission facilities yearly, and deficiencies are corrected when they are found. Finally, the Company maintains its transmission ROW, and the maintenance of these ROWs means that there is less fuel available in the event of a fire.

Q. Please also respond to Ms. Cook's testimony on privacy and safety concerns related to helicopter maintenance of transmission lines.

A. The Company uses helicopters for a few tasks. The first is aerial surveys. While I understand the testimony related to privacy concerns, I would emphasize that, while photos may be taken in the performance of aerial surveys, the subject of the photos is the facility itself. Homes are never the subject of the photos, because these photos are merely taken for the purpose of inspecting the facilities. The Company also uses helicopters to perform some maintenance tasks. Helicopters have their own safety procedures and standards to follow, and I think it is important to state that the Company will not utilize helicopter maintenance where it would be exceedingly dangerous to do so.

Q. Do you wish to provide any further response to the general health-related concerns to which the public testified at the public input hearings?

A. Yes. Some individuals testified about noise- and construction-related disturbances as well. (*See*, Tr. at 104, 155-157, 263, 343, 349, 352.) It is inherent that there will be some degree of noise associated with the construction of the Project. However, the Company generally confines this to the daytime, and the noise is isolated to the area where the work is being performed. Further, these types of concerns are mitigated by the Company on a case-by-case basis. The ROW team coordinates with the construction team to mitigate specific landowner concerns where possible. I also understand concerns about other construction-related disturbances, such as the use of local roads. Initially, I will note that the Company adheres to state and local rules on roads, including road limits or weight restrictions. The Company tries to avoid landowner driveways where possible. Further, the Company's use of certain roads, such as stone roads, farm roads, or general access roads is often covered by the environmental permits it obtains. But, road maintenance is largely performed on a case-by-case basis, and the Company takes steps to fix road damage that may occur.

Q. Do any of the parties provide testimony related to electromagnetic fields ("EMF")?

A. Yes. Ms. Cook disputes the EMF fact sheet which was included in the original filing within **PPL Electric Exhibit 5**. (Cook Direct, p. 13.) Several other individuals at the public input hearings also raised concerns related to EMF. (*See* Tr. at 156, 270, 337.)

Q. Please respond to this EMF-related testimony.

A. I would mainly like to reiterate the discussion from the Company's original filing, which was contained within Section 4.0 of Attachment 4 – Design Criteria and Safety. Importantly, PPL Electric designs its facilities for zero EMF at the edge of ROW. Further, for this specific Project, there are not currently dwellings or structures located on the edge of the Company's ROW, meaning that there is a further buffer from the edge of ROW to other dwellings or structures, which mitigates this concern completely. Additionally, there is no current scientific evidence demonstrating that magnetic fields cause any adverse health effects or pose a health and safety threat to the public. I would also note that the Company designs lines with ground clearances higher than that required by NESC where practicable at low or no cost, which further lowers any magnetic field exposures. The instant Project is designed with clearances that are at least 3 feet higher than NESC standards.

V. CONCLUSION

Q. Does this conclude your Rebuttal Testimony at this time?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 3-R

REBUTTAL TESTIMONY OF PETER SPARHAWK

TOPICS ADDRESSED: PROPOSED ROUTE
SUGGESTED ALTERNATIVE ROUTE
ENVIRONMENTAL ASSESSMENT AND MITIGATION

DATE: AUGUST 7, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Peter Sparhawk, and my business address is 350 Eagleview Boulevard, Suite 250, Exton, PA 19341.

Q. Did you previously submit testimony in this proceeding on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company")?

A. Yes. On May 13, 2026, I submitted my direct testimony, PPL Electric Statement No. 3, relative to the "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" at Docket No. A-2025-3059443 ("Tomhicken 230 kV Switchyard Project" or the "Project").

Q. What is the purpose of your rebuttal testimony?

A. My testimony responds to certain issues raised by the Office of Consumer Advocate ("OCA") Witness Rao Konidena, Protestant Erika Cook, and to testimony provided at the public input hearings. Specifically, I will respond to each of these three testimonies as it relates to the proposed Project transmission line and the associated environmental concerns as expressed by Mr. Konidena, Ms. Cook and those providing input during the public input hearings.

Q. Are you sponsoring any exhibits associated with your rebuttal testimony?

A. No.

Q. How have you arranged your rebuttal testimony?

A. I have arranged my rebuttal testimony to acknowledge my experience with transmission line routing/siting and testifying before the Pennsylvania Public Utility Commission (the "Commission or "PUC"); summarizing my understanding of the Project and the instant Letter of Notification ("LON") proceedings; and addressing the specific routing, environmental, permitting and land use issues raised by OCA Witness Rao Konidena, Protestant Erika Cook, and applicable comments provided by attendees of the public input hearings.

II. SCOPE OF INQUIRY FOR ENVIRONMENTAL REVIEW

Q. Please reiterate the breadth of your experience as it pertains to transmission line siting proceedings before the Pennsylvania Public Utility Commission

A. My responsibilities include managing, coordinating, and providing senior review for a variety of environmental assessment, regulatory, and compliance projects and tasks for electric transmission projects. These projects include leading and participating in siting and routing studies, feasibility studies, compliance with state and federal regulatory processes, state filings before public utility commissions (including the Pennsylvania PUC), environmental permitting projects, and similar environmental and planning assignments.

Specifically, I have been responsible for helping PPL Electric Utilities Corporation ("PPL Electric" or the "Company") prepare various attachments and analyses for inclusion in full siting applications or letters of notification to the PUC for approximately 40 electric transmission line projects since 2008. This has involved numerous direct, rebuttal and

surrebuttal testimony efforts, including both written and oral testimony on the stand before PUC administrative law judges.

Q. What is your understanding of the focus of the environmental review in the instant Letter of Notification ("LON") proceeding?

A. In the instant proceeding, it is my understanding that the subject and the focus of the environmental review are the subject high voltage ("HV") transmission lines and associated facilities to be constructed by PPL Electric. In this specific matter, this includes the 1.1 miles of new double-circuit 230 kV transmission taps, the Tomhicken 230 kV Switchyard, and two 0.1-mile-long 230 kV connecting lines from the Tomhicken 230 kV Switchyard to the Customer-owned substation. I would note that this does not include the Customer-owned substation or any end-use facilities.

III. ENVIRONMENTAL IMPACT

Q. Did any parties provide testimony on concerns related to environmental impacts of the Tomhicken 230 kV Switchyard Project?

A. Yes. Mr. Konidena, Ms. Cook, and several individuals at the public input hearings provided testimony related to the environmental impacts of the Project.

Q. Mr. Konidena puts forth a proposed alternative to the Project which would involve a direct connection to the proposed Nescopeck 230 kV Switchyard ("Nescopeck Alternative"). (OCA Statement 2, pp. 39-42.) Please provide your view of this Nescopeck Alternative from an environmental impact perspective.

A. While Mr. Konidena focused his proposed alternative primarily on a comparison to the proposed Project from a cost allocation and ratepayer impact perspective, it is important to note that the siting, right-of-way and resulting environmental and land use impacts on constructing such an alternative would be significantly greater than the Project as proposed. Upon my review of Mr. Konidena's direct testimony, it appears that this would entail the connection of the Customer's substation directly to the proposed Nescopeck 230 kV Switchyard – which has been proposed as part of a separate and currently ongoing siting application proceeding – which is approximately 9 miles from the Customer's location. (OCA Statement 2, p. 39.) This connection, as PPL Electric stated in response to an Interrogatory from OCA, would certainly result in greater siting and right-of-way impact than the proposed solution. (OCA Statement 2, p. 39; PPL Response to OCA III-8(b) Supplemental.) In addition, the Nescopeck Alternative would generally require the acquisition of new transmission line right-of-way ("ROW") which, all else being equal, would result in greater environmental impacts than the short 1.1-mile transmission line and two 0.1-mile connections into the Customer's yard that are proposed as part of the Tomhicken 230 kV Switchyard Project.

Q. In her direct testimony, Ms. Cook cites to your own direct testimony at PPL Electric Statement No. 3 regarding vegetation clearing at the Tomhicken 230 kV Switchyard site and the Pennsylvania Natural Diversity Inventory ("PNDI") which was performed, and testifies that the Project will result in a "significant amount of environmental impact." (Cook Direct, p. 14.) Is this a fair characterization of the environmental impact that is expected to result from the Project?

A. No. Relative to any other route that could be considered to connect the existing 230 kV system to the proposed PPL Electric switchyard and then to the Customer's substation, the Project as proposed would result in significantly less impact to the environment in the area. As Ms. Cook notes, the PNDI results did indicate that some habitat and species of concern may potentially exist in the general Project area. These species were documented in Attachment 3 of the filed LON and well as my direct testimony (pp. 9-11), which she quoted in her testimony. Furthermore, a detailed discussion of the agency's initial responses and requests for additional surveys – as well as clearances for various species of concern – was presented in the LON itself in Section V, Land Use and Environmental Evaluation. These discussions clearly showed the efforts underway by PPL Electric to minimize impacts on the environment, permits needed to construct the proposed facilities and compliance commitments with those permits, as well as methods to remediate any impacts that would occur.

Since the LON and direct testimony was filed, PPL Electric's environmental consultant for the Project, Verdantas, provided me with a current status of the ongoing Project consultation and permitting efforts. This update indicated that coverage under the required Chapter 102 NPDES permit and Chapter 105 General Permit has been received and reiterated that the studies, avoidance measures, compliance measures and clearances are as discussed in the LON.

To summarize once again, the Project will have minimal adverse environmental impacts when compared to any alternative that would require building new transmission lines and related facilities where none presently exist. I acknowledge that there is no route which would not have any impacts for this – or any – transmission line project. However,

I remain of the view that the route as proposed remains reasonable, and satisfies the requirements of the Commission under 52 Pa. Code § 57.75(e)(3).

Q. Please summarize the testimony received at the public input hearings as it related to concerns about environmental impacts of the Tomhicken 230 kV Switchyard Project.

A. Individuals at the public input hearings testified that they were concerned about:

- Impact of the Project on nearby wetlands;
- Impact of the Project on watershed lifecycles;
- Impact to wildlife, including bats;
- Environmental impacts, generally;
- Water runoff;
- Herbicides and/or pesticides used in ROW maintenance.

(*See*, Tr. at 98, 130, 155-157, 164, 180-182, 186, 267-268, 336, 343.)

Q. Please respond to the environmental impact-related testimony received at the public input hearings which you just summarized.

A. These are all legitimate concerns. As summarized in the LON and Attachment 3, my direct testimony in this proceeding, and my responses presented above in this rebuttal testimony, the impacts identified during the public hearings are being minimized or eliminated through Project design and avoidance measures, compliance with agency recommendations and permit conditions, and ongoing consultation with those agencies during project development, construction and operation as required. These proactive practices and compliance measures are designed specifically to address such concerns as were identified during the public hearings.

For example, wetland impacts are reduced by applying avoidance measures during design and greatly reducing potential impacts on wetlands and streams by choosing a route that requires significantly less right-of-way than any other transmission line solution; potential impacts on species such as the northern long eared bat have been eliminated or greatly reduced through conducting an on-site review of rock outcrops for potential habitat and subsequently modifying the work pads/accesses to avoid areas of concern, as well as abiding by time of year tree clearing restrictions; water runoff and potential impacts on receiving waters are minimized through best management practices and stormwater control measures, as well as compliance with any other requirements of the NPDES construction permit; potential impacts from herbicides and/or pesticides are eliminated by strict adherence to PPL's *Specification for Transmission Vegetation Management* (LA-79827), which documents requirements for such items as property owner notification, clearing requirements, herbicide application policies (which include using only U.S. EPA-approved herbicides); and other impact-reducing or minimization techniques as discussed throughout the LON and associated documents. PPL Electric's goal for this Project – as well as any transmission line project – remains the same: develop and construct a transmission line and associated facilities that reasonably minimize adverse impacts on the natural and human environments; minimize special design requirements and unreasonable costs; and can be constructed and operated in a safe, timely, and reliable manner. In my opinion, PPL Electric has chosen a Project solution that does exactly that.

Finally, I would like to note that there were many comments provided at the public input hearings as related to the environmental impacts of the Sugarloaf 500/230 kV Transmission Line Project and of end-use facilities, including data centers. However, the

instant proceeding is related to the transmission lines that have been proposed as part of the Tomhicken 230 kV Switchyard Project, and the environmental analysis should therefore be focused on the impacts of these lines, and not of any other projects or developments.

IV. CONCLUSION

Q. Does this conclude your Rebuttal Testimony at this time?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 4-R

REBUTTAL TESTIMONY OF CHAD HUBER

TOPICS ADDRESSED: LAND AND RIGHT-OF-WAY CONCERNS

DATE: AUGUST 7, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Chad Huber. My business address is 827 Hausman Road, Allentown, Pennsylvania 18104.

Q. By whom are you employed and in what capacity?

A. I am employed by PPL Services Corporation as a Transmission Right of Way and Real Estate Supervisor. In this position, my primary responsibility is to supervise all Transmission Right of Way ("ROW") and Real Estate assets for PPL Services Corporation in service to PPL Electric Utilities Corporation ("PPL Electric" or the "Company").

Q. What is your educational background?

A. I studied engineering at The Pennsylvania State University and in 2009 received a Bachelor of Science Degree in Environmental Systems Engineering.

Q. Are you a member of any professional organizations?

A. Formerly. For over five (5) years I was a member of the International Right of Way Association ("IRWA"), where I took classes to work towards attaining the Senior Right of Way Agent ("SR/WA") certification, which is the highest-level industry designation. The certification requires course work consisting of both core courses and elective courses. The certification requires satisfactory completion of the certification test administered by the IRWA. I previously held IRWA's Right of Way Professional ("RWP") certification, which was one level below the SR/WA certification. I am currently working

to renew my IRWA membership and certification, in my recently acquired position with the company.

Q. Please describe your background and employment history.

A. I have been employed by PPL Electric for approximately eight and a half years. I started with PPL Electric in January 2018 as a Senior Right of Way Specialist and worked in that capacity for approximately five and half years. Next, I transitioned to the Siting Department where I worked as a Lead Siting Specialist for approximately three years, responsible for evaluating and identifying new transmission and distribution facilities as well as project specific public outreach. Prior to my employment at PPL, I was employed by the former Louis Berger Group, Inc. (since acquired by WSP) for approximately eight years. During my employment at Louis Berger Group, Inc. I was responsible for project and construction management for contracts held with the United States Postal Service (USPS), United states Army Corps of Engineering ("USACE") and Department of Homeland Security – Federal Emergency Management Agency ("DHS – FEMA").

Q. Did you previously submit testimony in this proceeding on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company")?

A. I have not. I am submitting my rebuttal testimony in place of Austin Weseloh, whose direct testimony was PPL Electric Statement No. 4, relative to the "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" at Docket No. A-2025-3059443 ("Tomhicken 230 kV Switchyard Project" or the "Project"). Further, I am adopting the Direct Testimony of Austin Weseloh, PPL Electric Statement No. 4.

Q. What are your responsibilities in connection with the proposed Project?

A. My primary responsibility is to supervise all Transmission Right of Way ("ROW") and Real Estate assets and associated activities for PPL Services Corporation in service to PPL Electric. These activities include but are not limited to: enforcement of PPL Electric's rights, encroachment mitigation, ROW acquisition and the purchase/sale of real estate.

Q. What is the purpose of your rebuttal testimony?

A. My testimony responds to certain issues raised by Protestant Erika Cook, Protestant John Zola, and several individuals who provided testimony at the public input hearings. Specifically, I will respond to the testimony of these individuals as it relates to interactions with land agents and other representatives of PPL Electric and to ROW and eminent domain concerns.

II. <u>LAND- AND ROW-RELATED CONCERNS</u>

Q. Please summarize the testimony that was received regarding interactions with land agents and other representatives of PPL Electric.

A. Multiple individuals at the public input hearings, including Mr. Zola, provided testimony concerning an information session held by PPL Electric at the Valley Country Club in Sugarloaf, Pennsylvania, on Wednesday April 30, 2025. (Tr. at 141, 177, 211, 334, 343.)

These individuals largely testified that they felt that their questions went unanswered at the information session. Other individuals testified about concerns related to interactions from land agents or other PPL Electric representatives as they pertained to ROW matters. (Tr. at 141-142, 177-178, 376-377.)

Q. How do you respond to the testimony received at the public input hearings regarding interactions of these individuals with representatives from PPL Electric?

A. PPL Electric held a public open house for its proposed transmission line project to inform the public of the project details and address questions or concerns the public may have. The Company's standard approach and configuration of public open houses is station-based, which includes the various project disciplines, where each station is staffed by individuals knowledgeable in the specific topic. The public open house included the following stations: a welcome station, overview of how the transmission system works, project need, project overview, siting process, route selection, ROW, graphic representation of the current vs. future state, engineering, environmental & permitting process, construction activities and project timeline. Public open house materials, along with other project related materials/information and a means to contact PPL Electric are also publicly available on PPL Electric's project subspecific website (sugarloafproject.com).

During the evening of the open house, attendees were informed of the station-based layout and were asked to adhere to the setup and style, so questions could be asked of the PPL Electric staff and addressed on an individual or small group basis. During the public open house, the attendees did not abide by PPL Electric's request and instead grouped

together in a "townhall" type group, demanding questions be asked on the groups' behalf by one person. Multiple PPL Electric staff attempted to explain that the public open house was set up as station-based, and PPL Electric staff were happy to answer questions or address concerns on an individual or small group basis. Upon a breakdown in communication between the group formed by the public and PPL Electric, the group began to slowly diffuse, and some individuals began engaging with PPL Electric staff in the station-based layout. PPL Electric staff continued to engage with those respecting the station-based layout until the public open house ended.

PPL Electric staff, contractors, and others acting on behalf of the Company are to conduct business matters in accordance with PPL Electric's Internal Practices for Dealing with the Public on Power Line Project. The Internal Practices provide, in pertinent part:

> "PPL Corporation has a long-standing commitment to conducting business in an honest and ethical manner. Consistent with expectations for our employees and representatives laid out in the PPL Standards of Conduct and Integrity, and the Standards of Conduct and Integrity for Suppliers, PPL Electric Utilities Corporation's employees, contractors and agents who interact with members of the public (including landowners along proposed rights of way) in activities such as planning, real estate and right-of-way transactions, siting, and construction of power lines and other facilities will:
>
> - Act with integrity at all times.
> - Treat people courteously and in a professional manner.
> - Be forthright and honest in all actions and communications.
> - Comply with applicable laws and regulations.
> - Seek to avoid conflicts of interest.
> - Accept responsibility for actions and decisions.
> - Be responsible stewards of the environment.

- Place a high priority on the safety of the public and our representatives and employees."

In each interaction with members of the public, the Company strives to adhere to its Internal Practices, and the same was done at the public open house held at the Valley Country Club.

Q. How would you respond to any concern regarding ROW and land access issues which may come about as the result of the Sugarloaf 500/230 kV Transmission Line Project?

A. I would just like to confirm that these issues are the subject of a separate and ongoing siting application proceeding, and the appropriate place to address any such issues is within that proceeding. I am not aware of any such issues that have occurred in connection with the Tomhicken 230 kV Switchyard Project, as all necessary land and ROW for this Project was either owned by PPL Electric or acquired from the Customer.

Q. Can you please confirm that all necessary ROW for the Tomhicken 230 kV Switchyard Project has been secured?

A. That is correct. All necessary ROW for the Project has been obtained.

III. CONCLUSION

Q. Does this conclude your Rebuttal Testimony at this time?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

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PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 5-R

REBUTTAL TESTIMONY OF JOHN D. TAYLOR

TOPICS ADDRESSED: **FERC AND COMMISSION JURISDICTION**
TRANSMISSION RATES AND COST ALLOCATION
CUSTOMER-SPECIFIC INVESTMENTS
TARIFF ISSUES
RESOURCE ADEQUACY

DATE: AUGUST 7, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is John D. Taylor, and my business address is 10 Hospital Center Commons, Suite 400, Hilton Head Island, South Carolina 29926.

Q. On whose behalf are you appearing in this proceeding?

A. I am appearing on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company").

Q. By whom are you employed and in what capacity?

A. I am the Co-Founder and Chief Executive Officer ("CEO") of Atrium Economics ("Atrium"), a regulatory economics and energy consulting firm that advises electric, natural gas, transmission, pipeline, and infrastructure clients in regulatory, ratemaking, cost allocation, and rate design matters

Q. Please summarize your professional background.

A. I am a regulatory economist with more than twenty years of experience advising utilities and infrastructure companies in the United States and Canada. My work has focused on revenue requirements, class cost of service, marginal and embedded cost allocation, rate design, capital recovery, revenue stabilization mechanisms, affiliate and shared-services cost allocation, infrastructure cost recovery, demand forecasting, lead-lag studies, return on equity, and regulatory strategy. I have served as a lead expert witness in rate and regulatory proceedings across more than twenty jurisdictions, including proceedings before the Federal Energy Regulatory Commission ("FERC"), state public utility commissions,

provincial utility regulators, and courts. My testimony experience includes matters before the Pennsylvania Public Utility Commission ("Commission" or "PUC").

While a substantial portion of my work has involved electric and gas revenue requirements, class cost of service, and rate design, my experience extends to the broader economic and regulatory principles that apply when utilities recover the costs of shared infrastructure. That includes analysis of how costs are functionalized, classified, and allocated; how common and overhead costs should be recovered; how rate structures affect customers and other users of utility infrastructure; and how regulators balance cost causation, fairness, rate stability, and public policy objectives.

I also have substantial experience with large loads and data center-related tariff issues. I have provided testimony addressing large load and data center tariff matters, and I have advised multiple utilities on large load interconnection requirements, customer-specific contracts, cost assignment, rate design, credit and collateral protections, minimum load commitments, stranded cost protections, and the broader regulatory implications of connecting significant new load to the electric system. That experience includes evaluating how utilities should balance the obligation to serve new customers with the need to protect existing customers from unreasonable cost shifting and stranded cost risk. Additional details on my qualifications and experience are provided within PPL Electric Exhibit JDT-1R.

Q. Did you previously submit testimony in this proceeding on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company")?

A. No. However, my rebuttal testimony responds to Office of Consumer Advocate ("OCA") witnesses Felder and Konidena regarding the scope of this Letter of Notification ("LON") proceeding, transmission cost allocation, customer-specific investment issues, tariff protections, and resource adequacy. I explain why those issues do not provide a basis to deny PPL Electric's request for siting approval or impose additional conditions in this proceeding.

II. PURPOSE OF TESTIMONY AND SUMMARY OF CONCLUSIONS

Q. What is the purpose of your rebuttal testimony?

A. My testimony responds to certain policy issues raised by OCA witnesses Felder and Konidena related to the "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" at Docket No. A-2025-3059443 ("Tomhicken 230 kV Switchyard Project" or the "Project"). My rebuttal testimony is arranged as follows:

- Section III – PPL Electric's Request for Approval and Scope of LON Proceeding
- Section IV - Transmission Rates and Cost Allocation
- Section V - PPL Electric's Anticipated Cost Allocation
- Section VI - Ongoing Customer Contribution and Transmission Rate Impacts
- Section VII – Customer-Triggered vs. Customer-Specific Investments
- Section VIII - Phase 1 / Phase 2 and Forward-Looking Facilities

- Section IX - Tariff Issues
- Section X - Resource Adequacy
- Section XI - Conclusion

Q. Are you sponsoring any exhibits associated with your rebuttal testimony?

A. I am sponsoring no additional exhibits outside of my qualifications provided within PPL Electric Exhibit JDT-1R.

Q. Please summarize your principal conclusions.

A. My principal conclusions are as follows:

- **This proceeding should remain focused on the relief actually requested.** PPL Electric seeks Commission approval to site and construct the Tomhicken Project; it does not seek Commission approval of the recovery, allocation, or ratemaking treatment of the Project's transmission costs. FERC-approved tariffs and processes govern those transmission-rate issues and should not be adjudicated indirectly through this project-specific LON proceeding.
- **The Commission should reject OCA's characterization of a jurisdictional or policy "gap."** The respective roles of the Commission and FERC are established: the Commission addresses matters within its state siting and retail-tariff authority, while FERC regulates interstate transmission rates and associated cost recovery. Existing FERC formula-rate protocols also provide transparency, stakeholder review, challenge procedures, and the potential disallowance of costs that are not properly recoverable.

Additionally, PJM Interconnection, L.L.C. ("PJM") and FERC are actively addressing large-load issues that OCA raises throughout its testimony.

- **PPL Electric's proposed cost allocation is reasonable because it is based on the function of the facilities, not merely on who initiated the Project.** Facilities dedicated to physically connecting and serving the customer requesting to connect ("the Customer") are appropriately assigned to the Customer, while facilities that become integrated into the transmission network and provide broader reliability, capacity, resiliency, operational flexibility, or future-use benefits may appropriately be treated as network facilities, subject to FERC review.
- **A customer-triggered facility is not necessarily customer-specific.** The fact that the Customer's service request necessitated the Project does not mean that the costs for every resulting facility should be assigned exclusively to that Customer. A "but-for" test may identify why construction began. Still, it does not replace the project-specific engineering and functional analysis necessary to distinguish dedicated customer assets from integrated transmission facilities.
- **The Commission should not use the allocation from another large-load project as a benchmark for Tomhicken.** PPL Electric does not apply a fixed customer allocation percentage across projects.[1] Each project involves different facilities, configurations, functions, and system benefits, and therefore requires an individualized analysis.
- **The Customer's contribution should be evaluated on a comprehensive, net basis.** In addition to funding approximately $21.5 million of directly assigned facilities, the Customer will pay ongoing transmission charges based on its contribution to PJM peak

[1] OCA 1-6 Attachment 1 – PPL Electric Utilities Corporation – Policy on Cost Allocation for Large Customer Interconnections.

demand. PPL Electric's analysis indicates that, when the approximately $38.4 million of incremental transmission investment and the Customer's incremental load are considered together, estimated transmission service charges decline across the customer classes evaluated. Accordingly, the amount proposed for transmission rate base should not be treated as an equivalent net burden on existing customers.

- **Existing customers are protected by the recently approved Rate Schedule LP-6 ("LP-6") in the Company's tariff and the Customer's Electric Service Agreement ("ESA").** Those protections include Contribution in Aid of Construction ("CIAC") funding for directly assignable facilities, security for certain investments placed in transmission rate base, minimum load commitments, ongoing payment obligations, exit fees, default provisions, and other contractual safeguards. These mechanisms directly address the risks that the projected load fails to materialize, develops more slowly than expected, or terminates prematurely.
- **Forward-looking design does not make a facility customer-specific.** Transmission facilities may reasonably be designed to accommodate foreseeable expansion, preserve operational flexibility, avoid future reconstruction and outages, and support the efficient long-term development of the integrated transmission system. The relevant question remains how the facility functions and what benefits it provides, not whether it includes capacity or design features that may support future needs.
- **The Commission should decline to impose OCA's proposed tariff conditions in this LON.** Large load registries, generation-procurement requirements, reliability backstop cost allocation, blanket curtailment mandates, and other statewide policies should not be established through a single transmission line siting case, particularly

where related matters are already addressed through LP-6, the ESA, Commission proceedings, PJM stakeholder processes, and ongoing FERC proceedings.

- **Resource adequacy and transmission reliability are distinct.** Resource adequacy concerns whether sufficient generation exists to meet demand and is principally addressed through PJM market and planning processes. PPL Electric's responsibility in this proceeding is to determine whether the transmission system can safely and reliably serve the requested load without thermal, voltage, stability, or other reliability violations. Broader resource adequacy concerns do not provide a basis to deny the LON or impose requirements that PJM, FERC, or the Commission has not adopted.
- **The Commission should approve the Project without the additional cost-allocation, tariff, resource adequacy, or curtailment conditions proposed by OCA.** The Commission should evaluate the Project on the project-specific siting record, recognize the functional distinction between dedicated and integrated transmission facilities, account for the Customer's continuing contribution and existing contractual protections, and leave transmission-rate and regional market-design issues to the established proceedings with jurisdiction over those matters.

III. PPL ELECTRIC'S REQUEST FOR APPROVAL AND SCOPE OF THIS LON PROCEEDING

Q. Please describe what PPL Electric requested in its Letter of Notification filing in this proceeding.

A. PPL Electric filed a LON pursuant to the Commission's transmission line siting regulations seeking approval to construct the first phase of the Tomhicken Project in Hazle Township, Luzerne County. Specifically, PPL Electric requested approval to construct approximately

1.1 miles of new double-circuit 230 kV transmission tap lines needed to connect the existing Susquehanna-Harwood #1 and #2 230 kV transmission lines to a new Tomhicken 230 kV switchyard, together with two short 230 kV connecting lines between the switchyard and a customer-owned substation. These facilities are needed to provide transmission-level service to a new customer, and the facilities would be located entirely on property owned by PPL Electric or the Customer. Consistent with its obligation to serve[2], PPL Electric evaluated the Customer's request and identified the facilities necessary to safely and reliably provide the requested transmission service. A portion of the proposed additions will become part of the integrated 230 kV transmission network and provide broader system functions beyond the Customer's initial interconnection.

The Tomhicken Project is being developed in phases. The facilities included in this proceeding represent only Phase 1, which PPL Electric states is necessary to provide the customer's initial service requirements. Phase 2 is the subject of a separate application, filed in Docket No. A-2026-3061547.

Q. What is the purpose of a Letter of Notification proceeding?

A. A Letter of Notification proceeding is a streamlined siting process established by the Commission's transmission line regulations for certain transmission projects that satisfy specified criteria. In an LON proceeding, the Commission reviews whether the proposed transmission facilities should be approved from a siting and construction perspective and whether the filing complies with applicable Commission regulations governing transmission line construction.

[2] See 66 Pa.C.S. § 1501; see also 66 Pa.C.S. §§ 1103(a) and 2802(12).

Consistent with those regulations, PPL Electric requested approval to construct the transmission facilities described in its filing. The focus of the proceeding is therefore whether the proposed facilities and their location satisfy the requirements applicable to an LON filing.

Q. Does Commission approval of a LON determine the accounting treatment, transmission rate treatment, or ultimate cost recovery associated with a project?

A. No. The Commission has previously recognized that approval of a LON is limited to the transmission line siting approval before it and does not constitute a determination regarding accounting treatment or cost recovery. For example, in approving PPL Electric's Susquehanna 230 kV and 500 kV Transmission Line Project through the LON process, the Commission expressly stated that its approval "does not address the issues of accounting treatment, and cost recovery."[3] PPL Electric Witness Joseph Lookup provides additional examples where the Commission did not address these issues in approvals of a LON.

Accordingly, the question presented in this proceeding is whether the proposed facilities should be approved under the Commission's transmission siting regulations. Issues concerning the ratemaking treatment of transmission facilities, transmission cost recovery, or the allocation of transmission costs are addressed in other regulatory forums and proceedings. They are not determined by the mere approval of an LON filing.

[3] Susquehanna 230 kV and 500 kV Transmission Line Project, Docket Nos. A-2025-3056806 and P-2025-3056867, Order (entered Sept. 25, 2025), pp. 9

Q. If parties disagree with PPL Electric's future treatment of transmission costs associated with the Project, are there established regulatory processes available to review and challenge those costs?

A. Yes. PPL Electric's FERC-approved transmission formula-rate protocols provide multiple opportunities for review and challenging transmission costs and cost recovery. Those processes include annual formula-rate updates, true-ups, supporting workpapers, information requests, preliminary challenges, and formal challenges before FERC, including challenges to the prudence of projected and actual transmission expenditures and the proper application of the formula. Interested parties retain their rights under Section 206 of the Federal Power Act to challenge an existing transmission rate, tariff provision, classification, or practice as unjust or unreasonable. Accordingly, the existence of these established federal review mechanisms further demonstrates that this proceeding need not resolve every potential future question regarding transmission cost recovery. Rather, this proceeding may appropriately focus on the necessity and propriety of constructing the proposed facilities and PPL Electric's compliance with applicable Commission requirements, while questions concerning the ultimate recovery and allocation of transmission costs remain subject to the applicable FERC-jurisdictional processes.

Q. Are the issues addressed in OCA's testimony limited to the scope of this LON proceeding as you have described it?

A. No. Although OCA's witnesses address the proposed transmission facilities, their testimony extends well beyond the limited siting and construction issues presented in this LON proceeding. Among other things, they raise issues concerning transmission cost

allocation and recovery, modifications to PPL Electric's retail tariff, resource adequacy, generation procurement, large-load registries, reliability backstop procurement ("RBP"), customer credit and collateral requirements, stranded-cost protections, and curtailment priorities. Those broader policy and ratemaking matters are not part of the relief requested in this LON and, in many instances, have and are being addressed through separate Commission, PJM, or FERC proceedings and rulemakings. Accordingly, those issues should not be used to expand this project-specific siting proceeding or to impose conditions unrelated to whether the proposed facilities satisfy the Commission's applicable siting requirements.

Q. Given these issues are outside the scope of this LON proceeding, please clarify the purpose of your remaining testimony.

A. Sections IV through X of my testimony, below, are solely offered to rebut irrelevant and out of scope testimony offered by OCA. I am advised by counsel that, to the extent that an appropriate objection or motion is made and granted excluding that material from the record, the corresponding sections of my testimony would not be required to be entered into the record.

IV. TRANSMISSION RATES AND COST ALLOCATION

Q. Please summarize OCA's policy arguments regarding the allocation of Project costs in this proceeding.

A. Witness Felder summarizes the main issues associated with an increase in large loads connecting to PJM's system, which include resource adequacy, PJM market impacts, curtailment priority, supply obligations, cost recovery, collateral, and tariff protections.

Witness Felder goes on to claim that a policy gap between federal and state jurisdiction is driving the need for changes to PPL's distribution tariff to address these issues.[4] One of the issues raised is an argument that the proposed method of connecting the large load will drive unavoidable cost shifting from large load customers to ordinary ratepayers.[5] Witness Felder goes on to argue that PPL Electric can apply its cost allocation policy in a way that solves the policy gap and addresses the cost shifting.[6]

Q. Do you agree with OCA's characterization that this proceeding presents a "policy gap"?

A. No. The Commission has already addressed large load tariff policy through its model tariff proceeding, and the respective roles of the Commission and FERC are established. FERC's jurisdiction to assess affordability impacts from transmission cost allocation and the state's jurisdiction in distribution cost allocation, transmission siting, and service agreement decisions are well established.[7] FERC is currently carrying out a Show Cause Order for PJM ("Show Cause Order"), as well as other Independent System Operators ("ISOs") and Regional Transmission Operators ("RTOs"), which will ensure cost allocation of transmission costs between large loads and other transmission customers, including PPL's retail customers, are just and reasonable.[8] Witness Felder's claim that PPL's cost allocation policy should be used to allocate less of the upgrade cost to network upgrades[9] ignores that

[4] OCA St. 1, pp. 3-4
[5] OCA St. 1, pp. 18
[6] OCA St. 1, pp. 20-22
[7] State commissions have jurisdiction over the specific terms of retail sales to large loads and any siting decisions and construction associated with large load projects and FERC has jurisdiction over cost shifting among transmission customers.
[8] See PJM Interconnection, L.L.C., et al., Docket No. EL26-67-000, Order Instituting Proceeding (Issued June 18, 2026) pp. 33-34 and 46. https://www.ferc.gov/media/e-7-el26-67-000
[9] OCA St. 1, pp. 23-24

FERC regulates the costs allocated to network upgrades and the Commission is not the appropriate regulatory body to rule on that topic. Witness Felder also ignores that the current FERC Show Cause Order is in the process of addressing this issue already. OCA's "policy gap" framing should not be used to convert this LON into a generic large load tariff or FERC jurisdictional policy proceeding.

Recent PJM developments further demonstrate that the issues identified by OCA are already being addressed through the appropriate regional and federal forums. On July 27, 2026, the PJM Board issued a decisional letter ("PJM Board Letter") directing PJM management and staff to proceed with a FERC filing that includes a Large Load Registry, RBP and Interim Resource Adequacy Service. The PJM Board Letter states that PJM will develop and maintain a registry of large loads, that Electric Distributors will be required to provide information needed for PJM to improve load forecast accuracy and transparency, and administer the RBP and Interim Resource Adequacy Service, and that PJM intends to address resource adequacy concerns associated with new large loads through a regional FERC-jurisdictional filing.[10] Those ongoing PJM and FERC processes reinforce why this LON should remain focused on the relief actually requested by PPL Electric in this siting proceeding.

Q. How are transmission line costs recovered by PJM Transmission owners like PPL Electric?

[10] PJM Interconnection, L.L.C., Board Decisional Letter on Critical Issue Fast Path – Reliability Backstop Procurement and Connect and Manage (July 27, 2026). https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2026/20260727-board-decisional-letter-on-cifp-reliability-backstop-procurement-and-connect-and-manage.pdf

A. Transmission owners like PPL Electric have two main avenues to recover the costs of transmission, including through transmission base rate and through service agreements with customers. The transmission base rates are calculated through a FERC process, which is described in more detail later in my testimony, where PPL Electric submits its costs associated with providing transmission service to its wholesale customers, and these costs are charged to these wholesale customers through what is called a formula rate approach.[11] Transmission owners can also charge an individual wholesale customer directly for some costs through a CIAC payment or special contract rates. CIAC is meant to fund facilities built to serve that customer, and any cost recovered through CIAC is offset from PPL's transmission rate base.[12]

Q. What regulatory agency is responsible for setting transmission base rates?

A. As mentioned above, FERC is the regulatory agency responsible for regulating interstate transmission rates. In the case of PPL Electric, which operates as part of PJM, transmission base rates are calculated using a formula-based approach outlined in a FERC-approved tariff. FERC is responsible for approving the formula rate methodology, the associated formula rate protocols ("Protocols"), and the overall framework for calculating and updating PPL Electric's transmission rates. The Protocols also provide for transparent annual updates and meaningful stakeholder review. Accordingly, questions regarding the recovery and allocation of costs through transmission base rates are subject to FERC's jurisdiction and oversight.[13]

[11] CAPS-DGA_PJM-Transmission-Handbook-Vol-7.pdf
[12] 12.2 Accounting for capital projects
[13] CAPS-DGA_PJM-Transmission-Handbook-Vol-7.pdf

Q. Please provide an overview of the FERC process for setting transmission base rates.

A. PPL Electric recovers the costs associated with its role as a transmission owner through its FERC-approved transmission formula rate. Under this approach, FERC does not re-litigate the entire transmission cost-of-service formula each year. Instead, the formula itself, along with the associated Protocols, has been approved by FERC and establishes the framework for updating transmission rates annually.

Annual updates include the information necessary to calculate the annual transmission revenue requirement, including total net plant, property, and equipment, depreciation and amortization, taxes other than income, return on rate base, and income taxes. Many of the inputs to the annual formula rate filing are sourced from the Company's FERC Form 1 filing. If an input is not sourced directly from the FERC Form 1, the Company must provide supporting documentation and explanations for the input. The annual cost components listed above are then summed together, and the resulting annual revenue requirement is then divided by PPL's previous year five-coincident peak value to determine the annual rate, expressed as a $/MW/Year value.

Importantly, the annual formula rate update is not merely an informational filing. The Protocols are designed to provide transparency and meaningful stakeholder review of the costs included in transmission rates. PPL Electric's Protocols govern the timing of the annual update, notices of meetings, opportunities for interested parties to review the update, and the timing for document and information requests. Customers, state commissions, consumer advocates, and other interested parties can review the filing, request supporting information, and evaluate whether costs have been properly included in transmission rates.

As part of this rate-setting process, parties impacted by the rates may file information requests with the utility and raise challenges regarding the prudency, classification, allocation, or recovery of costs included in the annual update. Typically, the process includes an information challenge to the utility under the Protocols. If concerns remain unresolved, parties retain the right to file a complaint under Rule 206 of FERC's Rules of Practice and Procedure or a complaint under Section 206 of the Federal Power Act alleging that a transmission rate, tariff provision, classification, cost allocation, accounting treatment, or related practice is unjust, unreasonable, or unduly discriminatory. FERC may require revisions to the annual update or disallow recovery of costs that it determines are not properly recoverable through transmission rates. FERC also has the authority, where appropriate, to direct changes to a transmission owner's rates, classifications, allocations, or practices if it determines they do not satisfy the applicable statutory standards.

Accordingly, the determination of which costs are appropriately included in transmission rates is subject to ongoing regulatory oversight and stakeholder scrutiny. If there are concerns that certain transmission facilities or costs included in transmission rates primarily serve a particular customer, such as a large load customer, and do not provide commensurate benefits to other transmission customers, FERC's formula rate review process provides an established forum for examining and adjudicating those concerns. Parties may raise those concerns through the annual Formula Rate Protocol review process, through challenges to annual updates, or through a complaint filed with FERC under Section 206 of the Federal Power Act. Those issues relate to the recovery and allocation of transmission costs under FERC's jurisdiction and are distinct from the issues presented in

this transmission siting proceeding. Accordingly, interested parties are not limited to this LON proceeding to challenge the future classification, allocation, or recovery of transmission costs associated with the Project. Rather, established FERC processes exist specifically for the review and adjudication of those issues.

Q. OCA witness Felder claims that "PPL has significant discretion to determine whether certain transmission infrastructure is a network upgrade and that its determinations are rarely challenged or denied at the FERC level." (OCA St. 1, pp. 21-22.) Do you agree with this characterization?

A. No. I do not agree with Witness Felder's characterization. While a transmission owner initially classifies facilities and records costs in accordance with applicable FERC requirements, those determinations are subject to FERC's jurisdiction and oversight. The inclusion of facilities and associated costs in transmission rate base is governed by FERC-approved tariffs, accounting rules, and cost allocation methodologies, and is not solely within PPL Electric's discretion.

PPL Electric applies a project-specific method that functionalizes costs based on the purpose and function of the facilities and distinguishes dedicated customer facilities from facilities that become part of the integrated transmission network. That method has been applied in prior projects and has been applied here. The fact that its determinations may not have frequently been challenged or denied does not establish that PPL Electric has unchecked discretion. It may instead reflect that the Company has applied a reasonable and supportable method consistent with the applicable regulatory framework.

Through the annual transmission formula rate process and other FERC proceedings, customers, state commissions, consumer advocates, and other interested parties have opportunities to review and challenge the prudency of transmission investments, the classification of facilities, and the inclusion of costs in transmission rates. FERC has the authority to investigate such challenges and, where appropriate, disallow the recovery of costs that do not satisfy applicable regulatory requirements.

Moreover, the frequency with which particular determinations are challenged or denied is not relevant to whether FERC is the appropriate forum for review. FERC has exclusive jurisdiction over the rates, terms, and conditions of interstate transmission service in the United States. Accordingly, questions regarding whether specific transmission facilities or costs are properly included in transmission rates are matters for FERC's review and determination. The existence of established FERC processes for review, challenge, and cost disallowance demonstrates that PPL Electric's treatment of transmission facilities is subject to regulatory scrutiny and is not unchecked.

Q. Is PPL Electric seeking Commission approval of the transmission costs related to the Project proposed in this proceeding?

A. No.

Q. OCA Witness Konidena testifies that PPL Electric is seeking Commission approval of the transmission costs related to the Project proposed in this proceeding.[14] Is that true?

[14] OCA St. 2, pp. 90

A. No. That is not an accurate characterization of the relief requested in this proceeding. PPL Electric is seeking approval to construct the Project. This proceeding does not seek approval of the Project's transmission costs, their future recovery, or their allocation among transmission customers. Those issues are outside the scope of this siting proceeding and are addressed through separate regulatory processes.

Q. Please explain why PPL Electric is not seeking the Commission's approval of the transmission costs or their allocation in this proceeding.

A. This proceeding is a transmission line siting proceeding, filed pursuant to 52 Pa. Code Chapter 57 Subchapter G. Through this filing, PPL Electric is requesting approval to construct approximately 1.1 miles of new parallel double-circuit 230 kV transmission facilities needed to connect the existing Susquehanna-Harwood #1 and #2 transmission lines to the New Tomhicken Switchyard.

The purpose and scope of a siting proceeding are fundamentally different from a transmission rate proceeding. Counsel has advised me that under the Commission's transmission siting regulations, the Commission evaluates issues such as the need for the proposed facilities, safety, environmental impacts, route selection, and compliance with applicable state laws and regulations. The regulations direct the Commission to consider whether the proposed transmission facilities are needed, whether they present an unreasonable risk to public health and safety, whether they comply with applicable environmental requirements, and whether they minimize adverse environmental impacts when compared to reasonable alternatives.

The Commission's transmission siting regulations do not contemplate a review of how the costs of those facilities will ultimately be recovered through wholesale transmission rates or how those costs may be allocated among transmission customers. While the application includes estimated construction costs, those estimates are provided as part of the project information presented to the Commission in support of the requested siting approval. The inclusion of estimated project costs in the application does not convert this proceeding into a rate case or a cost allocation proceeding.

As discussed above, the recovery of transmission costs through transmission base rates falls within FERC's jurisdiction. Whether specific facilities qualify for inclusion in transmission rate base, whether the associated costs are prudently incurred, and whether those costs are appropriately recovered from transmission customers are issues addressed through FERC-approved transmission tariffs and formula rate processes. Those proceedings provide opportunities for interested parties to review project costs, request information, and challenge the recovery or allocation of costs before FERC as noted above in this testimony.

Accordingly, PPL Electric is not seeking, and the Commission is not being asked to provide, approval of the recovery, allocation, or ratemaking treatment of the costs associated with the Tomhicken Project. Those questions will be addressed, as appropriate, through the FERC jurisdictional processes governing transmission cost recovery.

V. PPL ELECTRIC'S ANTICIPATED COST ALLOCATION

Q. How does PPL Electric currently anticipate treating Project costs for cost-allocation purposes?

A. As a part of discovery sought by OCA in this proceeding, PPL Electric has provided information related to a potential cost allocation that would assign a portion of project costs directly to the Customer in the form of a CIAC. The remaining portion of the project is proposed to be treated as a transmission investment that would be reflected in the transmission rate base and recovered, if approved, through PPL Electric's FERC jurisdictional transmission rates. As discussed above, the recovery and allocation of those costs are subject to FERC's regulatory oversight and applicable transmission ratemaking processes.

Specifically, PPL Electric estimates that approximately $21.5 million, or 36 percent, of the total project costs of $59.9 million, will be allocated directly to the Customer, while the remaining approximately $38.4 million, or 64 percent, is proposed for inclusion in transmission rate base and would be recovered through PPL Electric's transmission rates, subject to FERC review and approval.

Importantly, the cost allocation presented in this proceeding was presented in response to discovery issued by OCA and was intended to describe the Company's proposed treatment of project costs and the basis for that proposal. This proceeding does not determine the ultimate recovery or allocation of costs through transmission rates, which remain subject to FERC's jurisdiction. Counsel has advised me that PPL Electric's production of these materials in discovery does not limit its ability to object to its admissibility at an evidentiary hearing because discovery has a broader standard than that used for admission of evidence at a hearing, as recognized by the Presiding Officers in their Prehearing Order #3 issued on April 29, 2026.

Q. How did PPL Electric determine the cost allocation?

A. The Company uses a project-specific engineering and functional analysis to determine the allocation between facilities that primarily serve the Customer and facilities that provide broader transmission system benefits pursuant to PPL Electric's Policy on Cost Allocation for Large Customer Interconnections.[15] PPL Electric Witness Joseph Lookup discusses the Company's policy used to evaluate project components and develop the anticipated allocation between Customer-funded facilities and transmission system facilities in his rebuttal testimony. In general, the analysis evaluates the purpose and function of individual project elements to determine whether they are appropriately assigned directly to the Customer or treated as transmission infrastructure that supports the operation of the transmission system. The resulting allocation reflects the Company's engineering analysis regarding the respective benefits of the facilities. The allocation will be finalized based on final costs, and any amount allocated to the transmission system will be incorporated into the Company's annual FERC formula rate filing for review and inclusion in transmission rates.

To the extent any portion of the project is ultimately proposed for recovery through transmission rates, the appropriateness of that treatment remains subject to review through the applicable FERC jurisdictional processes discussed above.

Q. Please describe the components of this Project that PPL Electric has designated as network upgrades for inclusion in transmission base rates.

[15] OCA 1-6 Attachment 1 – PPL Electric Utilities Corporation – Policy on Cost Allocation for Large Customer Interconnections.

A. The network upgrade portion of the Project consists of transmission infrastructure that becomes part of the integrated transmission system and supports broader network operations. These facilities include transmission line enhancements, switchyard and substation infrastructure, system reinforcement projects, voltage support facilities, and other transmission assets designed to improve the performance and operation of the broader transmission network.[16] The Company determined that these facilities provide benefits beyond the interconnecting Customer and therefore are appropriately treated as network facilities. Consistent with the Company's Policy on Cost Allocation for Large Customer Interconnections, facilities that provide broader transmission system benefits may be included in transmission rate base.

Q. Please describe the components of this Project that the Customer is responsible for paying for.

A. The customer-funded facilities generally consist of the direct connection assets necessary to physically interconnect the Customer's facilities to the transmission system. These assets are dedicated to serving the Customer and function as the Customer's point of delivery from the transmission network. The Customer also pays for the broader transmission network through base transmission rates, which covers a portion of the upgrades included in this application and the existing facilities used to serve all transmission customers.

[16] See HIGHLY CONFIDENTIAL OCA-1-6 Attachment 2. Please note that this response provides a high-level summary of the network upgrade components of the Project and purposely does not provide specific information or details contained in that response that would necessitate highly confidential treatment.

Q. Is PPL Electric's approach to distinguishing customer-funded facilities from transmission system facilities consistent with PJM's interconnection planning framework?

A. Yes. PJM's interconnection planning framework distinguishes among different categories of facilities and does not treat all facilities associated with an interconnection request as a single category. PJM's System Impact Studies identify the Interconnection Facilities and Network Upgrades required to accommodate a project, provide estimates of cost responsibility, and identify the facilities needed to reliably integrate the project into the transmission system. PJM's Facilities Studies then perform the engineering analysis necessary to determine the modifications required to the transmission system and develop cost estimates for the Interconnection Facilities and Network Upgrades identified in the studies.[17]

PJM's Manual 14H explains that Interconnection Facilities are the facilities necessary to physically interconnect a customer to the transmission system. These facilities are distinguished from Network Upgrades, which are separately identified through PJM's study process. PJM separately identifies the required Network Upgrades through its study process and identifies the associated cost responsibility in accordance with the PJM Tariff.[18]

Consistent with that framework, PPL Electric evaluates facilities associated with large load interconnection requests on a facility-specific basis. Under the Company's Policy on Cost Allocation for Large Customer Interconnections, the company assesses the individual facilities to determine whether they function as facilities dedicated to physically

[17] Manual 14H, pp. 44-46. https://www.pjm.com/-/media/DotCom/documents/manuals/m14h.pdf
[18] Manual 14H, pp. 44-48. https://www.pjm.com/-/media/DotCom/documents/manuals/m14h.pdf

connecting and serving a customer or whether they perform broader transmission-system functions.[19] The resulting classification reflects the Company's engineering assessment of the facilities and their role within the transmission system. In my opinion, the policy and approach are consistent with the facility-specific engineering review contemplated by PJM's interconnection planning process and is intended to ensure that facilities are classified based on their function and use within the transmission system.

Q. Is PPL Electric's anticipated cost allocation reasonable and in line with FERC policy?

A. Yes. In my opinion, PPL Electric's anticipated cost allocation is reasonable because it is based on a project-specific engineering review that distinguishes between facilities that are dedicated to the Customer and facilities that become part of the integrated transmission network. Rather than relying solely on which party initiated the Project, the allocation considers the nature and function of the facilities that are ultimately constructed.

This approach is also consistent with the Company's Large Load Interconnection Cost Allocation Policy, which recognizes that direct customer connection facilities should be assigned to the customer, while network facilities that provide benefits to other customers and the transmission grid may appropriately be included in transmission rate base. The policy specifically identifies factors such as added reliability, increased capacity, reduced congestion, improved operational flexibility, resiliency, service to multiple customers, and support for future system needs as examples of network benefits that may justify treatment as transmission facilities.[20]

[19] OCA 1-6 Attachment 1 – PPL Electric Utilities Corporation – Policy on Cost Allocation for Large Customer Interconnections.

[20] OCA 1-6 Attachment 1 – PPL Electric Utilities Corporation – Policy on Cost Allocation for Large Customer Interconnections.

The anticipated cost allocation is also in line with PJM's approach where there is a distinction between facilities for customer connection and for network upgrades. It is important to note that under this framework, the Customer continues to contribute to network facilities over time through their base transmission rates.

I also believe the anticipated allocation appropriately avoids conflating customer-triggered facilities with customer-specific facilities. The fact that a customer request initiated the Project does not necessarily mean every resulting facility should be assigned exclusively to that customer. Some facilities are dedicated customer facilities and have appropriately been assigned to the Customer. Other facilities become integrated into the transmission network and provide broader system functions. The anticipated allocation recognizes that distinction and represents a reasonable application of the Company's policy and transmission cost allocation principles.

Finally, as discussed earlier, the ultimate treatment of any costs proposed for inclusion in transmission rate base remains subject to the applicable FERC review processes. I am offering this conclusion/opinion with respect to the reasonableness of PPL Electric's anticipated cost allocation in order to respond to the testimony advanced by OCA's witnesses, but continue to believe that these issues are outside the scope of this proceeding and outside the scope of the Commission's jurisdiction.

Q. OCA witness Konidena compares PPL Electric's anticipated cost allocation for this Project with that of another transmission line project placed in service in April 2026. (OCA St. 2, pp. 107-08.) What project is Mr. Konidena referring to?

A. Witness Konidena appears to be referring to PPL Electric's LON application for the Susquehanna 230kV and 500kV Transmission Line Project filed in Docket No. A-2025-3056806, which was approved by the Commission through a LON proceeding and involved the construction of new 230 kV and 500 kV facilities to serve a large new customer in Luzerne County.[21] The project included new transmission connections from the Susquehanna 230 kV, Susquehanna T10 230 kV, and Susquehanna 500 kV switchyards, with portions of the project scheduled to be placed in service beginning in April 2026. The cost allocation estimates associated with that project were substantially different from the allocation proposed for the Tomhicken Project. In the Susquehanna project filing, PPL Electric estimated total project costs of approximately $30.2 million, of which approximately $26.8 million, or 89 percent, was assigned to the customer and approximately $3.4 million, or 11 percent, was assigned to PPL Electric.

Q. Is this an appropriate comparison, in your view?

A. No. PPL Electric does not apply a fixed percentage or uniform allocation methodology across all large load projects. Rather, the Company evaluates each project individually based on the specific facilities being constructed and the extent to which those facilities provide benefits beyond the interconnecting customer. Consistent with that approach, the Susquehanna project involved a project-specific review that resulted in a project-specific determination that approximately 11 percent of the project costs should be borne by PPL Electric and the remainder by the customer.

[21] Susquehanna 230 kV and 500 kV Transmission Line Project, Docket Nos. A-2025-3056806 and P-2025-3056867, Order (entered Sept. 25, 2025)

Q. Did the Commission approve the cost allocation or cost recovery in the Susquehanna project?

A. No. The Commission's order approving the Susquehanna project expressly states that its approval "does not address the issues of accounting treatment, and cost recovery".[22] Consistent with that approach, PPL Electric is not seeking Commission approval in this proceeding of any accounting treatment, rate treatment, cost allocation, or cost recovery mechanism for the Tomhicken Project. Rather, this proceeding concerns the siting and construction of the proposed transmission facilities. In contrast, any future questions regarding project-specific accounting treatment or transmission cost recovery would be addressed through the applicable regulatory processes.

Q. Should the cost allocation used in the Susquehanna project be used as a benchmark for the reasonableness of PPL Electric's cost allocation for the Tomhicken Project?

A. No, the fact that the Susquehanna project resulted in an approximately 11% Company allocation does not establish that the same allocation would be appropriate here. The appropriate allocation depends on the specific facilities included in the project, their function within the transmission system, and the extent to which those facilities provide benefits beyond the interconnecting customer. Those project-specific considerations differ from one project to another and must be evaluated based on the facts of the particular project under review.

[22] Susquehanna 230 kV and 500 kV Transmission Line Project, Docket Nos. A-2025-3056806 and P-2025-3056867, Order (entered Sept. 25, 2025), pp. 9

Q. Are there any other important considerations or risks associated with the allocation of transmission costs?

A. Yes. An important consideration is ensuring that cost allocation reflects the function of the facilities being constructed. Facilities dedicated to serving a specific customer should be assigned to that customer, while facilities that become part of the integrated transmission network and provide broader reliability, operational, capacity, or flexibility benefits may be appropriately treated as network facilities.

OCA's approach would place primary emphasis on who triggered the Project rather than how the facilities function once constructed. In my view, that approach risks assigning network facilities to a single customer even when those facilities provide broader transmission system benefits. It would also require the Commission to make determinations regarding the allocation and recovery of transmission costs that are subject to FERC's jurisdiction and review processes.

For these reasons, I believe transmission cost allocation should remain tied to the specific engineering characteristics and functions of the facilities at issue and should be evaluated consistent with PPL Electric's Policy on Cost Allocation for Large Customer Interconnections. The Company applies that policy through a project-specific engineering and functional analysis to distinguish customer-specific facilities from facilities that provide broader transmission system benefits. Those determinations remain subject to applicable FERC review processes and should not be driven by generalized policy concerns raised in a transmission siting proceeding.

VI. ONGOING CUSTOMER CONTRIBUTION AND RATE IMPACTS

Q. How should the Commission evaluate potential rate impacts for existing projects related to the Project?

A. The Commission should evaluate potential customer rate impacts in light of the full regulatory and contractual framework applicable to transmission voltage customers, which is not in the scope of this proceeding. That framework includes the customer's responsibility for directly assigned facilities, the customer's ongoing payment of transmission charges, the applicable ESA and Tariff provisions and customer protections, and the FERC-regulated transmission cost recovery process. Accordingly, the analysis should not focus solely on the gross amount of Project costs anticipated to be included in transmission rate base but should also consider the Customer's ongoing contribution to the recovery of transmission system costs and the mechanisms designed to protect existing customers if the projected load does not materialize.

Q. In addition to funding the facilities directly assigned to it, will the Customer also contribute to the costs of the transmission system?

A. Yes. The Customer will be responsible for both its directly assigned facilities and its ongoing contribution toward transmission system costs.

First, the Customer will fund the facilities directly assigned to it, including the facilities required to physically interconnect the Customer to the transmission system. Consistent with the Company's large load cost allocation policy, these direct-connection facilities remain the responsibility of the interconnecting customer.

Second, under Rate Schedule LP-6, transmission-voltage customers are responsible for applicable transmission service charges, and the transmission component of the bill is

based on the customer's contribution to PJM peak load. As a result, once the Customer begins receiving service, it will contribute to the recovery of transmission system costs through the same FERC-jurisdictional transmission rate framework applicable to other transmission customers.

In addition, Rate Schedule LP-6 and the associated ESA include customer protection mechanisms such as customer-funded, directly assigned upgrades, security obligations, minimum load commitments, and exit-fee provisions designed to protect existing customers if projected load does not materialize or service is terminated before contractual obligations are satisfied. I discuss the LP-6 tariff in greater detail later in my testimony.

Q. Does the portion of project costs assigned to PPL necessarily represent a net burden on existing customers?

A. No. OCA's analysis focuses primarily on the gross amount of costs proposed for inclusion in the transmission rate base. However, the appropriate inquiry, in future proceedings and filings, is the net effect after considering both the incremental transmission investment and the incremental transmission revenues associated with the Customer's load.

Because the Customer will contribute to the recovery of transmission system costs through ongoing transmission charges based on its peak demand, it is not accurate to assume that every dollar anticipated for inclusion in transmission rate base translates directly into an equivalent burden on existing customers. Rather, the Customer will also contribute to the transmission billing base and help support recovery of transmission system costs in the same manner as other transmission customers.

Q. Has the Company evaluated the customer impacts, including the costs of the Project and the estimated revenues from the Customer over time?

A. Yes. PPL Electric evaluated a scenario in which approximately $38.4 million in Project costs are included in transmission rate base, together with approximately 12 MW of additional customer load. Under those assumptions, the Company estimated that transmission service charges would decrease across each customer class evaluated. While cost recovery does not require demonstrating a net rate reduction, the Company's analysis indicates that the Customer's projected load would contribute significantly to the recovery of the existing transmission system costs and any incremental transmission system costs included in the future.

The table below, provided in PPL Electric's response to Bureau of Technical Utility Services Data Request A-3, illustrates the estimated transmission rate impacts after accounting for both the incremental transmission investment and the Customer's incremental load contribution. Additional details related to this analysis are discussed by PPL Electric Witness Bethany L. Johnson.

Figure 1 – Estimated Transmission Service Charge Impact of Incremental Project Costs and Customer Load

	Current Rate As of January 1, 2026	~$38.4M Capital Investment + ~12 MW Increase	Difference
PPL Electric TSC Rate as of December 1, 2026			
Residential ($/kWh)	$ 0.03343	$ 0.03304	$ (0.00039)
Small Commercial & Industrial (SC&I) ($/kWh)	$ 0.03302	$ 0.03285	$ (0.00017)
Large Commercial & Industrial-Primary (LC&I-P) ($/kW)	$ 21.64700	$ 21.60000	$ (0.04700)
Large Commercial & Industrial-Transmission (LC&I-T) ($/kW)	$ 18.66300	$ 18.60700	$ (0.05600)

Q. What conclusion can be drawn from the Company's analysis of customer contributions and transmission rate impacts for this Project?

A. The analysis demonstrates that the Customer's contribution should not be evaluated solely based on the facilities directly assigned to it through CIAC. In addition to funding customer-specific facilities, the Customer will contribute to the recovery of transmission system costs through ongoing transmission charges based on its contribution to system peak demand.

Moreover, PPL Electric's analysis shows that when both the incremental transmission investment and the Customer's incremental load are considered together, transmission service charges are estimated to decline across all evaluated customer classes.

Accordingly, it would be incorrect to view the approximately $38.4 million anticipated for inclusion in transmission rate base as a direct or equivalent burden on existing customers. The Customer not only funds its dedicated facilities, but also contributes meaningfully to the recovery of transmission system costs through ongoing transmission charges.

VII. CUSTOMER-TRIGGERED VS. CUSTOMER-SPECIFIC INVESTMENTS

Q. OCA Witness Konidena suggests that because the Customer was the need driver for the project, the Customer, not ratepayers, should bear the costs of the infrastructure built to serve that need.[23] Do you agree?

[23] OCA St. 2, pp. 12

A. No. OCA's position effectively assumes that if a project would not have been built absent a particular customer request, then all facilities associated with that project should be assigned exclusively to the customer. In my view, that approach places too much emphasis on what initiated the Project and too little on the function of the facilities ultimately constructed.

A customer request may trigger the need for a project, but that does not mean every resulting facility is customer-specific, nor is it reasonable to expect only the incrementally needed facilities should be built. Moreover, once a customer requests service and satisfies the applicable requirements, PPL Electric has an obligation to provide service[24] and to identify the facilities necessary to safely and reliably serve that load. The relevant question is how the facilities function once they are placed in service and whether they provide benefits beyond the interconnecting customer.

Q. What is the distinction between customer-triggered and customer-specific facilities?

A. Customer-specific facilities are facilities dedicated to serving the interconnecting customer and generally provide little or no functional benefit beyond enabling that customer to receive service. These facilities are appropriately assigned to the customer.

Customer-triggered facilities are different. A customer-triggered facility is one whose need arises from a customer's request for service, but that may ultimately serve broader transmission functions. Such facilities may include both dedicated customer facilities and facilities that become integrated into the transmission network and provide broader reliability, operational, capacity, resiliency, or flexibility benefits.

[24] See 66 Pa.C.S. § 1501; 52 Pa. Code § 57.19(b).

Accordingly, a facility can be customer-triggered without being customer-specific. The fact that a customer initiated a project does not, by itself, determine the appropriate treatment of every facility included in that project.

Q. How do you respond to OCA's position that all but-for costs should be assigned to the customer?

A. A "but-for" test may help explain why a project was initiated, but it does not resolve the cost allocation analysis. If applied as the sole determinant of cost responsibility, a but-for standard would effectively treat every facility associated with a customer-driven project as customer-specific, regardless of the function the facility ultimately performs after it is placed in service.

Cost allocation should reflect both cost causation and facility function. Facilities dedicated solely to serving a particular customer should be assigned to that customer. However, facilities that become integrated into the transmission network and provide broader transmission benefits may be appropriately treated differently. The relevant inquiry is therefore not simply who triggered the Project, but whether the actual facilities built ultimately function as dedicated customer facilities or as part of the broader transmission system.

VIII. PHASE 1 / PHASE 2 AND FORWARD-LOOKING FACILITIES

Q. OCA Witness Konidena contends that certain facilities included in Phase 1 were designed to accommodate Phase 2 development and future load growth.[25] Does the

[25] OCA St. 2, pp. 75-78

inclusion of those forward-looking design features mean the facilities should be treated as customer-specific facilities?

A. No. The fact that a facility incorporates forward-looking design features does not, by itself, mean it should be treated as a customer-specific facility. The appropriate inquiry is not whether a facility may accommodate future expansion, but rather how that facility functions within the transmission system and whether it provides benefits beyond the interconnecting Customer.

The Company's Cost Allocation Policy for Large Customer Interconnections evaluates facilities based on their function and purpose within the transmission system. This includes support for future system needs, as well as other factors such as reliability, operational flexibility, and service to multiple customers.[26]

OCA's analysis places too much emphasis on whether a facility may also support future development and not enough emphasis on the facility's function. A facility does not become customer-specific simply because it was designed to accommodate future growth, or is the most economical choice. The relevant question is whether the facility is dedicated solely to serving the Customer or whether it becomes part of the integrated transmission network and provides broader transmission system benefits. The presence of forward-looking design features does not change the fundamental nature of the facility or its appropriate cost treatment.

[26] OCA 1-6 Attachment 1 – PPL Electric Utilities Corporation – Policy on Cost Allocation for Large Customer Interconnections.

Q. Does the fact that certain Phase 1 facilities were designed to accommodate future load growth mean PPL Electric should have constructed only the minimum facilities necessary to serve the Customer's initial load requirements?

A. No. Transmission facilities are long-lived assets and often exhibit significant economies of scale. A switchyard, transmission line, breaker position, or protection system generally cannot be constructed in precise increments that match each megawatt of customer demand. As a result, prudent transmission planning requires consideration of anticipated load growth, engineering and reliability standards, operational flexibility, and the costs of future expansion or reconstruction.

Designing every project solely around a customer's initial load requirement could result in repeated construction as additional load develops. That approach may lead to duplicative facilities, additional outages, repeated permitting and environmental impacts, and higher long-term costs. In some circumstances, constructing a scalable facility initially is more efficient than building only the minimum facilities needed today and replacing or expanding them shortly thereafter.

The mere fact that a facility is sized or configured to accommodate future needs does not determine who should ultimately bear its costs. Cost responsibility should continue to be evaluated based on the function of the facility and the benefits it provides within the transmission system.

This principle is consistent with the nature of an integrated transmission network. Transmission systems are designed to provide shared reliability, operational flexibility, and network access. A facility does not become permanently customer-specific simply because

one customer initially created the need for it. The appropriate inquiry remains how the facility functions once placed into service.

Q. Does the presence of forward-looking design features mean those costs should automatically be assigned to the customer?

A. No, forward-looking design features should be evaluated in the context of the engineering justification supporting the facility and the role the facility performs within the transmission system.

If a design choice avoids inefficient reconstruction, preserves operational flexibility, improves reliability, increases system resiliency, or allows the facility to function more effectively as part of the integrated transmission network, those considerations are relevant to evaluating the facility's reasonableness and cost treatment.

Evaluating facilities solely based on the minimum infrastructure needed to satisfy immediate requirements may produce inefficient outcomes. If utilities are required to construct only for today's needs and later rebuild those same facilities to address foreseeable system requirements, the result may be higher long-term costs, additional outages, and greater operational disruption.

Ultimately, the appropriate treatment of a facility depends on its function and the benefits it provides to the transmission system, not simply on whether it was designed with future operational needs in mind.

IX. TARIFF ISSUES

Q. To what extent are the tariff-related issues raised by Witness Felder relevant to the Commission's decision in this proceeding?

A. The tariff-related issues raised by Witness Felder are outside the scope of the relief requested in this proceeding. PPL Electric is seeking approval to construct transmission facilities through a Letter of Notification proceeding. The Company is not seeking approval of a new tariff, modifications to Rate Schedule LP-6, or approval of new statewide large-load policies.

Many of the subjects addressed by Witness Felder, including customer funding obligations, security requirements, stranded-cost protections, minimum load commitments, credit support provisions, and other large-load tariff protections, were recently considered by the Commission in PPL Electric's distribution rate case and in the Commission's broader large-load proceedings. Other issues, including resource adequacy, large load registries, and RBP, are currently being addressed through PJM and FERC processes.

While I do not believe this proceeding is the appropriate forum for adopting the tariff changes proposed by Witness Felder, I nevertheless address the issues he raises because he relies on those issues as support for imposing additional conditions on the Project. As discussed below, many of the concerns identified by Witness Felder have already been addressed through LP-6, the Customer's ESA, prior Commission proceedings, or ongoing PJM and FERC processes.

Q. In his direct testimony, OCA witness Felder proposes a number of changes to PPL Electric's retail tariff that he asks the Commission to require as a condition of approval of this LON. Please summarize these proposals.

A. Witness Felder proposes an Expansion Rate Policy that would require a negotiated rate structure over the duration of a long-term contract. This is similar to the CIAC approach

with the main difference being all expansions to the transmission system are included and that costs are depreciated over the term of the contract and it would include return on equity much like the process for base transmission rates.[27] Witness Felder also proposes six additional additions to PPL's tariff.[28]

- The first is a Large Load Registry which is a public database that requires large loads to register and provide information regarding the nature of the connection.
- The second is a large load supply requirement would require the large load to have procured new PJM qualified capacity resources if at the time of connection there is insufficient capacity or the load would be curtailed when required.
- The third is a PJM Reliability Backstop Procurement ("RBP") Cost Allocation Stipulation which would require PPL Electric to allocate any costs associated with the RBP to be allocated to large loads.
- The fourth is a Large Load Stranded Cost allocation which supports the expansion rate policy by requiring transmission and distribution costs to be directly assigned to the large load and ensuring that if the customer fails to reach projected load level or exits early, the existing ratepayers are protected.
- The fifth is a large load credit and collateral provision to protect against financial risk and stranded investments by ensuring large load provide sufficient credit support and collateral.

[27] OCA St. 1, pp. 23-24
[28] OCA St. 1, pp. 25-30

- The sixth is a Large Load Curtailment Provisions to ensure residential and ordinary customers are protected in reliability emergencies by curtailing large loads before residential customers.

Q. Do you agree with these proposals?

A. No. I do not believe these proposals provide a basis for imposing new tariff requirements as a condition of approval of this LON. Some of the risks identified by Witness Felder are already addressed through the Customer's ESA and PPL Electric's recently approved LP-6 tariff. Other issues, including large load information reporting, resource adequacy, RBP, and treatment of large loads during resource adequacy events, are being addressed through Commission, PJM, and FERC processes. For that reason, this individual siting case is not the appropriate vehicle for imposing new statewide or regional large load requirements.

I address several of Witness Felder's specific proposals below. As a general matter, however, the existence of ongoing PJM and FERC proceedings reinforces why these issues should not be resolved through project-specific LON conditions.

For the large-load supply requirement, PJM and FERC are addressing resource adequacy issues through regional processes, including the Interim Resource Adequacy Service framework described in the PJM Board Letter. To the extent final rules require new Large Loads to bring capacity, take service under an interim resource adequacy construct, or coordinate through the entity serving the load, those obligations should be first defined by PJM and FERC and then, as noted by the PJM board, implemented by Electric Distributors. They should not be imposed by requiring PPL Electric to make project-specific generation sufficiency determinations as a condition of this LON.

For the RBP proposal, Witness Felder seeks to establish tariff provisions addressing a regional PJM mechanism before FERC has acted on PJM's filing and before the final implementation details have been approved. I address that proposal more specifically below.

For the large load curtailment proposal, emergency load control is already governed by Commission regulations, utility load-control procedures, PPL Electric's tariff, and PJM operating requirements. I address below why those established procedures should not be replaced by a project-specific curtailment condition in this LON.

More broadly, Witness Felder's testimony overlooks the extent to which these issues are already being addressed through existing regulatory and contractual mechanisms. With respect to stranded cost allocation, credit support, and collateral requirements, I agree that customer nonperformance and stranded cost risk are legitimate issues. However, those risks should be addressed through tariff provisions and ESAs that address collateral requirements, security obligations, minimum load commitments, termination provisions, and other contractual safeguards, not by assuming that all facilities associated with a customer-driven project should be assigned exclusively to that customer regardless of function.

Importantly, many of the protections Witness Felder seeks already exist in PPL Electric's tariff. Rate Schedule LP-6 requires customers to provide security for costs associated with upgrades needed to serve the customer, including certain upgrades placed into transmission rate base. It also requires customer funding of directly assignable

transmission and distribution upgrades through CIAC payments.[29] These provisions are specifically designed to address stranded cost and customer nonperformance risk.

Q. PPL Electric recently concluded a distribution rate case before the Commission at Docket No. R-2025-3057164. Please describe the large load tariff issues that were before the Commission for consideration in that rate case.

A. In PPL Electric's most recent distribution rate case, the Commission considered and ultimately approved, through a negotiated settlement, new tariff provisions applicable to large load customers taking service at transmission voltages. These provisions were incorporated into new PPL-Rate LP-6 Large Load Interconnections, which became effective as part of the rate case resolution.[30]

Rate Schedule LP-6 was developed specifically to address many of the policy and cost allocation issues associated with large load interconnections that are also raised by OCA in this proceeding. Among other things, LP-6 establishes customer-specific requirements relating to ESAs, customer funding of directly assignable transmission and distribution upgrades through CIAC, security obligations associated with certain upgrades placed into transmission rate base, minimum load commitments, exit-fee provisions, load ramp requirements, and other measures designed to protect existing customers from stranded cost risk.

Importantly, the issues surrounding large load interconnections were actively litigated and negotiated in the rate case. The settlement reflects the parties' consideration

[29] LP-6 – Large Load Interconnections Original, https://www.pplelectric.com/site/more/about-us/electric-rates-and-rules/current-electric-tariff.
[30] Docket No. R-2025-3057164, Order (entered June 4, 2026).

of how large load customers should contribute to the costs they cause and what protections should be implemented to address concerns regarding customer nonperformance, stranded costs, and long-term load uncertainty. The settlement also recognized that certain large load issues remained under consideration in the Commission's statewide large load model tariff proceeding and preserved parties' rights to seek future modifications to the tariff following that proceeding[31], in which an order was issued on May 12, 2026[32].

As a result, many of the subjects addressed by Witness Felder in this proceeding, including customer funding obligations, credit support, collateral requirements, minimum load commitments, and protections against stranded costs, were already before the Commission in Docket No. R-2025-3057164 and were addressed through the approved LP-6 tariff framework.

Accordingly, the Commission has very recently considered these large load tariff issues in a dedicated ratemaking proceeding and approved a tariff specifically designed to address them. In contrast, the present proceeding is a transmission siting case, involving a specific request to site and construct specific HV transmission lines, and does not involve a request to modify PPL Electric's retail tariff.

Q. Is Rate Schedule LP-6 currently effective?

A. Yes, Rate Schedule LP-6 went into effect on July 1, 2026, and is applicable to a customer that meets the requirements of the rate schedule if the customer's service commenced on or after October 1, 2025.[33]

[31] Docket No. R-2025-3057164, Order (entered June 4, 2026), pp. 36 item 97.
[32] Docket No. M-2025-3054271, Order (entered May 12, 2026).
[33] Docket No. R-2025-3057164, Order (entered June 4, 2026), pp 225

Q. Does Witness Felder's testimony contain any analysis of whether Rate Schedule LP-6 contains any of the protective tariff measures he is proposing?

A. Not that I have identified. Witness Felder does not appear to evaluate the stranded cost protections already contained in Rate Schedule LP-6 and associated ESA, including CIAC requirements, Rate Base Security Obligations, minimum load commitments, exit-fee provisions, and other customer protection mechanisms.

Q. Please describe the protective measures in Rate Schedule LP-6 that will shield ratepayers from any stranded costs associated with this Project.

A. The LP-6 tariff was specifically developed to address many of the same stranded cost and customer nonperformance concerns identified by Witness Felder. Together, the LP-6 tariff and the Customer's ESA contain several mechanisms designed to protect existing customers from stranded cost risk associated with large load projects.

First, the tariff requires the customer to fund directly assignable transmission and distribution facilities through CIAC payments. As a result, facilities dedicated to the customer are not initially funded by other customers.

Second, LP-6 includes a Rate Base Security Obligation that requires customers to provide security associated with certain transmission investments made to serve the customer, including costs that otherwise would be recovered through transmission rates.

Third, the tariff and ESA include minimum load commitments, security requirements, ongoing payment obligations, and other provisions designed to ensure that

customers contribute to system cost recovery even if load develops more slowly than anticipated.

Finally, the tariff and ESA contain exit-fee, default, and other contractual provisions intended to protect customers if a large load customer fails to satisfy its obligations or terminates service before the end of its contractual commitments.

Taken together, these provisions provide substantial protection against the risks that a customer's projected load does not materialize, develops more slowly than expected, or terminates service before fulfilling its obligations.

Q. Has OCA been provided a copy of the ESA through discovery in this proceeding?

A. Yes. PPL Electric provided a confidential copy of the ESA on April 15, 2026 in response to OCA's request OCA 1-1.

Q. Does Mr. Felder's testimony contain any analysis of whether PPL Electric's existing ESA with the Customer will protect ratepayers from stranded costs associated with this Project?

A. Not that I have identified. While Witness Felder raises concerns regarding customer nonperformance, stranded costs, and financial risk, I am not aware of any analysis in his testimony evaluating the specific protections contained in the Customer's ESA or assessing whether those provisions are sufficient to address the risks he identifies.

In evaluating stranded cost risks, it is important to consider both the applicable tariff protections and the project-specific protections contained in the ESA.[34] Instead, Witness

[34] PPL Electric has advised me that it is in the process of renegotiating the existing ESA for the Tomhicken Project to be consistent with the recently-approved Rate Schedule LP-6.

Felder generally advocates for additional tariff requirements without evaluating the customer-specific contractual protections that already exist for this Project.

Q. Please respond to Mr. Felder's proposal to require PPL Electric to maintain a publicly available database or "registry" for large loads that includes the information set forth in OCA Statement No. 1, page 26, line 8 through page 27, line 8.

A. As discussed above, PJM is already developing a regional Large Load Registry through the PJM and FERC processes. The PJM Board Letter states that PJM will develop and maintain a registry of large loads and that Electric Distributors will provide information necessary to improve load forecast accuracy and transparency and administer related resource adequacy processes. Given that regional framework, it would be premature and potentially duplicative to require PPL Electric to create a separate registry as a project-specific condition in this LON.

Q. Please respond to Mr. Felder's proposal to require PPL Electric to adopt tariff or minimum service agreement provisions requiring large load customers to have procured new PJM qualified capacity resource if PJM does not have sufficient capacity at the time the customer interconnects. (OCA St. 1, page 26, line 9 through page 27, line 9.)

A. As discussed above, FERC and PJM are already examining resource adequacy issues associated with accelerating large load growth in PJM. The July 27, 2026 PJM Board decisional letter was issued after Witness Felder filed his testimony in this proceeding,

which demonstrates that many of the concerns raised by Witness Felder are already being addressed by PJM and FERC, rather than reflecting a regulatory or policy gap.

The PJM Board Letter directs PJM to pursue a FERC filing that includes an Interim Resource Adequacy Service for new Large Loads that do not bring sufficient capacity to serve their resource adequacy needs and cannot otherwise be served at the applicable 1-in-10 reliability standard. The Board letter also states that new Large Loads wishing to receive the same level of firm service as other load will need to bring sufficient new capacity to the system or otherwise take service under the Interim Resource Adequacy Service. These are regional market and resource adequacy issues being addressed through PJM and FERC processes.[35] While Electric Distributors may be tasked with implementing this program, this does not mean it should be addressed as a part of a singular transmission siting case taking place in one PJM state before one regulatory Commission. Large load policy and resource adequacy issues are evolving rapidly, with ongoing developments at PJM and FERC. Recent actions demonstrate that these issues are actively being evaluated through the appropriate regulatory processes, providing little basis to conclude that the concerns identified by Witness Felder will go unaddressed absent action in this narrow proceeding.

Moreover, Witness Felder's proposal would require PPL Electric to make project-specific resource adequacy determinations and condition service for one class of retail customers before the PJM and FERC regional framework has been accepted and implemented. PPL Electric's role in this proceeding is to identify the transmission facilities needed to safely and reliably interconnect and serve the requested load under applicable transmission planning criteria. Broader questions regarding whether a new large load must

[35] PJM Interconnection, L.L.C., Board Decisional Letter on Critical Issue Fast Path – Reliability Backstop Procurement and Connect and Manage (July 27, 2026).

bring capacity, take service under an interim resource adequacy construct, or bear particular resource adequacy costs are being addressed in the PJM and FERC processes described above. For these reasons, I do not believe Witness Felder's proposal should be considered or adopted as a condition of approval of this Project.

Q. Please respond to Mr. Felder's proposal to require PPL Electric to adopt tariff or minimum service agreement provisions requiring PPL Electric to assign all PJM RBP costs to interconnecting large load customers. (OCA St. 1, p. 28.)

A. Witness Felder's proposal concerns PJM's Reliability Backstop Procurement, which is already being addressed through PJM and FERC processes. Recently, the PJM Board Letter directed PJM to proceed with a FERC filing establishing an RBP framework and described how the resulting obligations and costs would be administered and allocated.

Accordingly, Witness Felder is asking the Commission to establish a project-specific allocation rule for a regional PJM program before FERC has acted on PJM's filing and before the final rules have been approved. I do not believe that is an appropriate use of this LON proceeding. If RBP obligations are ultimately approved, their implementation and allocation should be addressed through the PJM and FERC processes established for that purpose, rather than through a condition attached to an individual transmission siting case.

For that reason, I do not believe it would be appropriate to modify PPL Electric's tariff in this proceeding to address an RBP framework that remains subject to FERC review and implementation through PJM's tariff and related processes.

Q. Please respond to Mr. Felder's proposal to require PPL Electric to "ensure that all large loads are curtailed before residential consumers and subject to substantial, timely state penalties." (OCA St. 1, p. 29.)

A. I do not agree with that proposal. Pennsylvania already has a regulatory framework governing emergency load control and emergency energy conservation. Under 52 Pa. Code § 57.52, electric utilities are required to maintain load control procedures, including load shedding priorities, and may reduce or interrupt service during emergency conditions in accordance with those procedures. The regulation does not mandate that all large load customers be curtailed before residential customers. Instead, it requires utilities and grid operators to manage emergencies in a manner that maintains system reliability and protects the integrity of the electric system.

Consistent with that framework, PPL Electric's tariff permits the Company to reduce or interrupt service during emergency conditions in accordance with its load control procedures. Witness Felder's proposal would replace those established reliability procedures with a blanket curtailment mandate based solely on customer class. In my view, emergency load-control decisions should continue to be governed by applicable reliability requirements, utility operating procedures, and system conditions rather than an automatic rule requiring all large load customers to be curtailed before residential customers.

Moreover, PJM is pursuing a regional framework governing service during periods of insufficient resource adequacy. Again, referencing recent action by PJM, the July 27, 2026 PJM Board Letter proposes that Electric Distributors will be required to implement an Interim Resource Adequacy Service for new Large Loads that, as of June 1, 2027, do not bring sufficient capacity to serve their resource adequacy needs and cannot otherwise

be served at the 1-in-10 reliability standard, and that load reductions under that service will occur before deployment of Pre-Emergency Load Management. That proposal is expected to be addressed through PJM's FERC filing and related implementation processes.[36] It should not be converted into a separate, project-specific curtailment mandate in this LON.

Given the existing Pennsylvania regulatory framework and ongoing PJM proceedings, I do not believe it would be appropriate to consider or impose a project-specific curtailment mandate in this proceeding. Rather, emergency load control decisions should continue to be addressed through established reliability procedures and applicable regulatory requirements.

Q. How was the issue of mandatory curtailment addressed in the Commission's recent Interconnection and Tariffs for Large Load Customers proceeding?

A. The Commission declined to adopt mandatory curtailment for large loads, citing it could constitute discriminatory service. Instead, the Commission recommended continuing with voluntary interruptible service because it provided enough incentive for large load customers to consider adopting it.[37] Rate Schedule LP-6 includes a voluntary interruptible service option that provides customers with modified service terms in exchange for accepting the possibility of service interruptions. LP-6 also requires customers with critical load to design their facilities so that critical and non-critical load can be separated and non-critical load can be shed during load shedding events without affecting critical operations.[38]

[36] PJM Interconnection, L.L.C., Board Decisional Letter on Critical Issue Fast Path – Reliability Backstop Procurement and Connect and Manage (July 27, 2026). https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2026/20260727-board-decisional-letter-on-cifp-reliability-backstop-procurement-and-connect-and-manage.pdf.

[37] Docket No. M-2025-3054271, Order (entered May 12, 2026), pp. 91-92.

[38] LP-6 – Large Load Interconnections Original, pp. 35E https://www.pplelectric.com/site/more/about-us/electric-rates-and-rules/current-electric-tariff.

Q. More generally, do Witness Felder's proposals provide a basis for imposing new tariff requirements as a condition of approval of this LON?

A. No. For the reasons discussed above, Witness Felder's proposals do not provide a basis for considering or imposing new tariff requirements as a condition of approval in this LON. This proceeding should remain focused on PPL Electric's request for siting approval, while broader tariff, resource adequacy, and market-design issues proceed in the forums established for those issues.

X. RESOURCE ADEQUACY

Q. To what extent are resource adequacy issues relevant to the Commission's decision in this proceeding?

A. Resource adequacy issues arguably provide important background context, but they are not the subject of the relief requested in this proceeding. PPL Electric seeks approval to construct transmission facilities necessary to serve the Customer's requested load. The Company is not seeking approval of resource adequacy rules, generation procurement requirements, PJM market reforms, or other policies governing how sufficient generation resources are maintained across the PJM region.

Questions regarding whether adequate generation resources exist to meet growing demand are principally addressed through PJM's resource adequacy processes and FERC-jurisdictional market rules. By contrast, PPL Electric's role in this proceeding is to evaluate whether the transmission system can safely and reliably accommodate the requested load and to identify any facilities necessary to satisfy applicable transmission planning and reliability standards.

Accordingly, while resource adequacy concerns have been raised by Witness Felder as a basis for imposing additional conditions on this Project, those concerns do not provide a basis for denying the LON or imposing new resource adequacy requirements that have not been adopted through the appropriate Commission, PJM, or FERC processes. Nevertheless, because Witness Felder relies on these issues in support of his recommendations, I address them below.

Q. OCA witness Felder references a number of policies being advanced by the White House, FERC, PJM, NERC, and Pennsylvania Governor Shapiro to address resource adequacy concerns caused by increased data center development. (*See, e.g.*, OCA St. 1, pp. 10-16.) How do these policies impact transmission owners like PPL Electric?

A. Most of the policies identified by Witness Felder address resource adequacy, generation supply, PJM market rules, or broader large-load policy. They do not change PPL Electric's responsibility in this LON to identify the transmission facilities needed to safely and reliably serve the requested load under applicable transmission planning criteria.

In the PJM Board Letter, the Board directed PJM management and staff to proceed with a FERC filing that includes a Large Load Registry, RBP, Interim Resource Adequacy Service for certain new Large Loads, and compensation for reduced load. The Board described these initiatives as directed at resource adequacy concerns caused by rapid load growth, tightening supply, and the need to maintain reliability while addressing the costs associated with new Large Loads through appropriate regional and state processes.[39]

[39] PJM Interconnection, L.L.C., Board Decisional Letter on Critical Issue Fast Path – Reliability Backstop Procurement and Connect and Manage (July 27, 2026). https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2026/20260727-board-decisional-letter-on-cifp-reliability-backstop-procurement-and-connect-and-manage.pdf.

Accordingly, the concerns raised by Witness Felder regarding resource adequacy, large load growth, and system reliability are already being examined through PJM stakeholder processes and FERC proceedings specifically focused on wholesale market design and resource adequacy. Those issues are distinct from the transmission siting and cost allocation questions presented in this proceeding.

Q. Did the Commission address resource adequacy in its recent Interconnection and Tariffs for Large Load Customers proceeding?

A. No. The Commission's recent Interconnection and Tariffs for Large Load Customers proceeding focused on protecting existing customers from potential stranded costs associated with serving large load customers and establishing appropriate cost allocation safeguards. The Commission did not adopt a "bring your own generation" requirement, require large load customers to demonstrate access to generation resources, or condition service on a showing that sufficient existing supply was available to serve the new load. Rather, the proceeding addressed cost responsibility and customer protections, not resource adequacy.

Q. OCA witness Felder uses the terms “reliability” and “resource adequacy” interchangeably. Does this accurately capture the reliability concerns addressed by transmission operators like PPL Electric when large load customers request transmission level service?

A. No. Resource adequacy and transmission reliability are distinct concepts. Resource adequacy concerns whether sufficient generation resources are available to serve customer

demand. By contrast, the reliability analyses performed by transmission operators such as PPL Electric focus on whether the transmission system can safely and reliably accommodate the new load without creating thermal, voltage, stability, or other North American Electric Reliability Corporation ("NERC") reliability violations.

When a large load customer requests transmission level service, PPL Electric studies the impact of that load on the transmission system and identifies any upgrades needed to ensure the grid continues to operate safely and reliably under applicable planning criteria. The Project at issue in this proceeding was designed to address transmission reliability and operational impacts associated with serving the Customer's load, not to resolve broader questions regarding the adequacy of generation resources across the PJM region.

XI. CONCLUSION

Q. Does this conclude your Rebuttal Testimony at this time?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

John D. Taylor

CEO

Mr. John D. Taylor is the Co-Founder and Chief Executive Officer of Atrium Economics and a senior regulatory economist with more than twenty years of experience advising electric and natural gas utilities across the United States and Canada. Mr. Taylor has served as a lead expert in rate and regulatory proceedings across more than 20 jurisdictions in the United States and Canada. His testimony has been presented before the Federal Energy Regulatory Commission, numerous state public utility commissions, provincial utility regulators, and trial courts.

He has testified on matters including revenue requirements, class cost of service, advanced rate design, revenue stabilization mechanisms, affiliate transactions, demand forecasts, return on equity, lead lag studies, audit testing, and infrastructure cost recovery. In addition to matters in which he was the lead witness, he has supported over one hundred engagements for other expert witnesses, contributing to the development and defense of analytical models, regulatory strategy, and evidentiary submissions.

Mr. Taylor's experience spans vertically integrated electric utilities, gas distribution utilities, transmission providers, pipeline operators, municipally owned utilities, and multi-state holding companies. He has also served as market monitor for ISO New England's capacity market and has supported wholesale power purchase agreement evaluations and generation feasibility and prudence analyses. He regularly advises executive leadership and boards on regulatory strategy, risk allocation, revenue stability, infrastructure investment, and long-term rate design considerations.

In addition to his consulting leadership, Mr. Taylor served as Chief Executive Officer of a non-destructive testing and industrial inspection firm serving the power generation, petrochemical, and heavy industrial sectors. That role provided direct experience in capital-intensive infrastructure operations, asset integrity management, maintenance planning, safety compliance, and operational risk oversight. This operating perspective informs his work in utility capital planning, infrastructure expansion review, and regulatory cost recovery.

EDUCATION

M.A., Economics, American University

B.A., Environmental Economics, University of North Carolina at Asheville

YEARS EXPERIENCE

20

RELEVANT EXPERTISE

Revenue Requirements & Capital Recovery, Class Cost of Service & Advanced Rate Design, Revenue Stabilization Mechanisms, Demand Forecasting & Resource Planning, Natural Gas & Pipeline Infrastructure Analysis, Return on Equity & Capital Structure, Affiliate Transactions & Operational Audits, Transmission & FERC Matters, Transaction Advisory & Regulatory Due Diligence

EXPERT WITNESS TESTIMONY PRESENTATION

UNITED STATES:

- California Superior Court of California
- Delaware Public Service Commission
- Florida Public Service Commission
- Federal Energy Regulatory Commission
- Illinois Commerce Commission
- Indiana Utility Regulatory Commission
- Maine Public Service Commission
- Maryland Public Service Commission
- Massachusetts Department of Public Utilities
- Minnesota Public Utilities Commission
- Tennessee Public Utility Commission
- New Hampshire Public Utilities Commission
- North Carolina Utilities Commission
- North Carolina – Brunswick Superior Court
- Oregon Public Utility Commission
- Ohio Public Utility Commission
- Pennsylvania Public Utility Commission
- South Carolina Public Service Commission
- Virginia State Corporation Commission
- Washington Utilities and Transportation Commission
- Public Service Commission of West Virginia

CANADA:

- Alberta Utilities Commission
- British Columbia Utilities Commission
- Ontario Energy Board

REPRESENTATIVE EXPERIENCE

RATE DESIGN AND REGULATORY PROCEEDINGS

Mr. Taylor has extensive experience developing and evaluating utility revenue requirements, including review of test year construction, pro forma adjustments, operating expense normalization, capital investment recovery, depreciation and amortization treatment, and cash working capital analyses, including lead-lag studies. He has assessed prudence and regulatory treatment of major capital programs, infrastructure modernization initiatives, and incremental investment proposals. In addition, Mr. Taylor has designed and evaluated revenue stabilization mechanisms, including Weather Normalization Adjustments, Revenue Adjustment Mechanisms, and other forms of decoupling and revenue recovery tools. His work includes back-casting analyses, risk assessment modeling, and evaluation of tradeoffs between customer bill stability and utility revenue certainty. He has testified regarding both the technical design and policy implications of such mechanisms in contested regulatory proceedings.

CLASS COST OF SERVICE AND RATE DESIGN

Mr. Taylor has extensive experience developing and defending embedded and marginal class cost of service studies in contested regulatory proceedings across the United States and Canada. His work includes functionalization, classification, and allocation of utility costs; development of jurisdictional and class revenue requirements; and evaluation of fixed-variable cost recovery methodologies. He has designed and evaluated residential, commercial, and industrial rate structures, including demand-based rates, time-of-use designs, economic development tariffs, and revenue apportionment strategies. Mr. Taylor has also assessed rate stability, equity considerations, and cost causation principles in the context of evolving load patterns, electrification, and policy-driven rate reforms.

DEMAND AND CUSTOMER FORECASTING

Mr. Taylor has extensive experience developing and evaluating demand and customer forecasting models for electric and natural gas utilities. His work includes econometric modeling of customer growth, usage normalization, peak demand forecasting, and weather-sensitive load analysis. He has assessed forecast methodologies for rate proceedings, infrastructure planning, and resource adequacy evaluations, including review of macroeconomic drivers, demographic trends, and end-use consumption patterns. Mr. Taylor has also evaluated forecast inputs used in capital planning, pipeline capacity assessments, LNG resource planning, and revenue requirement development. His experience includes back-casting analyses, scenario modeling, and sensitivity testing to assess forecast risk and regulatory defensibility. He has testified regarding forecast methodology, assumptions, and alignment with regulatory standards in contested proceedings.

RETURN ON EQUITY AND CAPITAL STRUCTURE

Mr. Taylor has provided testimony and advisory analysis regarding return on equity and capital structure for regulated electric and natural gas utilities in both transmission and distribution contexts. His work includes evaluation of regulatory capital structures, cost of capital components, and risk considerations associated with infrastructure investment, revenue stability mechanisms, and business model evolution. He has supported financial modeling in rate proceedings, including assessment of cash flow implications, earnings stability, and alignment between authorized returns and underlying business risk. Mr. Taylor has also evaluated the interaction between capital structure, revenue recovery mechanisms, and regulatory policy objectives, including the treatment of large capital programs and expansion initiatives.

TRANSACTION ADVISORY AND REGULATORY DUE DILIGENCE

Mr. Taylor has advised utilities and infrastructure stakeholders in connection with asset acquisitions, divestitures, and wholesale power supply evaluations. His transaction experience includes regulatory due diligence, evaluation of revenue requirements and rate structures, infrastructure risk assessment, and financial modeling to support investment decisions. Mr.

Taylor has advised on regulated utility and energy infrastructure transactions, including buy-side and sell-side evaluation of utility operations and generation asset divestitures. His work has included assessment of revenue requirements, rate structures, customer forecasts, regulatory risk, operational performance, and capital recovery considerations to support informed investment decisions. His advisory work has also included evaluation of comparable utility transactions, merger activity, and regulatory approval considerations affecting infrastructure investment decisions.

NATURAL GAS INFRASTRUCTURE & RESOURCE PLANNING EXPERIENCE

Mr. Taylor has extensive experience supporting natural gas utilities and pipeline operators in forecasting, peak demand planning, LNG resource evaluation, balancing mechanisms, transportation modeling, and line extension reviews. His work includes demand forecasting for local distribution companies, evaluation of peak day planning standards, LNG peaking facility analyses, storage utilization review, pipeline transport cost allocation, and balancing service design. He has evaluated integrated resource planning approaches, supply portfolio risk assessment, and incremental pipeline capacity expansion proposals. His experience includes review of expansion economics, regulatory treatment of new infrastructure investment, and cost recovery mechanisms associated with large capital programs. Mr. Taylor has also assessed alignment between demand forecasts, contracted capacity, storage strategy, and long-term system reliability objectives, providing analytical support for regulatory filings and board-level capital planning decisions.

AFFILIATE RELATIONSHIPS & PERFORMANCE REVIEWS

Mr. Taylor has led and supported affiliate transaction reviews, shared services cost allocation studies, and operational performance assessments in both U.S. and Canadian jurisdictions. His work includes evaluation of overhead allocation methodologies, overhead capitalization practices, and cost recovery treatment associated with corporate support functions, transmission-related shared assets, and early contractor engagement for major infrastructure projects. He has assessed capitalization rates, allocation between transmission and distribution functions, and cost attribution to regulated versus affiliate activities, ensuring consistency with regulatory standards and precedent. His experience includes shared assets studies, evaluation of contractor cost structures in large capital programs, and review of governance controls supporting regulatory compliance. In addition, Mr. Taylor has conducted operational audits and benchmarking analyses addressing operations and maintenance (O&M) and administrative and general (A&G) expenses. His work includes comparative peer analysis, assessment of cost drivers, and evaluation of organizational efficiency and cost discipline in regulated utility environments.

PROFESSIONAL EXPERIENCE

CO-FOUNDER & CHIEF EXECUTIVE OFFICER | ATRIUM ECONOMICS | 2020 – PRESENT

Leads a regulatory advisory firm serving electric and natural gas utilities across the United States and Canada. Serves as lead expert witness in rate and regulatory proceedings and oversees firm strategy, analytical methodology, and evidentiary quality control. Advises executive leadership and boards on revenue requirements, rate design, infrastructure investment, and regulatory risk.

CHIEF EXECUTIVE OFFICER | NOVA DATA TESTING | 2019 – 2026

Led a non-destructive testing and industrial inspection firm serving power generation and petrochemical facilities. Responsible for strategic planning, capital allocation, regulatory compliance, operational leadership, and risk oversight in asset-intensive, safety-sensitive environments. This operating experience informs his perspective on infrastructure investment and operations.

PRINCIPAL CONSULTANT | BLACK & VEATCH MANAGEMENT CONSULTING | 2015 – 2020

Led regulatory and financial advisory engagements for electric and gas utilities, including revenue requirements, class cost of service, affiliate transactions, and return on equity matters. Filed expert testimony and supported infrastructure transaction advisory and regulatory approval strategy.

SENIOR PROJECT MANAGER & PRINCIPAL | CONCENTRIC ENERGY ADVISORS | 2006 – 2015

Managed regulatory consulting engagements involving revenue requirements, cost allocation, and rate design across multiple jurisdictions. Led project teams, supported expert testimony, and contributed to business development and firm-wide analytical quality control initiatives.

EDUCATION

MASTER OF ARTS, ECONOMICS| AMERICAN UNIVERSITY | 2004 – 2006

Graduate coursework included econometrics, advanced microeconomics and macroeconomics, mathematical economics, monetary policy, and history of economic thought. Served as a teaching assistant for undergraduate microeconomics and macroeconomics courses.

BACHELOR OF ARTS, ENVIRONMENTAL ECONOMICS | UNIVERSITY OF NORTH CAROLINA AT ASHEVILLE | 2000 – 2004

Coursework emphasized the application of economic theory and quantitative analysis to environmental and resource issues, including statistics and applied modeling. Completed independent study examining the intersection of ethics and economic theory.

BOARD AND ADVISORY BOARDS

Treasurer, Board of Directors – The Outside Foundation (2023–Present)

Member – 278 Gateway Corridor Committee, Town of Hilton Head Island (2019–2022)

Richmond Advisory Board – Higher Achievement (2014–2015)

SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
United States				
California - Marin County Superior Court				
Walker (Plaintiff)	2021	Walker v. Marin Municipal Water District	Case No. CIV1501914	Expert report relating to the calculation of bill overcharges used for determining damages.
Delaware Public Service Commission				
Chesapeake Utilities	2015	Chesapeake Utilities Delaware Division	Docket No. 15-1734	Allocated class cost of service study.
Federal Energy Regulatory Commission				
The Central Nebraska Public Power and Irrigation District ("Central")	2017	Southwest Pool Power, Inc. ("SPP") submitted, on Central's behalf.	Docket No. ER17-1741-000	Return on Equity Testimony for Central's Annual Transmission Revenue Requirement
Florida Public Service Commission				
Florida City Gas	2026	Florida City Gas	Docket No. 20260026-GU:	Rate amalgamation allocated cost of service, sales forecast, and rate design.
TECO Energy, Inc.	2025	Peoples Gas System, Inc.	Docket No. 20250029-GU	Allocated cost of service and rate design.
Florida Public Utilities Company	2024	Florida Public Utilities Company - Electric	Docket No. 20240099-EI	Allocated cost of service, sales forecast, and rate design.
Florida Public Utilities Company	2022	Florida Public Utilities Company - Gas	Docket No. 20220067-GU	Rate amalgamation allocated cost of service, sales forecast, and rate design.
Illinois Commerce Commission				
Ameren Utilities Inc.	2008	Central Illinois Light Company d/b/a AmerenCILCO Central Illinois Public Service Company d/b/a AmerenCIPS Illinois Power Company d/b/a AmerenIP	Docket Nos. 07-0585 / 07-0586 / 07-0587 / 07-0588 / 07-0589 / 07-0590 (cons.)	Statistical audit sampling of plant additions documentation in support of the reasonableness of total plant additions added to rate base.

SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Indiana Utility Regulatory Commission				
Northern Indiana Public Service Company LLC & NIPSCO Generation LLC	2026	Northern Indiana Public Service Company LLC & NIPSCO Generation LLC	Cause No. 46120	Large Load (data center) filing and shared system credit allocation.
Northern Indiana Public Service Company, division of Northern Indiana Energy, subsidiary of NiSource, Inc.	2024	Northern Indiana Public Service Company - Electric	Cause No. 46120	Allocated class cost of service and rate design including multifamily rate and low-income usage analysis.
Southern Indiana Gas and Electric Company dba CenterPoint Energy Indiana South (CEI South)	2023	CenterPoint Energy Indiana South (CEI South) - Electric	Cause No. 45990	Allocated class cost of service and rate design.
Northern Indiana Public Service Company, division of Northern Indiana Energy, subsidiary of NiSource, Inc.	2023	Northern Indiana Public Service Company - Gas	Cause No. 45967	Allocated class cost of service, and rate design, and weather normalization adjustment.
Northern Indiana Public Service Company, division of Northern Indiana Energy, subsidiary of NiSource, Inc.	2022	Northern Indiana Public Service Company - Electric	Cause No. 45772	Allocated class cost of service and rate design.
Indianapolis Power and Light, subsidiary of AEP	2015	Indianapolis Power and Light	Cause No. 44576	Allocated class cost of service study.
Northern Indiana Public Service Company, division of Northern Indiana Energy, subsidiary of NiSource, Inc.	2010-11	Northern Indiana Public Service Company	Cause No. 43969	Allocated class cost of service studies.
Maine Public Utilities Commission				
Central Maine Power Company, subsidiary of Iberdrola USA.	2014	Central Maine Power Company	Docket No. 2013-00168	Embedded cost of service study.
Maryland Public Service Commission				
Chesapeake Utilities Corporation	2024	Chesapeake Utilities Corporation, Sandpiper Energy Inc, and Elkton Gas Company	Case No. 9722	Embedded cost of service studies and lead-lag studies.
Massachusetts Department of Public Utilities				

Fitchburg Gas and Electric Light Company d/b/a Unitil Electric Division	2023	Unitil Electric Division	Docket No. DE 23-117	Wholesale distribution access tariff for energy storage systems.
Fitchburg Gas and Electric Light Company d/b/a Unitil Electric Division	2023	Unitil Electric Division	Docket No. DE 23-80	Embedded cost of service study and rate design.
Fitchburg Gas and Electric Light Company d/b/a Unitil Electric Division	2021-2022	Unitil Electric Division	Docket No. DE 20-170	Electric vehicle alternative rate design (demand discount) and residential time-of-use rates.
Fitchburg Gas and Electric Light Company d/b/a Unitil Electric Division	2019	Unitil Electric Division	Docket No. D.P.U. 19-130	Embedded cost of service study and rate design.
Minnesota Public Utilities Commission				
Interstate Power and Light Company, subsidiary of Alliant Energy Corporation	2010-11	Interstate Power and Light Company	Docket No. E001/GR-10-276 OAH Docket No. 4-2500-21392-2	Allocated class cost of service studies and low-income analysis.
New Hampshire Public Utilities Commission				
Unitil Energy Systems – Electric Division	2021-2022	Unitil Energy Systems	Docket No. DE 21-030	Allocated class cost of service study and rate design. Time-of-use rates for residential and commercial customers.
Northern Utilities, Inc.	2021-2022	Northern Utilities, Inc.	Docket No. DG 21-104	Allocated class cost of service study, marginal cost of service study, and rate design.
North Carolina – Brunswick County Superior Court				
Bald Head Island Ferry Transportation	2024	Bald Head Island Transportation, Inc., and Bald Head Island Ferry Transportation, LLC	Case No. 23CVS98	Right of First Refusal and Transfer of Common Carrier Certificate
North Carolina Utilities Commission				
Bald Head Island Ferry Transportation	2022-2023	Bald Head Island Transportation, Inc., and Bald Head Island Ferry Transportation, LLC	Docket No. A-41, SUB 22	Transfer Common Carrier Certificate to operate the passenger ferry transportation services to and from Bald Head Island and the tram services on the island.

Public Service Company of North Carolina	2020-2021	Public Service Company of North Carolina dba Dominion Energy North Carolina	Docket No. G-5, Sub 623	Allocated class cost of service study and rate design.
Ohio - Public Utilities Commission of Ohio				
Suburban Natural Gas Company	2025	Suburban Natural Gas Company	Case No. 25-0553-GA-AIR	Allocated class cost of service study and rate design.
Enbridge Gas Ohio	2025	Enbridge Gas Ohio	Case No. 25-1097-GA-AIR	Allocated class cost of service study and rate design.
Vectren Energy Delivery of Ohio, LLC, D/B/A CenterPoint Energy Ohio	2024	CenterPoint Energy Ohio	Case No. 24-0832-GA-AIR	Allocated class cost of service study, rate design, and rider recovery.
Dominion Ohio Gas/Enbridge Gas Ohio	2023-24	Dominion Ohio Gas/Enbridge Gas Ohio	Case No. 23-0894-GA-AIR	Allocated class cost of service study, rate design, and rider recovery.
Oregon - Public Utility Commission of Oregon				
Northwest Natural Gas Company	2021-22	Northwest Natural Gas Company	UG 435 / UG 411	Line extension policy review.
Pennsylvania Public Utility Commission				
National Fuel Gas Distribution Corporation	2026	National Fuel Gas Distribution Corporation	Docket No. R-2025-3059428	Allocated class cost of service study and WNA.
UGI Utilities – Gas Division	2026	UGI Utilities – Gas Division	Docket No. R-2025-3059523	Allocated class cost of service study, rate design, and WNA.
PECO Energy Company – Gas Division	2026	PECO Energy Company – Gas Division	Docket No. R-2026-3060860	Weather Normalization Adjustment
NiSource - Columbia Gas of Pennsylvania	2025	Columbia Gas of Pennsylvania	Docket No. R-2025-3053499	Rate Design, WNA, and RNA.
UGI Utilities – Gas Division	2025	UGI Utilities – Gas Division	Docket No. R-2024-3052716	Allocated class cost of service study, rate design, and WNA.
UGI Utilities – Electric Division	2022	UGI Utilities – Electric Division	Docket No. R-2022-3037368	Allocated class cost of service study and rate design.
National Fuel Gas Distribution Corporation	2022	National Fuel Gas Distribution Corporation	Docket No. R-2022-3035730	Allocated class cost of service study, rate design, and weather normalization adjustment mechanism

UGI Utilities – Gas Division	2020-2021	UGI Utilities – Gas Division	Docket No. R-2021-3030218	Weather Normalization Adjustment
UGI Utilities – Electric Division	2020-2021	UGI Utilities – Electric Division	Docket No. R-2021-3023618	Allocated class cost of service study, rate design, EV and energy storage program.
UGI Utilities – Electric Division	2017-18	UGI Utilities – Electric Division	Docket No. R-2017-2640058	Allocated class cost of service study and rate design.
PPL Electric Utilities	2015	PPL Electric Utilities Corporation	Docket No. R-2015-2469275	Jurisdictional allocation study, allocated class cost of service study, and rate design.
South Carolina Public Service Commission				
Piedmont Natural Gas Company, Inc.	2026	Piedmont Natural Gas Company, Inc.	Docket No. 2026-61-G	Allocated class cost of service study and lead-lag study.
Dominion Energy South Carolina	2025	Dominion Energy South Carolina – Electric Division	Docket No. 2025-325-E	Allocated class cost of service study, revenue apportionment, lead-lag study.
Dominion Energy South Carolina	2024	Dominion Energy South Carolina – Electric Division	Docket No. 2024-34-E	Allocated class cost of service study and revenue apportionment.
Dominion Energy South Carolina	2023	Dominion Energy South Carolina – Gas Division	Docket No. 2023-70-G	Allocated class cost of service study and rate design.
Tennessee Public Utility Commission				
Spire Tennessee Inc.	2026	Spire Tennessee Inc.	Docket No. 26-00042	Annual ARM Filing - Allocated class cost of service study and revenue apportionment
Virginia State Corporation Commission				
NiSource - Columbia Gas of Virginia	2026	Columbia Gas of Virginia, Inc.	Case No. PUR-2026-00014	Allocated class cost of service study and rate design.
NiSource - Columbia Gas of Virginia	2024	Columbia Gas of Virginia, Inc.	Case No. PUR-2024-00030	Allocated class cost of service study and rate design.
NiSource - Columbia Gas of Virginia	2022	Columbia Gas of Virginia, Inc.	Case No. PUR-2022-00036	Allocated class cost of service study and rate design.
West Virginia – Public Service Commission of West Virginia				

Mountaineer Gas Company	2026	Mountaineer Gas Company	Case No. 26-0079-G-42T	Allocated class cost of service study and rate design.
Hope Gas, Inc.	2025	Hope Gas, Inc.	Case No. 25-0417-G-42T	Allocated class cost of service study and rate design and weather normalization adjustment.
Mountaineer Gas Company	2023	Mountaineer Gas Company	Case No. 23-0280-G-42T	Allocated class cost of service study and rate design and weather normalization adjustment.
Hope Gas, Inc.	2019-2020	Hope Gas Inc. dba Dominion Energy WV	Case No. 20-0746-G-42T	Allocated class cost of service study, rate design, and gathering system cost recovery.
Washington Utilities and Transportation Commission				
Puget Sound Energy – Gas Division	2026	Puget Sound Energy	Docket UG-260006	Billing determinants, normalized revenue, allocated class cost of service study, revenue apportionment, rate design, and Gas Decarbonization Depreciation Study – Customer Impact Analysis.
Puget Sound Energy – Gas Division	2024	Puget Sound Energy	Docket UG-240005	Allocated class cost of service study, revenue apportionment, and rate design.
Puget Sound Energy – Gas Division	2023	Puget Sound Energy	Docket UG-210918	Development and rate calculations associated with the Tacoma LNG Tracker.
Puget Sound Energy – Gas Division	2022	Puget Sound Energy	Dockets UE-220066, UG-220067 & UG-210918	Allocated class cost of service study, revenue apportionment, and rate design.
Puget Sound Energy – Gas Division	2019	Puget Sound Energy	Dockets UE-190529 & UG-190530	Allocated class cost of service study, revenue apportionment, and rate design.
Canada				
Alberta Utilities Commission				

EPCOR Distribution & Transmission Inc.	2019-20	EPCOR Distribution & Transmission Inc.	2020-2022 TFO Tariff Application	Review of the method utilized to allocate costs within the affiliate overhead pool to the distribution and transmission functions of their business.
British Columbia Utilities Commission				
FortisBC Energy, Inc.	2016-18	FortisBC Energy, Inc.	Project No.3698899	Report relating to review of 'Transportation Service Model' - midstream transportation and storage capacity resources used in providing balancing of transportation customers' loads.
Ontario Energy Board				
Alectra Utilities Corporation	2025	Alectra Utilities Corporation	EB-2025-0252	Report relating to updating and evaluating Alectra's affiliate cost allocation methods to ensure that the cost allocation methods distribute costs in a manner that is consistent with regulatory practice and precedent, including Overhead Capitalization and Shared Assets
Milton Hydro Distribution Inc.	2025	Milton Hydro Distribution Inc.	EB-2025-0241	Independent review of Milton Hydro's affiliate cost allocation methodology for common corporate costs and shared assets under the Ontario Energy Board Affiliate Relationships Code.
Alectra Utilities Corporation	2018	Alectra Utilities Corporation	EB-2018-0016	Report relating to updating and evaluating Alectra's affiliate cost allocation methods to ensure that the cost allocation methods distribute costs in a manner that is

				consistent with regulatory practice and precedent.
Hydro One Networks Inc.	2017	Hydro One Transmission Hydro One Distribution	EB-2016-0160 (Transmission) & EB-2017-0049 (Distribution)	Three reports relating to shared service and overhead cost allocation across Hydro One's business units (1) Review of Allocation of Common Corporate Costs (2) Review of Shared Assets Allocation (3) Review of Overhead Capitalization Rates.

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 6-R

REBUTTAL TESTIMONY OF BETHANY L. JOHNSON

TOPICS ADDRESSED: FERC TRANSMISSION RATES

DATE: AUGUST 7, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Bethany L. Johnson, and my business address is 827 Hausman Road, Allentown, Pennsylvania, 18104.

Q. By whom are you employed and in what capacity?

A. I am employed by PPL Services Corporation ("PPL Services"), an affiliate of PPL Electric Utilities Corporation ("PPL Electric" or the "Company") which provides services to PPL Electric, as the Senior Director of Regulatory.

Q. What are your responsibilities as Senior Director of Regulatory?

A. I am responsible for PPL Electric's development of revenue forecasting and analysis, distribution rate design and administration, cost of service implementation, as well as transmission Federal Energy Regulatory Commission ("FERC") Formula Rates, development of rate case strategies and processes, and compliance with the regulatory requirements of the Pennsylvania Public Utility Commission ("Commission"), the FERC and other regulatory agencies, as necessary. Additionally, I oversee energy and utility policy and regulatory strategy for PPL Electric. As part of this function, I am responsible for the preparation, review, and technical oversight and guidance of the development, content, and structure of cost allocation and revenue requirement studies. In addition, I am responsible for all aspects of Rhode Island Energy's and PPL Electric's procurement of wholesale generation supply and scheduling and settlement activities with PJM Interconnection, LLC ("PJM") and ISO New England, Inc. I also prepare and present expert testimony regarding these and other cost-of-service and ratemaking-related issues.

Q. What is your educational background?

A. I graduated from King's College in 1999 with a Bachelor of Science Degree in Finance, and from Moravian College in 2003 with a Master of Business Administration.

Q. Please describe your professional experience.

A. In 2000, I was employed by PPL Global Operations, Inc. ("PPL Global Operations"), where I supported the accounting and financial reporting activities for PPL Global Operations' domestic operations. In 2001, as a result of corporate realignment, I joined PPL Generation, LLC. In this position, my responsibilities included cost control, budgeting, reporting, and management of the forecasting process for large construction projects, as well as the administration of construction and financing contracts. In 2004, I rejoined PPL Global Operations as a Senior Business Analyst with responsibility for maintaining, analyzing, consolidating, and presenting business plans and operational performance results for PPL Global Operations' international affiliates. In 2007, I joined PPL Energy Services Group, LLC as a Business Analyst providing financial modeling and analytical support for evaluations of acquisition, development, and divestiture opportunities. In 2009, I joined PPL Electric as a Project Controls Specialist providing advanced cost analysis for distribution and transmission projects. Later in 2009, I became the Financial Business Planning Specialist in the Regulatory Compliance Department. In August 2012, I was named Manager - Regulatory Compliance for PPL Electric, and in October 2015, I was named Manager - Regulatory Operations, which included overseeing scheduling and settlement functions with PJM. During my time in this role, I also took

responsibility for load and revenue forecasting and reporting as well as energy and utility policy, and company strategy. In September 2020, I was named Director - Regulatory Affairs. In December 2021, my role was transferred to PPL Services Corporation. In June 2023, I was promoted to Senior Director -– Regulatory for PPL Services Corporation.

Q. Have you previously testified as a witness in other Commission proceedings or any other jurisdiction's proceedings?

A. Yes, I have testified before this Commission in several proceedings. A list of the matters in which I have testified is attached as Appendix A.

Q. What is the purpose of your rebuttal testimony?

A. My testimony responds to certain claims raised by OCA witnesses Felder and Konidena related to the recovery of costs, through transmission base rates, for the Letter of Notification filed by PPL Electric Utilities Corporation 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 ("Tomhicken 230 kV Switchyard Project" or the "Project"). In particular, I will address the important distinction between transmission rates regulated by the FERC and distribution rates regulated by the Commission

Q. Are you sponsoring any exhibits associated with your rebuttal testimony?

A. Yes. Attached to my rebuttal testimony are PPL Electric Exhibit BLJ-1R, the Transmission Service Charge ("TSC") Rate Filing, PPL Electric Exhibit BLJ-2R, the Company's new

LP-6 rate schedule, the section of PPL Electric's Commission-approved tariff covering large load customers like the data center customer ("Customer") requesting service in this proceeding, and PPL Electric Exhibit BLJ-3R, a model showing the estimated transmission service charge impact of incremental Project costs and Customer load.

I. FERC-REGULATED TRANSMISSION RATES VERSUS COMMISSION-REGULATED DISTRIBUTION RATES

Q. OCA witnesses Felder and Konidena devote a considerable amount of their direct testimony to the transmission cost allocation for the Project and its impact on other ratepayers. (*See, e.g.*, OCA St. No. 1, pp. 13-15, 18-31;) Can you please explain the distinction between the Company's distribution base rates, which are regulated by the Commission, and the Company's transmission rates that are regulated by FERC, and why this distinction is important?

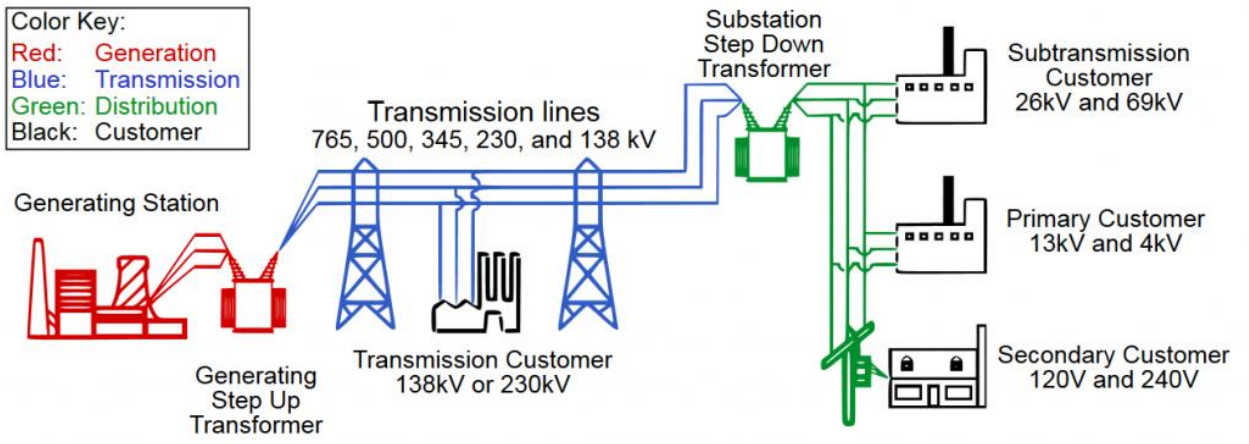
A. Yes. As a preliminary matter, I note that PPL Electric witness Mr. Taylor provides specifics regarding the policies applicable to the Company's transmission costs, the allocation of those costs, and its transmission rates in his rebuttal testimony (PPL Electric Statement No. 5-R). My rebuttal testimony on this issue is intended to address the how PPL Electric's rates operate within this policy framework, which bolsters Mr. Taylor's conclusions that the purported "policy gap" identified by OCA's witnesses does not exist even in the specific context of this case. Since Pennsylvania restructured in the late 1990s, PPL Electric has been a "wires" business, meaning that it is responsible for the delivery of electricity from power plants to end use customers. This includes both transmission and distribution. While PPL Electric owns both, they are regulated differently by two distinct organizations. As it pertains to ratemaking, transmission ratemaking is regulated by FERC

and PJM acts as the regional transmission organization or "RTO," and distribution ratemaking is regulated by the Commission.

Table 1 below is intended to illustrate the distinction between the three major components of utility service – generation, transmission, and distribution. It should be noted that PPL Electric does not own generation and is not permitted to recover the costs of owning or operating generation. The Company recovers only generation-related costs (with no markup) it incurs fulfilling its obligation as the Provider of Last Resort ("POLR") under state law.

Referring to the illustration, PPL Electric owns and maintains a transmission network and a distribution network. I will note that 69 kV is *subtransmission,* with cost recovery handled consistently with other transmission costs. The costs for the Project at issue in this proceeding pertains only to the transmission network.

Table 1



Q. Please describe the various roles PPL Electric services as it pertains to ratemaking for transmission and distribution.

A. PPL Electric acts in several roles important to this discussion: (1) as a Transmission Owner ("TO"); (2) as a Load Serving Entity ("LSE"); and (3) as an Electric Distribution Company ("EDC").

First, as a TO, the Company owns the transmission system within its service territory and has a contractual agreement with PJM known as the Transmission Owners Agreement. This agreement includes, among other things, the right for the TO to file its revenue requirement and for PJM to collect and distribute revenue on behalf of TOs. Changes to the Transmission Owners Agreement require a vote by the PJM TOs, are filed at FERC, and are subject to the FERC complaint process. The revenue requirement, known as the FERC Transmission Formula Rate, is the first step of a Transmission Owner recovering its transmission system costs and I will explain this later in my testimony.

Second, PPL Electric is an LSE, which is the term used to identify companies that supply energy to end-use customers. PPL Electric, because it is a default service provider, is an LSE, as are the many licensed EGSs in the state. LSEs are the entities charged the FERC Transmission Formula Rate by PJM for use of the Transmission Owners' transmission system.

Lastly, as the EDC, PPL Electric is obligated to provide default service and is able to recover the costs of this role through the Price-To-Compare, which consists of the Generation Service Charge ("GSC") and the Transmission Service Charge ("TSC"), which are pass through costs to end-use customers.

Q. Could you please explain how the Company's transmission rates operate, particularly what costs they are designed to recover?

A. Again, referring to Table 1 above, transmission rates are designed to recover the return of and the return on transmission plant and recovery of operation & maintenance expenses (the same foundational revenue requirement formula used in distribution ratemaking). This is the section identified in blue in Table 1. These assets are designed to accommodate higher voltages (as noted in Table 1) and run longer distances. The transmission system is often equated to an interstate highway or turnpike system while the distribution system is thought of as the local roads to customers' homes. Thus, because the transmission system is designed to carry energy from the generation source over the long distances (interstate highway) to the distribution system (local roads) that ultimately delivers to a customer's home or business, new transmission lines and equipment, upgrades, and maintenance typically benefit all end users. In certain instances, very large customers, such as the customer requesting service in this proceeding, are interconnecting at the sub-transmission level and do not use the distribution network. These customers may have specific needs for transmission level equipment to be served. Customers who need such equipment pay for the upgrades required due to their interconnection that serve only them through a Contribution in Aid of Construction ("CIAC"). Other upgrades to the transmission system, or interstate highway, are still benefitting all other customers.

Q. How does the Company recover the costs of the transmission system?

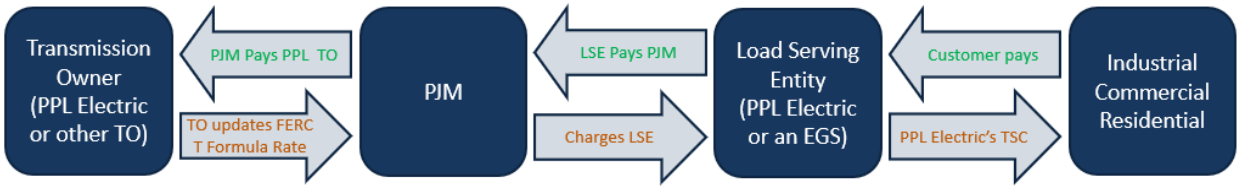
A. The Company recovers its costs associated with its role as a TO through its FERC Transmission Formula Rate filed with FERC and billed by PJM. PPL Electric Witness Taylor provides an explanation of how the Transmission Formula Rate is calculated on pages 13 to 14 of PPL Electric St. No. 5-R. The Company's FERC Transmission Formula

Rate is publicly available at PJM's website at www.pjm.com/markets-and-operations/billing-settlements-and-credit/formula-rates.

Q. Is PPL Electric's FERC Transmission Formula Rate different from its Transmission Service Charge?

A. Yes. The FERC Transmission Formula Rate is the ratemaking tool by which PPL Electric as a Transmission Owner recovers the costs of its transmission system. It is regulated by FERC and billing is administered by PJM. In contrast, the Transmission Service Charge is the method by which PPL Electric, as the LSE and an EDC, recovers the costs of its PJM bill for transmission service provided to default services customers. The Transmission Service Charge is regulated by the PUC. The rate and billing relationships are shown visually in Table 2.

Table 2

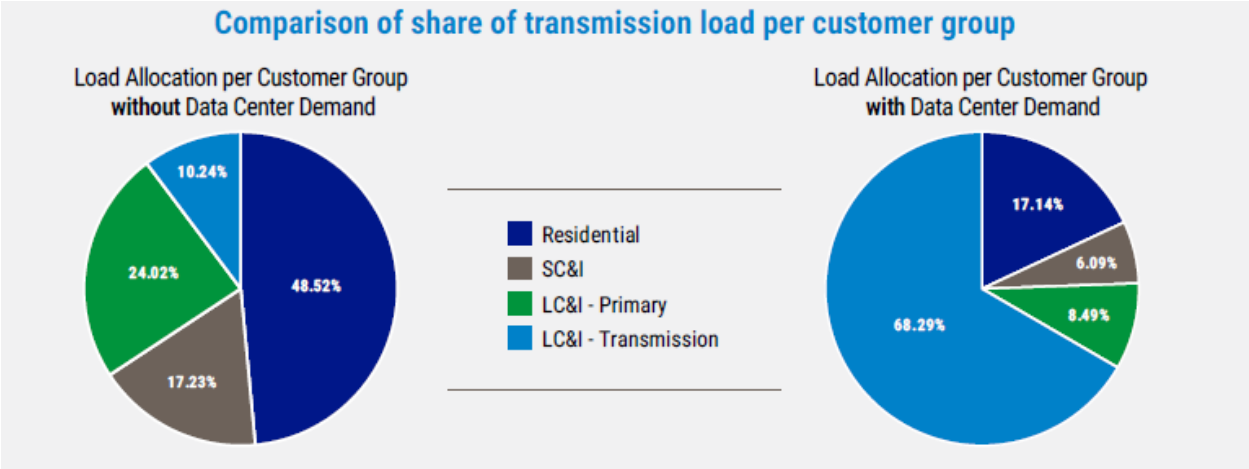


Q. Can you explain how the Company's Transmission Service Charge operates?

A. The Transmission Service Charge, also explained in the Company's Tariff, is a Section 1307(e) Automatic Adjustment Clause and is the mechanism by which PPL Electric recovers the costs of transmission service it incurs to provide default service to customers. This is distinct from recovering the costs of the transmission system as a Transmission Owner. As a default service provider, PPL Electric procures generation and transmission

service for customers who choose not to shop. In this role, PPL Electric is similar to an EGS (also an LSE) in that it must pay PJM, the TO billing agent, for the use of the transmission system (transmittal of energy, capacity, ancillary services, etc.) used to service its default service customers. Those costs are billed to default service customers through the Company's TSC. PPL Electric allocates its total PJM costs incurred as the LSE, which are shown in Schedule B lines 27 through 42 of the Company's TSC Rate Filing attached as PPL Electric Exhibit BLJ-1R, to its default service rate classes based on each class's share of energy and demand components. These costs, including adjustments for net metering, Merchant Function Charge ("MFC" or uncollectibles), and any over/under collection amounts, are the components of the TSC rate charged to the Company's default service customers as one of the PTC components. Both the costs billed to PPL Electric by PJM and the allocation of those costs to the respective customer classes fluctuate as customers choose to shop or return to default service. One could think about this like a pie. The total cost from PJM is 100% of the pie and the respective customer classes pay costs based on what portion of the pie their load represents.

Please note that the table below is as of July 1, 2025 and assumes 13GW of Large Load additions to the Company's then current peak load of 7.5GW.



Q. What costs associated with large load interconnections, such as data centers, are recovered through the Company's base distribution rates?

A. Nearly none. I say nearly because the Company does consider the meter and certain customer-service related costs as distribution costs. However, these customers interconnect at 69 kV, noted as subtransmission in Table 1, or higher. Therefore, delivering electricity to these customers does not require the poles and wires that make up the Company's distribution system, and the only reasonable distribution costs that form the basis for the customer charge for the Company's LP-5 and LP-6 customers is the metering and certain customer-service related costs. This customer charge is approximately $1,000/month, underscoring their lack of use of the distribution system. For context, an industrial customer using 1,000kW and 650,000kWh has an average total bill of over $50,000/month.

Q. OCA witness Felder raised concerns related to the affordability of PPL Electric's electric service due to the impact of data centers on the Company's rates. (*See* OCA St. No. 1, pp. 7-25.) Could you please respond?

A. The Company shares concerns about customer affordability and believes additional context is required to fully understand the impact of data centers on residential rates. Let us evaluate each component of a customer's bill.

First, to be abundantly clear, data centers have little to no impact on the Company's distribution system or distribution rates, for all the reasons I explain above. They simply do not use the distribution system. And if they did, the associated costs would be applied

to the respective rate class through the Company's cost of service – just as they have been for the Company's other Large C&I (LP-4 and LP-5) customers for decades and are for the metering and certain customer service-related costs.

Second, data centers do impact the transmission system and transmission rates. Because these large customers are interconnecting at least 69 kV, upgrades to the transmission system may be required for either equipment to serve the customer specifically or also upgrades to other parts of the transmission system that provide benefits to all customers. On its face, this may sound like this increases costs to all customers-- but remember the FERC Transmission Formula Rate. The FERC Transmission Formula Rate Network Service Charge is calculated by taking the Net Revenue Requirement divided by the single coincident peak. These large load customers are anticipated to run 24x7 and therefore would impact that peak. PPL Electric's analysis, as shown in PPL Electric Exhibit BLJ-3R, has shown that approximately $38.4 million of transmission capital investment (assumed to be recovered over 42 years) for a 12-MW data center, results in approximately $4.6 million incremental annual revenue requirement. PPL Electric's Network Service Rate at the time of the analysis had a starting point of $889,895,496 revenue requirement divided by a single coincident peak of 8,057.0 MW equaling a rate of $110,450/MW-Yr. If you add the $4,644,187 million/year incremental revenue requirement, you now have $894,539,683 divided by 8,069.0 MW, which equals a rate $110,861/MW-Yr. While the revenue requirement itself increases, the increase in the peak load offsets that, and when adjusted for timing and cost allocation to PPL Electric's customer groups, versus the transmission service charge effective as of January 1, 2026, residential customers may see a decrease in their bill of approximately $5/year. . Often with this type of large load project,

the increase in the denominator (load) of the calculation is so much greater than the increase in the numerator (revenue requirement) that the result (rate) decreases. Thought of with more simple math: 1/10 = 0.1 versus 10/1,000 = 0.0001. Again, while the numerator increases (from 1 to 10), the denominator increase is greater (from 10 to 1,000) resulting in a lower rate (0.1 versus 0.0001). The magnitude of the load offsetting the revenue requirement is different for each project based on its unique characteristics. This is why data centers are expected to reduce the FERC Transmission Formula Rate. Taken a step further, recall that the FERC Transmission Formula Rate is charged to LSEs. PJM will charge this lower rate to LSEs for their respective load. PPL Electric, as an LSE for default service customers, will be charged this lower rate for its same amount of default service load (assuming the data center shops). Therefore, the total costs it passes through the Transmission Service Charge to its default service customers will be less.[1]

The last component of the bill to mention is generation. PPL Electric acknowledges that increases to load will create demand for more generation. This supply and demand is arbitraged though the PJM markets. Basic economics stated simply indicate that when demand increases for the same supply, a shortage may be created. This typically results in a price increase, then more supply is produced to capitalize on the higher price. The new higher supply aligns closer with demand, reducing the shortage and reducing prices. Recalling that Pennsylvania was restructured over three decades ago, PPL Electric does not own or operate generation and does not control the market of supply and demand for generation capacity. For Pennsylvania, this market is managed by PJM. So, in the current

[1] If a data center were to choose default service, PPL Electric (as LSE) would still be charged the lower rate applied to its then higher load. The Transmission Service charge allocated energy and demand to customer classes based on their respective load, so non-large load customers would still benefit from lower costs.

legislative and regulatory environment, while PPL Electric is aware of this challenge, it is limited in its ability to influence either the supply or demand – it cannot recover as part of its rate base the costs to build, own, operate generation as a regulated utility (to increase supply), and the Company must extend service to customers in its service territory, subject to the line extension provisions of its tariff, due to its obligations as a regulated monopoly operating in a certificated service territory (reduce load). That being said, in terms of a customer's total bill amount, the significant decreases in transmission costs should at least partially offset increases in generation costs and when the PJM generation capacity markets functions as it should, whether through recent PJM reforms or alternatives to that market that allow for additional generation resources, upward pressure on generation costs should subside while the reductions to transmission costs will remain for the life of the load.

In summary, the Company is concerned about affordability for its customers and, while limited in what it has control over, the Company takes action to support its customers. Decades of Pennsylvania energy policy have segmented electricity service for the Commonwealth's customers and at least since Bonbright's Principles were published in the 1960s, the utility industry has allocated its costs in accordance with these principles. For this reason, PPL Electric's distribution costs remain unaffected by data centers, the transmission costs will be reduced by data centers, and generation costs, which are driven by the PJM market (for Pennsylvania), will fluctuate.

II. CONCLUSION

Q. Does this conclude your Rebuttal Testimony at this time?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

PPL ELECTRIC UTILITIES CORPORATION
COMPUTATION OF PROPOSED TRANSMISSION SERVICE CHARGE
COMPUTATION PERIOD: DECEMBER 1, 2025 THROUGH NOVEMBER 30, 2026

Line No.			Total	Residential	Small Commercial & Industrial	Large Commercial & Industrial - Primary	Large Commercial & Industrial - Transmission
1	Transmission Service Charge			(A)	(A)	(B)	(B)
2	TCd = Total Demand-related Portion of Projected PJM-Billed Transmission Service Expenses (Schedule B)		$ 292,578,811	$ 235,994,069	$ 52,664,186	$ 3,276,883	$ 643,673
3	TCe = Total Energy-related Portion of Projected PJM-Billed Transmission Service Expenses (Schedule B)		1,430,548	1,430,548	-	-	-
3A	Total Directly Assignable PJM Expenses - Residential only (Schedule B-1)		13,257,981	13,257,981	-	-	-
3B	Net Metering Expenses (Schedule B)		2,514,198	-	589,504	1,924,694	-
4	E = Experienced Net Over/(Under) Collections, Including Interest and Audit Adjustment (C),		(7,628,375)	(1,580,284)	(2,577,943)	(2,954,739)	(515,409)
	Net Prior Period Remaining Balance		-		-	-	-
5	Net Over(Under) Collection Amount		(7,628,375)	(1,580,284)	(2,577,943)	(2,954,739)	(515,409)
6	Total Amount to be Recovered (Line 2 plus Line 3 plus Line 3A plus Line 3B less Line 5		$ 317,409,913	$ 252,262,882	$ 55,831,633	$ 8,156,316	$ 1,159,082
7	Total Amount to be Recovered, Including MFC (Line 6 times MFC)		$ 323,503,613	$ 258,227,890	$ 55,960,325	$ 8,156,316	$ 1,159,082
8	S = Projected Total Retail KWH Sales to Customers		10,224,991,983	8,208,248,491	1,801,061,542	132,268,873	83,413,077
9	Billing Demand kW					400,418	
10	Peak Load Contribution (MW)						66.0 (E)
11	Merchant Function Charge Factor (MFC)						
	Residential	1/(1 - .0231) =		1.023646			
	Small Commercial & Industrial	1/(1 - .0023) =			1.002305		
12	$\frac{1}{(1 - T)}$ = (T = 5.9% Gross Receipts Tax)	x	1.062699				
13	TSC = Transmission Service Charge ($/ KWH)						
	Energy Rate ($/KWH) (w/o GRT)			$ 0.03146	$ 0.03107	$ -	$ -
	Demand Rate ($/kW) (w/o GRT)					$ 20.370	$ 17.562
	Energy Rate ($/KWH) (w/ GRT)			$ 0.03343	$ 0.03302	$ -	$ -
	Demand Rate ($/kW) (w/ GRT)					$ 21.647	$ 18.663

(A) TSC=[TCe/S + TCd/S - E/S] x 1/(1-T)

(B) TSC=TSCd + TSCe
TSCd=[TCd/D] x 1/(1-T)
TSCe=[TCe/S-E/S] x 1/(1-T)

(C) Schedule 1 of the Transmission Service Charge Reconciliation Report

(D) In accordance with the Commission's approval of PPL Electric's Default Service Program and Procurement Plan for the Period June 1, 2025 through May 31, 2029 at Docket No. P-2024-3047290, PPL Electric is filing a new TSC to be effective for the 12-month period of December 1, 2025 through November 30, 2026.

Schedule A

PPL ELECTRIC UTILITIES CORPORATION
Projected December 2025 to November 2026 PJM-Billed Transmission Service Expenses by Month and Net Metering Expenses

Line No.	Description	December 2025	January 2026	February 2026	March 2026	April 2026	May 2026	June 2026	July 2026	August 2026	September 2026	October 2026	November 2026	Total
	Demand Components													
1	Network Transmission Service Charge	$24,005,089	$24,005,089	$21,682,016	$24,005,089	$23,230,732	$24,005,089	$23,230,732	$24,005,089	$24,005,089	$23,230,732	$24,005,089	$23,230,732	$282,640,567
2	Network Transmission Service Charge - Call Option	-	-	-	-	-	-	-	-	-	-	-	-	$0
3	Seams Elimination Cost Assignment - SECA Charge/SECA Call Option	-	-	-	-	-	-	-	-	-	-	-	-	$0
4	Reactive Supply and Voltage Control from Generation Sources Service	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
5	Black Start Service	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
6	Transmission Losses (Point-to-Point) Credits	$ -	$ -	$ -	$ -	$ -	$ -							$ -
7	Non-Firm Point-to-Point Transmission Service Credits	$ (40,503)	$ (40,503)	$ (40,503)	$ (40,503)	$ (40,503)	$ (40,503)	$ (40,503)	$ (40,503)	$ (40,503)	$ (40,503)	$ (40,503)	$ (40,503)	$ (486,036)
8	Transmission Enhancement Charges	$867,128	$867,128	$867,128	$867,128	$867,128	$867,128	$867,128	$867,128	$867,128	$867,128	$867,128	$867,128	$10,405,536
9	Reactive Services	-	-	-	-	-	-	-	-	-	-	-	-	$0
10	PJM Schedule 13 Expansion Cost Recovery Mechanism	-	-	-	-	-	-	-	-	-	-	-	-	$0
11	PJM Defaults	-	-	-	-	-	-							$0
12	Deferred Tax	$1,562	$1,562	$1,562	$1,562	$1,562	$1,562	$1,562	$1,562	$1,562	$1,562	$1,562	$1,562	$18,744
13	Total Demand Components	$24,833,276	$24,833,276	$22,510,203	$24,833,276	$24,058,919	$24,833,276	$24,058,919	$24,833,276	$24,833,276	$24,058,919	$24,833,276	$24,058,919	$292,578,811
	Energy Components													
14	Reliability First Corporation Charge (RFC)	$2,423	$2,423	$2,189	$2,423	$2,345	$2,423	$2,345	$2,423	$2,423	$2,345	$2,423	$2,345	$ 28,530
15	PJM System Control and Dispatch Service	$36,103	$36,103	$32,610	$36,103	$34,939	$36,103	$34,939	$36,103	$36,103	$34,939	$36,103	$34,939	425,087
16	Transmission Owner Scheduling, System Control and Dispatch Service	$4,893	$4,893	$4,420	$4,893	$4,735	$4,893	$4,735	$4,893	$4,893	$4,735	$4,893	$4,735	57,611
17	Regulation and Frequency Response Service	$20,658	$20,658	$18,659	$20,658	$19,992	$20,658	$19,992	$20,658	$20,658	$19,992	$20,658	$19,992	243,233
18	Operating Reserve - Supplemental Reserve Service	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Day Ahead	$13,833	$13,833	$12,494	$13,833	$13,386	$13,833	$13,386	$13,833	$13,833	$13,386	$13,833	$13,386	162,869
20	Real Time (Balancing)	$28,952	$28,952	$26,150	$28,952	$28,018	$28,952	$28,018	$28,952	$28,952	$28,018	$28,952	$28,018	340,886
21	Synchronous Condensing Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Operating Reserve - Synchonous Reserve	$11,579	$11,579	$10,459	$11,579	$11,206	$11,579	$11,206	$11,579	$11,579	$11,206	$11,579	$11,206	136,336
23	Non-Synchronized Reserves (OATT Schedule x)	$1,281	$1,281	$1,157	$1,281	$1,240	$1,281	$1,240	$1,281	$1,281	$1,240	$1,281	$1,240	15,084
24	Consumer Advocates of PJM States, Inc.	$53	$53	$48	$53	$52	$53	$52	$53	$53	$52	$53	$52	627
25	North American Electric Reliability Corporation Charge (NERC)	$1,723	$1,723	$1,556	$1,723	$1,667	$1,723	$1,667	$1,723	$1,723	$1,667	$1,723	$1,667	20,285
26	Day Ahead Scheduling Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
	Total Energy Components	$121,498	$121,498	$109,742	$121,498	$117,580	$121,498	$117,580	$121,498	$121,498	$117,580	$121,498	$117,580	$ 1,430,548
	Total Demand and Energy Components	$ 24,954,774	$ 24,954,774	$ 22,619,945	$ 24,954,774	$ 24,176,497	$ 24,954,774	$ 24,176,499	$ 24,954,774	$ 24,954,774	$ 24,176,499	$ 24,954,774	$ 24,176,499	$ 294,009,359

		Total 2025-2026	Factors
	Demand Expense Allocation		
27	Residential	$ 235,994,069	80.66%
28	Small Commercial & Industrial	52,664,186	18.00%
29	Large Commercial & Industrial - Primary	3,276,883	1.12%
30	Large Commercial & Industrial - Transmission	643,673	0.22%
	Total	$ 292,578,811	100.00%
	Energy Expense Allocation		
31	Residential	$ 1,430,548	100.00%
32	Small Commercial & Industrial	-	0.00%
33	Large Commercial & Industrial - Primary	-	0.00%
34	Large Commercial & Industrial - Transmission	-	0.00%
	Total	$ 1,430,548	100.00%
	Total Expense Allocation		
35	Residential	$ 237,424,617	
36	Small Commercial & Industrial	52,664,186	
37	Large Commercial & Industrial - Primary	3,276,883	
38	Large Commercial & Industrial - Transmission	643,673	
	Total	$ 294,009,359	
	Net Metering Expense Allocation		
39	Residential	$ -	
40	Small Commercial & Industrial	589,504	
41	Large Commercial & Industrial - Primary	1,924,694	
42	Large Commercial & Industrial - Transmission	-	
	Total	$ 2,514,198	

Schedule B

PPL ELECTRIC UTILITIES CORPORATION
Projected December 2025 through November 2026 Directly Assignable PJM Expenses by Month

Residential Only

Line No.	Description	December 2025	January 2026	February 2026	March 2026	April 2026	May 2026	June 2026	July 2026	August 2026	September 2026	October 2026	November 2026	Total
1	Directly Assignable PJM Expenses	$ 1,124,425	$ 1,124,425	$ 1,023,659	$ 1,124,425	$ 1,090,836	$ 1,124,425	$ 1,090,837	$ 1,124,425	$ 1,124,425	$ 1,090,837	$ 1,124,425	$ 1,090,837	$ 13,257,981

Schedule B-1

Attachment 1

PPL ELECTRIC UTILITIES CORPORATION
TRANSMISSION SERVICE CHARGE RECONCILIATION
Report For The Period April 1, 2025 to March 31, 2026

Line No.		Total	Residential	Small Commercial & Industrial	Large Commercial & Industrial - Primary	Large Commercial & Industrial - Transmission
1	Actual Transmission Service Charge Revenues available for current expenses (Excluding GRT and MFC) (Schedule 2, Column M, Lines 1, 6, 10 & 14)	$ 136,719,550	$ 110,163,086	$ 23,584,554	$ 1,910,668	$ 1,061,242
2	Actual PJM-Billed Transmission Service Expenses (Schedule 2, Column M, Lines 2, 7, 11 & 15)	139,237,810	112,115,670	24,878,947	1,823,144	420,049
3	Actual PJM Costs Directly Assigned (Schedule 2, Column M, Line 3)	7,063,453	7,063,453	-	-	-
4	Actual Net Metering Expenses (Schedule 2, Column M, Lines 4, 8, 12 & 16)	4,563,945	816,824	1,933,983	1,813,138	-
5	Over/(Under) Collection (Schedule 2, Column M, Lines 5, 9, 13 & 17)	(14,145,658)	(9,832,861)	(3,228,376)	(1,725,614)	641,193
6	Interest on Over/(Under) Collection (Schedule 5, Line 14, Columns D, F, H, J & L)	(968,982)	(686,246)	(215,170)	(100,303)	32,737
7	Over/(Under) Collection plus Interest (Excluding GRT) (Line 5 plus Line 6)	(15,114,640)	(10,519,107)	(3,443,546)	(1,825,917)	673,930
8	Remaining E-Factor Balance (Schedule 3, Line 14, Columns B, D, F, H, and J)	7,486,265	8,938,823	865,603	(1,128,822)	(1,189,339)
9	Over/(Under) Collection (Excluding GRT) (Line 7 plus Line 8)	$ (7,628,375)	$ (1,580,284)	$ (2,577,943)	$ (2,954,739)	$ (515,409)

(1) Represents the under-collection, including applicable interest, at September 30, 2025, as set forth on Schedule A, Line 4A of the Company's October 31, 2025 rate filing.

Schedule 1

PPL ELECTRIC UTILITIES CORPORATION
RECONCILIATION OF TRANSMISSION SERVICE CHARGE ("TSC") REVENUES AND EXPENSES BY MONTH

Line No.	Description	(A) April 2025	(B) May 2025	(C) June 2025	(D) July 2025	(E) August 2025	(F) September 2025	(G) October 2025	(H) November 2025	(I) December 2025	(J) January 2026	(K) February 2026	(L) March 2026	(M) Total Year-to-date
Residential														
1	Transmission Service Charge Revenues Available (excluding GRT and MFC), (Schedule 4, Column E)	$ 15,394,194	$ 12,998,960	$ 17,216,030	$ 23,273,618	$ 22,979,790	$ 18,300,494	$ -	$ -	$ -	$ -	$ -	$ -	$ 110,163,086
2	Actual PJM-Billed Transmission Service Expenses (Schedule 6, Line 50)	18,096,463	18,830,612	18,355,956	19,005,189	19,143,907	18,683,543	-	-	-	-	-	-	112,115,670
3	Actual PJM Costs Directly Assigned (Schedule 6A, Line 32)	1,189,631	1,192,872	1,163,450	1,196,349	1,174,573	1,146,578	-	-	-	-	-	-	7,063,453
4	Net Metering Expenses	93,727	607,291	41,372	21,439	26,284	26,711	-	-	-	-	-	-	816,824
5	Over/(Under) Collection (Line 1 minus Line 2 minus Line 3 minus Line 4)	(3,985,627)	(7,631,815)	(2,344,748)	3,050,641	2,635,026	(1,556,338)	-	-	-	-	-	-	(9,832,860)
Small Commercial & Industrial														
6	Transmission Service Charge Revenues Available (excluding GRT and MFC), (Schedule 4, Column E)	3,163,277	3,203,766	3,557,391	4,772,897	4,716,908	4,170,315	-	-	-	-	-	-	23,584,554
7	Actual PJM-Billed Transmission Service Expenses (Schedule 6, Line 51)	3,971,299	4,171,264	4,050,386	4,230,720	4,285,878	4,169,400	-	-	-	-	-	-	24,878,947
8	Net Metering Expenses	69,031	912,543	501,326	248,061	109,312	93,710	-	-	-	-	-	-	1,933,983
9	Over/(Under) Collection (Line 6 minus Line 7 minus Line 8)	(877,053)	(1,880,041)	(994,321)	294,116	321,718	(92,795)	-	-	-	-	-	-	(3,228,376)
Large Commercial & Industrial - Primary														
10	Transmission Service Charge Revenues Available (excluding GRT and MFC), (Schedule 4, Column E)	203,150	224,746	214,712	433,062	467,384	367,614	-	-	-	-	-	-	1,910,668
11	Actual PJM-Billed Transmission Service Expenses (Schedule 6, Line 52)	314,292	312,807	365,930	297,473	273,213	259,429	-	-	-	-	-	-	1,823,144
12	Net Metering Expenses	156,892	143,555	53,521	848,733	417,161	193,276	-	-	-	-	-	-	1,813,138
13	Over/(Under) Collection (Line 10 minus Line 11 minus Line 12)	(268,034)	(231,616)	(204,739)	(713,144)	(222,990)	(85,091)	-	-	-	-	-	-	(1,725,615)
Large Commercial & Industrial - Transmission														
14	Transmission Service Charge Revenues Available (excluding GRT and MFC), (Schedule 4, Column E)	(542)	154,863	163,233	254,098	292,398	197,192	-	-	-	-	-	-	1,061,242
15	Actual PJM-Billed Transmission Service Expenses (Schedule 6, Line 53)	67,348	73,206	98,344	75,549	54,643	50,959	-	-	-	-	-	-	420,049
16	Net Metering Expenses	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Over/(Under) Collection (Line 14 minus Line 15 minus Line 16)	(67,890)	81,657	64,889	178,549	237,755	146,233	-	-	-	-	-	-	641,193
Total														
18	Over/(Under) Collection (Sum of Lines 5, 9, 13 & 17)	$ (5,198,604)	$ (9,661,815)	$ (3,478,919)	$ 2,810,162	$ 2,971,509	$ (1,587,991)	$ -	$ -	$ -	$ -	$ -	$ -	$ (14,145,658)

Schedule 2

PPL ELECTRIC UTILITIES CORPORATION
EFFECT ON THE OVER/(UNDER) COLLECTION BALANCE
Report For The Period April 1, 2025 to March 31, 2026

		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)
		Total		Residential		Small Comm. & Industrial		Large Comm. & Industrial - Primary		Large Comm. & Industrial - Transmission	
Line No.	Month	(Refund)/Recovery (1)	Over/(Under) Balance (2)	(Refund)/Recovery (1)	Over/(Under) Balance (2)	(Refund)/Recovery (1)	Over/(Under) Balance (2)	(Refund)/Recovery (1)	Over/(Under) Balance (2)	(Refund)/Recovery (1)	Over/(Under) Balance (2)
1	Balance - March 31, 2025 (3)		$ (8,338,091)		$ (1,151,003)		$ (3,508,131)		$ (2,127,273)		$ (1,551,684)
2	April 2025	$ 6,128,182	$ (2,209,909)	$ 5,033,037	$ 3,882,034	$ 885,547	$ (2,622,584)	$ 94,198	$ (2,033,075)	$ 115,400	$ (1,436,284)
3	May 2025	$ 5,393,101	$ 3,183,192	$ 4,251,793	$ 8,133,827	$ 895,099	$ (1,727,485)	$ 86,835	$ (1,946,240)	$ 159,374	$ (1,276,910)
4	June 2025	$ 952,838	$ 4,136,030	$ 164,659	$ 8,298,486	$ 550,696	$ (1,176,789)	$ 206,306	$ (1,739,934)	$ 31,177	$ (1,245,733)
5	July 2025	$ 1,216,268	$ 5,352,298	$ 230,830	$ 8,529,316	$ 713,460	$ (463,329)	$ 248,812	$ (1,491,122)	$ 23,166	$ (1,222,567)
6	August 2025	$ 1,144,242	$ 6,496,540	$ 227,931	$ 8,757,247	$ 704,948	$ 241,619	$ 191,293	$ (1,299,829)	$ 20,070	$ (1,202,497)
7	September 2025	$ 989,725	$ 7,486,265	$ 181,576	$ 8,938,823	$ 623,984	$ 865,603	$ 171,007	$ (1,128,822)	$ 13,158	$ (1,189,339)
8	October 2025	$ -	$ 7,486,265	$ -	$ 8,938,823	$ -	$ 865,603	$ -	$ (1,128,822)	$ -	$ (1,189,339)
9	November 2025	$ -	$ 7,486,265	$ -	$ 8,938,823	$ -	$ 865,603	$ -	$ (1,128,822)	$ -	$ (1,189,339)
10	December 2025	$ -	$ 7,486,265	$ -	$ 8,938,823	$ -	$ 865,603	$ -	$ (1,128,822)	$ -	$ (1,189,339)
11	January 2026	$ -	$ 7,486,265	$ -	$ 8,938,823	$ -	$ 865,603	$ -	$ (1,128,822)	$ -	$ (1,189,339)
12	February 2026	$ -	$ 7,486,265	$ -	$ 8,938,823	$ -	$ 865,603	$ -	$ (1,128,822)	$ -	$ (1,189,339)
13	March 2026	$ -	$ 7,486,265	$ -	$ 8,938,823	$ -	$ 865,603	$ -	$ (1,128,822)	$ -	$ (1,189,339)
14		$ 15,824,356	$ 7,486,265	$ 10,089,826	$ 8,938,823	$ 4,373,734	$ 865,603	$ 998,451	$ (1,128,822)	$ 362,345	$ (1,189,339)

(1) From Schedule 4, Column (D), for the respective month and rate group.

(2) Calculated using Line 1, Columns (B), (D), (F), (H) or (J) less the (Refund)/Recovery for the respective month in Columns (A), (C), (E), (G) or (I), respectively.

(3) The over/(under) collection, including applicable interest, at March 31, 2025, as set forth on Schedule 1, Line 10 for the respective rate group of the Company's Final Transmission Service Charge Reconciliation Filing (M-2025-3054836) dated April 29, 2025.

(4) Represents the under-collection, including applicable interest, at September 30, 2025, as set forth on Schedule A, Line 4A of the Company's October 30, 2025 rate filing.

Schedule 3

PPL ELECTRIC UTILITIES CORPORATION
SUMMARY OF ALLOCATION OF TRANSMISSION SERVICE CHARGE REVENUES
For the Period April 1, 2024 to March 31, 2025

PPL ELECTRIC UTILITIES CORPORATION
STATEMENT OF TRANSMISSION REVENUES

Residential

Month		(A) Gross Transmission Service Charge Revenues	(B) Transmission Service Charge Revenues (Excl. Gross Receipts Tax) (1)	(C) Transmission Service Charge Revenues (Merchant Function Charge) (2)	(D) Recouped/(Refunded) Through E Factor 0.00372 $/KWH (3)		(E) Net TSC - 1 Revenue (4)
April	2025	$ 22,221,316	$ 20,910,258	$ 483,027	$ 5,033,037	(4)	$ 15,394,194
May	2025	$ 18,765,853	17,658,668	407,915	4,251,793	(4)	$ 12,998,960
June	2025	$ 18,907,202	17,791,677	410,988	164,659	(3)	$ 17,216,030
July	2025	$ 25,568,799	24,060,240	555,792	230,830	(3)	$ 23,273,618
August	2025	$ 25,246,011	23,756,496	548,775	227,931	(3)	$ 22,979,790
September	2025	$ 20,105,315	18,919,101	437,031	181,576	(3)	$ 18,300,494
October	2025	$ -	-	-	-	(3)	$ -
November	2025	$ -	-	-	-	(3)	$ -
December	2025	$ -	-	-	-	(6)	$ -
January	2026	$ -	-	-	-	(6)	$ -
February	2026	$ -	-	-	-	(6)	$ -
March	2026	$ -	-	-	-	(6)	$ -
		$ 130,814,496	$ 123,096,440	$ 2,843,528	$ 10,089,826		$ 110,163,086

(1) Column (B) times (1-GRT)
(2) Residential MFC 2.31%, Small Commercial and Industrial .23%
(3) March 31, 2025 over/(under) collection, including applicable interest, divided by the Projected Total Retail KWH Sales to Customers for the June 2025 - November 2025 application period, per Docket No. M-2025-3055748, dated April 28, 2025.
(4) Column (B) less Column (C) less Column (D) for the respective month.
(5) September 30, 2025 Over/(under) collection, including applicable interest, divided by the Projected Total Retail KWH Sales to Customers for the December 2025 - November 2026 application period dated October 31, 2025.

Schedule 4
Page 1 of 4

PPL ELECTRIC UTILITIES CORPORATION
SUMMARY OF ALLOCATION OF TRANSMISSION SERVICE CHARGE REVENUES
For the Period April 1, 2024 to March 31, 2025

Small C&I

Month		(A) Gross Transmission Service Charge Revenues	(B) Transmission Service Charge Revenues (Excl. Gross Receipts Tax) (1)	(C) Transmission Service Charge Revenues (Merchant Function Charge) (2)	(D) Recouped/(Refunded) Through E Factor 0.00267 $/KWH (3)		(E) Net TSC - 1 Revenue (4)
April	2025	$ 4,312,601	$ 4,058,158	$ 9,334	$ 885,547	(4)	$ 3,163,277
May	2025	$ 4,365,902	4,108,314	9,449	895,099	(4)	$ 3,203,766
June	2025	$ 4,375,725	4,117,557	9,470	550,696	(3)	$ 3,557,391
July	2025	$ 5,843,789	5,499,005	12,648	713,460	(3)	$ 4,772,897
August	2025	$ 5,775,085	5,434,355	12,499	704,948	(3)	$ 4,716,908
September	2025	$ 5,106,643	4,805,351	11,052	623,984	(3)	$ 4,170,315
October	2025	$ -	-	-	-	(3)	$ -
November	2025	$ -	-	-	-	(3)	$ -
December	2025	$ -	-	-	-	(6)	$ -
January	2026	$ -	-	-	-	(6)	$ -
February	2026	$ -	-	-	-	(6)	$ -
March	2026	$ -	-	-	-	(6)	$ -
		$ 29,779,745	$ 28,022,740	$ 64,452	$ 4,373,734		$ 23,584,554

(1) Column (B) times (1-GRT)
(2) Residential MFC 2.31%, Small Commercial and Industrial .23%
(3) March 31, 2025 over/(under) collection, including applicable interest, divided by the Projected Total Retail KWH Sales to Customers for the June 2025 - November 2025 application period, per Docket No. M-2025-3055748, dated April 28, 2025.
(4) Column (B) less Column (C) less Column (D) for the respective month.
(5) September 30, 2025 Over/(under) collection, including applicable interest, divided by the Projected Total Retail KWH Sales to Customers for the December 2025 - November 2026 application period dated October 31, 2025.

PPL ELECTRIC UTILITIES CORPORATION
SUMMARY OF ALLOCATION OF TRANSMISSION SERVICE CHARGE REVENUES
For the Period April 1, 2024 to March 31, 2025

Large C&I - Primary

Month		(A) Gross Transmission Service Charge Revenues	(B) Transmission Service Charge Revenues (Excl. Gross Receipts Tax) (1)	(C) Transmission Service Charge Revenues (Merchant Function Charge) (2)	(D) Recouped/(Refunded) Through E Factor (0.003) $/KWH (3)		(E) Net TSC - 1 Revenue (4)
April	2025	$ 315,991	$ 297,348	$ -	$ 94,198	(4)	$ 203,150
May	2025	$ 331,117	311,581	-	86,835	(4)	$ 224,746
June	2025	$ 447,416	421,018	-	206,306	(3)	$ 214,712
July	2025	$ 724,627	681,874	-	248,812	(3)	$ 433,062
August	2025	$ 699,976	658,677	-	191,293	(3)	$ 467,384
September	2025	$ 572,392	538,621	-	171,007	(3)	$ 367,614
October	2025	$ -	-	-	-	(3)	$ -
November	2025	$ -	-	-	-	(3)	$ -
December	2025	$ -	-	-	-	(6)	$ -
January	2026	$ -	-	-	-	(6)	$ -
February	2026	$ -	-	-	-	(6)	$ -
March	2026	$ -	-	-	-	(6)	$ -
		$ 3,091,519	$ 2,909,119	$ -	$ 998,451		$ 1,910,668

(1) Column (B) times (1-GRT)
(2) Residential MFC 2.31%, Small Commercial and Industrial .23%
(3) March 31, 2025 over/(under) collection, including applicable interest, divided by the Projected Total Retail KWH Sales to Customers for the June 2025 - November 2025 application period, per Docket No. M-2025-3055748, dated April 28, 2025.
(4) Column (B) less Column (C) less Column (D) for the respective month.
(5) September 30, 2025 Over/(under) collection, including applicable interest, divided by the Projected Total Retail KWH Sales to Customers for the December 2025 - November 2026 application period dated October 31, 2025.

PPL ELECTRIC UTILITIES CORPORATION
SUMMARY OF ALLOCATION OF TRANSMISSION SERVICE CHARGE REVENUES
For the Period April 1, 2024 to March 31, 2025

Large C&I - Transmission

Month		(A) Gross Transmission Service Charge Revenues	(B) Transmission Service Charge Revenues (Excl. Gross Receipts Tax) (1)	(C) Transmission Service Charge Revenues (Merchant Function Charge) (2)	(D) Recouped/(Refunded) Through E Factor 0.025 $/KWH (3)		(E) Net TSC - 1 Revenue (4)
April	2025	$ 122,059	$ 114,858	$ -	$ 115,400	(4)	$ (542)
May	2025	$ 333,939	314,237	-	159,374	(4)	$ 154,863
June	2025	$ 206,599	194,410	-	31,177	(3)	$ 163,233
July	2025	$ 294,648	277,264	-	23,166	(3)	$ 254,098
August	2025	$ 332,059	312,468	-	20,070	(3)	$ 292,398
September	2025	$ 223,539	210,350	-	13,158	(3)	$ 197,192
October	2025	$ -	-	-	-	(3)	$ -
November	2025	$ -	-	-	-	(3)	$ -
December	2025	$ -	-	-	-	(6)	$ -
January	2026	$ -	-	-	-	(6)	$ -
February	2026	$ -	-	-	-	(6)	$ -
March	2026	$ -	-	-	-	(6)	$ -
		$ 1,512,843	$ 1,423,587	$ -	$ 362,345		$ 1,061,242

(1) Column (B) times (1-GRT)
(2) Residential MFC 2.31%, Small Commercial and Industrial .23%
(3) March 31, 2025 over/(under) collection, including applicable interest, divided by the Projected Total Retail KWH Sales to Customers for the June 2025 - November 2025 application period, per Docket No. M-2025-3055748, dated April 28, 2025.
(4) Column (B) less Column (C) less Column (D) for the respective month.
(5) September 30, 2025 Over/(under) collection, including applicable interest, divided by the Projected Total Retail KWH Sales to Customers for the December 2025 - November 2026 application period dated October 31, 2025.

PPL ELECTRIC UTILITIES CORPORATION
KWH SALES BY MONTH

Line No.	Description	(A) April 2025	(B) May 2025	(C) June 2025	(D) July 2025	(E) August 2025	(F) September 2025	(G) October 2025	(H) November 2025	(I) December 2025	(J) January 2026	(K) February 2026	(L) March 2026	(M) Total Year-to-date
Residential														
1	Actual KWH Sales Billed	1,063,518,183	897,151,218	930,992,651	1,298,599,953	1,276,945,193	1,015,108,780	-	-	-	-	-	-	6,482,315,978
2	Less: Shoppers	436,738,938	367,662,630	382,130,406	529,165,665	517,176,829	409,854,821	-	-	-	-	-	-	2,642,729,289
3	Net KWH	626,779,245	529,488,588	548,862,245	769,434,288	759,768,364	605,253,959	-	-	-	-	-	-	3,839,586,689
4	Loss Factor	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	
5	KWH for Use in Energy Allocation	677,217,619	572,097,758	593,030,458	831,352,443	820,908,679	653,960,143	-	-	-	-	-	-	
6	KWH % for Energy Expense Allocation	80.2%	77.2%	78.1%	79.6%	79.8%	78.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Small Commercial & Industrial														
7	Actual KWH Sales Billed	771,056,703	781,468,462	799,556,648	949,290,757	943,522,839	865,601,705	-	-	-	-	-	-	5,110,497,114
8	Less: Shoppers	626,595,493	635,449,038	656,889,314	764,456,475	760,893,901	703,947,777	-	-	-	-	-	-	4,148,231,998
9	Net KWH	144,461,210	146,019,424	142,667,334	184,834,282	182,628,938	161,653,928	-	-	-	-	-	-	962,265,116
10	Loss Factor	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	1.08047231	
11	KWH for Use in Energy Allocation	156,086,337	157,769,944	154,148,104	199,708,324	197,325,511	174,662,593	-	-	-	-	-	-	
12	KWH % for Energy Expense Allocation	18.5%	21.3%	20.3%	19.1%	19.2%	20.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Large Commercial & Industrial - Primary														
13	Actual KWH Sales Billed	469,818,840	486,891,760	502,659,990	554,442,860	565,467,850	532,140,040	-	-	-	-	-	-	3,111,421,340
14	Less: Shoppers	460,196,960	478,022,000	492,835,910	542,594,660	556,358,660	523,996,860	-	-	-	-	-	-	3,054,005,050
15	Net KWH	9,621,880	8,869,760	9,824,080	11,848,200	9,109,190	8,143,180	-	-	-	-	-	-	57,416,290
16	Loss Factor	1.05364821	1.05364821	1.05364821	1.05364821	1.05364821	1.05364821	1.05364821	1.05364821	1.05364821	1.05364821	1.05364821	1.05364821	
17	KWH for Use in Energy Allocation	10,138,077	9,345,607	10,351,124	12,483,835	9,597,882	8,580,047	-	-	-	-	-	-	
18	KWH % for Energy Expense Allocation	1.2%	1.3%	1.4%	1.2%	0.9%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Large Commercial & Industrial - Transmission														
19	Actual KWH Sales Billed	488,984,820	513,491,640	504,668,320	518,009,000	551,770,200	507,935,400	-	-	-	-	-	-	3,084,859,380
20	Less: Shoppers	487,778,970	511,826,290	502,936,270	516,722,000	550,655,200	507,204,400	-	-	-	-	-	-	3,077,123,130
21	Net KWH	1,205,850	1,665,350	1,732,050	1,287,000	1,115,000	731,000	-	-	-	-	-	-	7,736,250
22	Loss Factor	1.0268241	1.0268241	1.0268241	1.0268241	1.0268241	1.0268241	1.0268241	1.0268241	1.0268241	1.0268241	1.0268241	1.0268241	
23	KWH for Use in Energy Allocation	1,238,196	1,710,022	1,778,511	1,321,523	1,144,909	750,608	-	-	-	-	-	-	
24	KWH % for Energy Expense Allocation	0.1%	0.2%	0.2%	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Total														
25	Actual KWH Sales Billed	2,793,378,546	2,679,003,080	2,737,877,609	3,320,342,570	3,337,706,082	2,920,785,925	-	-	-	-	-	-	17,789,093,812
26	Less: Shoppers	2,011,310,361	1,992,959,958	2,034,791,900	2,352,938,800	2,385,084,590	2,145,003,858	-	-	-	-	-	-	12,922,089,467
27	Net KWH	782,068,185	686,043,122	703,085,709	967,403,770	952,621,492	775,782,067	-	-	-	-	-	-	4,867,004,345
28	KWH for Use in Energy Allocation	844,680,229	740,923,331	759,308,197	1,044,866,125	1,028,976,981	837,953,391	-	-	-	-	-	-	5,256,708,254

Schedule 4A

PPL ELECTRIC UTILITIES CORPORATION
INTEREST EXPENSE ON TRANSMISSION SERVICE CHARGE
OVER/(UNDER) COLLECTIONS BY MONTH

		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
				Total		Residential		Small Comm. & Industrial		Large Comm. & Industrial - Primary		Large Comm. & Industrial - Transmission	
Line No.	Month	Interest Rate (3)	Weighting Factor (number of months) (2)	Over/(Under) Collection Total (1)	Interest on Over/(Under) Collection	Over/(Under) Collection	Interest on Over/(Under) Collection	Over/(Under) Collection	Interest on Over/(Under) Collection	Over/(Under) Collection	Interest on Over/(Under) Collection	Over/(Under) Collection	Interest on Over/(Under) Collection
1	April 2025	6.00%	14	$ (5,198,604)	$ (363,902)	$ (3,985,627)	$ (278,994)	$ (877,053)	$ (61,394)	$ (268,034)	$ (18,762)	$ (67,890)	$ (4,752)
2	May 2025	6.00%	13	(9,661,815)	(628,018)	(7,631,815)	(496,068)	(1,880,041)	(122,203)	(231,616)	(15,055)	81,657	5,308
3	June 2025	6.00%	12	(3,478,919)	(208,735)	(2,344,748)	(140,685)	(994,321)	(59,659)	(204,739)	(12,284)	64,889	3,893
4	July 2025	6.00%	11	2,810,162	154,558	3,050,641	167,785	294,116	16,176	(713,144)	(39,223)	178,549	9,820
5	August 2025	6.00%	10	2,971,509	148,575	2,635,026	131,751	321,718	16,086	(222,990)	(11,150)	237,755	11,888
6	September 2025	6.00%	9	(1,587,991)	(71,460)	(1,556,338)	(70,035)	(92,795)	(4,176)	(85,091)	(3,829)	146,233	6,580
7	October 2025	6.00%	20	-	-	-	-	-	-	-	-	-	-
8	November 2025	6.00%	19	-	-	-	-	-	-	-	-	-	-
9	December 2025	6.00%	18	-	-	-	-	-	-	-	-	-	-
10	January 2026	6.00%	17	-	-	-	-	-	-	-	-	-	-
11	February 2026	6.00%	16	-	-	-	-	-	-	-	-	-	-
12	March 2026	6.00%	15	-	-	-	-	-	-	-	-	-	-
13				$ (14,145,658)	$ (968,982)	(9,832,861)	$ (686,246)	$ (3,228,376)	$ (215,170)	$ (1,725,614)	$ (100,303)	$ 641,193	$ 32,737

(1) From Schedule 2, Lines 5, 9, 13 or 17 for the respective month and rate group.

(2) The interest calculation uses the over/(under) collections shown in columns E, G, I, or K times the interest rate in column (A) divided by 12 to obtain the monthly interest amount. The monthly amount calculated then is multiplied by the number of months in column (B).

(3) In accordance with the order approved at the June 11, 2015 Public Meeting at Docket No. L-2014-2421001, the over/(under) collections for the default service adjustment clauses (GSC and TSC) are calculated at the Prime rate of interest for commercial banking, not to exceed the legal rate of interest (i.e., 6%).

Schedule 5

PPL ELECTRIC UTILITIES CORPORATION

ACTUAL PJM-BILLED TRANSMISSION SERVICE EXPENSES BY MONTH (Allocatable Costs)

Line No.	Description	(A) April 2025	(B) May 2025	(C) June 2025	(D) July 2025	(E) August 2025	(F) September 2025	(G) October 2025	(H) November 2025	(I) December 2025	(J) January 2026	(K) February 2026	(L) March 2026	(M) Total Year-to-date
Demand Components														
1	Network Transmission Service Charge	$ 21,620,524	$ 22,556,063	$ 22,038,482	$ 22,784,371	$ 22,891,988	$ 22,277,228	$ -	$ -	$ -	$ -	$ -	$ -	$ 134,168,656
2	Network Transmission Service Charge - Call Option	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Seams Elimination Cost Assignment - SECA Call Option	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Reactive Supply and Voltage Control from Generation Sources Service	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Reactive Services Charges	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Black Start Service	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Transmission Losses (Point-to-Point) Credits	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Non-Firm Point-to-Point Transmission Service Credits	(33,089)	(38,422)	(31,481)	(29,695)	(31,636)	(32,475)	-	-	-	-	-	-	(196,798)
9	Transmission Enhancement Charges	860,110	868,382	861,700	852,895	864,848	869,677	-	-	-	-	-	-	5,177,612
10	Generation Deactivation	-	-	-	(513)	30,579	47,056	-	-	-	-	-	-	77,122
11	PJM Schedule 13 Expansion Cost Recovery Mechanism	-	-	-	-	-	-	-	-	-	-	-	-	-
12	PJM Customer Payment Defaults	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Deferred Tax Adjustment	1,532	1,532	1,536	1,529	1,527	1,526	-	-	-	-	-	-	9,182
14	PJM Settlement, Inc.	325	334	379	343	335	319	-	-	-	-	-	-	2,035
15	Secondary Reserve	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Total Demand Components	$ 22,449,402	$ 23,387,889	$ 22,870,616	$ 23,608,930	$ 23,757,641	$ 23,163,331	$ -	$ -	$ -	$ -	$ -	$ -	$ 139,237,809
Energy Components														
17	Reliability First Corporation Charge (RFC)	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Consumer Advocates of PJM States, Inc	-	-	-	-	-	-	-	-	-	-	-	-	-
19	PJM System Control and Dispatch Service	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Transmission Owner Scheduling, System Control and Dispatch Service	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Regulation and Frequency Response Service	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Day Ahead Scheduling Reserve	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Operating Reserve - Supplemental Reserve Service	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Day Ahead	-	-	-	-	-	-	-	-	-	-	-	-	-
25	Real Time (Balancing)	-	-	-	-	-	-	-	-	-	-	-	-	-
26	Synchronous Condensing Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Operating Reserve - Spinning Reserve Service	-	-	-	-	-	-	-	-	-	-	-	-	-
28	North American Electric Reliability Corporation Charge (NERC)	-	-	-	-	-	-	-	-	-	-	-	-	-
29	PJM West Transition Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Non-Synchronized Reserve	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Michigan-Ontario Phase Angle Regulators	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total Energy Components	-	-	-	-	-	-	-	-	-	-	-	-	-
33	Total	$ 22,449,402	$ 23,387,889	$ 22,870,616	$ 23,608,930	$ 23,757,641	$ 23,163,331	$ -	$ -	$ -	$ -	$ -	$ -	$ 139,237,809
	Demand Factors													
34	Residential	80.61%	80.51%	80.26%	80.50%	80.58%	80.66%	80.66%	80.66%	80.66%	80.66%	80.66%	80.66%	
35	Small Commercial & Industrial	17.69%	17.84%	17.71%	17.92%	18.04%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%	
36	Large Commercial & Industrial - Primary	1.40%	1.34%	1.60%	1.26%	1.15%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
37	Large Commercial & Industrial - Transmission	0.30%	0.31%	0.43%	0.32%	0.23%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	0.22%	
	Energy Factors (Schedule 4A, row 6, 12, 18, and 24)													
38	Residential	80.2%	77.2%	78.1%	79.6%	79.8%	78.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
39	Small Commercial & Industrial	18.5%	21.3%	20.3%	19.1%	19.2%	20.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
40	Large Commercial & Industrial - Primary	1.2%	1.3%	1.4%	1.2%	0.9%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
41	Large Commercial & Industrial - Transmission	0.1%	0.2%	0.2%	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	Demand Expense Allocation													
42	Residential	$ 18,096,463	$ 18,830,612	$ 18,355,956	$ 19,005,189	$ 19,143,907	$ 18,683,543	$ -	$ -	$ -	$ -	$ -	$ -	$ 112,115,670
43	Small Commercial & Industrial	3,971,299	4,171,264	4,050,386	4,230,720	4,285,878	4,169,400	-	-	-	-	-	-	24,878,947
44	Large Commercial & Industrial - Primary	314,292	312,807	365,930	297,473	273,213	259,429	-	-	-	-	-	-	1,823,144
45	Large Commercial & Industrial - Transmission	67,348	73,206	98,344	75,549	54,643	50,959	-	-	-	-	-	-	420,049
	Energy Expense Allocation													
46	Residential	-	-	-	-	-	-	-	-	-	-	-	-	-
47	Small Commercial & Industrial	-	-	-	-	-	-	-	-	-	-	-	-	-
48	Large Commercial & Industrial - Primary	-	-	-	-	-	-	-	-	-	-	-	-	-
49	Large Commercial & Industrial - Transmission	-	-	-	-	-	-	-	-	-	-	-	-	-
	Total													
50	Residential	$ 18,096,463	$ 18,830,612	$ 18,355,956	$ 19,005,189	$ 19,143,907	$ 18,683,543	$ -	$ -	$ -	$ -	$ -	$ -	$ 112,115,670
51	Small Commercial & Industrial	3,971,299	4,171,264	4,050,386	4,230,720	4,285,878	4,169,400	-	-	-	-	-	-	24,878,947
52	Large Commercial & Industrial - Primary	314,292	312,807	365,930	297,473	273,213	259,429	-	-	-	-	-	-	1,823,144
53	Large Commercial & Industrial - Transmission	67,348	73,206	98,344	75,549	54,643	50,959	-	-	-	-	-	-	420,049
54	Total Demand and Energy Expenses	$ 22,449,402	$ 23,387,889	$ 22,870,616	$ 23,608,931	$ 23,757,641	$ 23,163,331	$ -	$ -	$ -	$ -	$ -	$ -	$ 139,237,810

Schedule 6

PPL ELECTRIC UTILITIES CORPORATION
ACTUAL PJM-BILLED TRANSMISSION SERVICE EXPENSES BY MONTH (Direct Charges) - Residential Only

Line No.	Description	(A) April 2025	(B) May 2025	(C) June 2025	(D) July 2025	(E) August 2025	(F) September 2025	(G) October 2025	(H) November 2025	(I) December 2025	(J) January 2026	(K) February 2026	(L) March 2026	(M) Total Year-to-date
Demand Components														
1	Network Transmission Service Charge	$ 978,895	$ 1,011,003	$ 982,429	$ 1,010,801	$ 1,009,818	$ 976,290	$ -	$ -	$ -	$ -	$ -	$ -	$ 5,969,236
2	Network Transmission Service Charge - Call Option	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Seams Elimination Cost Assignment - SECA Call Option	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Reactive Supply and Voltage Control from Generation Sources Service	42,346	41,895	41,992	41,528	41,225	41,495	-	-	-	-	-	-	250,481
5	Reactive Services Charges	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Black Start Service	3,102	3,077	2,801	2,770	2,340	2,862	-	-	-	-	-	-	16,952
7	Transmission Losses (Point-to-Point) Credits	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Non-Firm Point-to-Point Transmission Service Credits	(1,499)	(1,723)	(1,404)	(1,317)	(1,396)	(1,423)	-	-	-	-	-	-	(8,762)
9	Transmission Enhancement Charges	38,943	38,922	38,413	37,828	38,151	38,113	-	-	-	-	-	-	230,370
10	Generation Deactivation	-	-	-	(23)	1,357	2,076	-	-	-	-	-	-	3,410
11	PJM Schedule 13 Expansion Cost Recovery Mechanism	-	-	-	-	-	-	-	-	-	-	-	-	-
12	PJM Customer Payment Defaults	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Total Demand Components	1,061,787	1,093,174	1,064,231	1,091,587	1,091,495	1,059,413	-	-	-	-	-	-	6,461,687
Energy Components														
14	Reliability First Corporation Charge (RFC)	$ 2,194	$ 2,359	$ 2,281	$ 2,358	$ 2,355	$ 2,269	$ -	$ -	$ -	$ -	$ -	$ -	13,816
15	Consumer Advocates of PJM States, Inc	55	56	54	56	56	54	-	-	-	-	-	-	331
16	PJM System Control and Dispatch Service	38,444	40,036	31,429	31,421	33,126	33,847	-	-	-	-	-	-	208,303
17	Transmission Owner Scheduling, System Control and Dispatch Service	4,844	4,925	4,763	4,923	4,918	4,737	-	-	-	-	-	-	29,110
18	Regulation and Frequency Response Service	20,056	18,724	26,675	20,135	16,184	21,991	-	-	-	-	-	-	123,765
19	Day Ahead Scheduling Reserve	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Operating Reserve - Supplemental Reserve Service	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Day Ahead	4,163	3,094	5,014	1,812	2,569	899	-	-	-	-	-	-	17,551
22	Real Time (Balancing)	35,349	11,810	12,835	20,792	11,193	9,198	-	-	-	-	-	-	101,177
23	Synchronous Condensing Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Operating Reserve - Spinning Reserve Service	17,965	14,500	12,961	18,707	9,269	10,423	-	-	-	-	-	-	83,825
25	North American Electric Reliability Corporation Charge (NERC)	1,575	1,690	1,634	1,689	1,687	1,625	-	-	-	-	-	-	9,900
26	PJM West Transition Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Non-Synchronized Reserve	2,288	1,563	562	1,971	824	1,249	-	-	-	-	-	-	8,457
28	Michigan-Ontario Phase Angle Regulators	-	-	-	-	-	-	-	-	-	-	-	-	-
29	PJM Settlement, Inc.	911	941	1,011	898	897	873	-	-	-	-	-	-	5,531
30	Secondary Reserve	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Total Energy Components	127,844	99,698	99,219	104,762	83,078	87,165	-	-	-	-	-	-	601,766
32	Total	$ 1,189,631	$ 1,192,872	$ 1,163,450	$ 1,196,349	$ 1,174,573	$ 1,146,578	$ -	$ -	$ -	$ -	$ -	$ -	$ 7,063,453

Schedule 6A

Supplement No. 2 to Electric Pa. P.U.C. No. 202
Original Page No. 35C

PPL Electric Utilities Corporation

RATE SCHEDULE LP-6
LARGE LOAD INTERCONNECTIONS

APPLICATION RATE SCHEDULE LP-6

This Rate Schedule is for large general service supplied from available lines of 69,000 volts or higher to large load (data center) customers that commenced service on or after October 1, 2025, and have a peak electric demand of 50 MW or greater at a single facility or at least equal to 75 MW in the aggregate among facilities taking service from PPL Electric at or above 69 kV within a 10-mile radius; provided, however, if (1) the customer has a peak electric demand equal to or greater than 50 MW at a single facility but less than or equal to 75 MW at a single facility that takes service from PPL Electric at or above 69 kV, and (2) the customer's interconnection and service requirements do not cause PPL Electric to incur transmission network upgrade costs, then PPL Electric may file a petition with the Commission requesting, subject to Commission review and approval, that the customer's facility be classified under Rate LP-5 and that the customer's peak demand for that single facility not be counted toward the peak demand in the aggregate among the customer's facilities taking service from PPL Electric at or above 69 kV within a 10-mile radius. Any petition filed under this section requesting a customer to be classified as a Rate LP-5 customer shall be served on all the parties at Docket No. R-2025-3057164.

NET MONTHLY RATE

Distribution Charge

$999.11 per month (Customer Charge)

Transmission Service Charge

The customer is responsible for applicable charges under the TSC rate schedule.

Generation Supply Charge -2

The customer is responsible for applicable charges under the GSC-2 rate schedule.

Universal Service Rider Costs

Rate LP-6 customers will be assessed a non-bypassable customer charge to recover an allocated portion of USR costs, as set forth in the Universal Service Rider provisions of this Tariff.

MINIMUM CHARGE

The Monthly Minimum Distribution Charge is the Customer Charge.

BILLING KW

The Billing KW for the Transmission component is based on the customer's peak load contribution to the PJM peak load.

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PPL Electric Utilities Corporation

RATE SCHEDULE LP-6 (CONTINUED)

RIDERS

The Riders included in this Tariff that apply to this Rate Schedule are listed in the Rider Matrix on Page 18.

STATE TAX ADJUSTMENT SURCHARGE

The State Tax Adjustment Surcharge included in this Tariff is applied to charges under this Rate Schedule.

PAYMENT

The above net rate applies when bills are paid on or before the due date specified on the bill, which is not less than 15 days from the date bill is mailed via the U.S. Postal Service or mailed electronically. When not so paid, the gross rate applies, which is the above net rate plus 5% on the first $200.00 of the then unpaid balance of the monthly bill and 2% on the remainder thereof.

ELECTRIC SERVICE AGREEMENT

As condition of receiving distribution utility service under Rate LP-6, each LP-6 customer must execute an Electric Service Agreement ("ESA") governing the customer's interconnection to the transmission system at voltages equal to or greater than 69 kV, including the constructing, maintaining, and operating of transmission facilities. The ESA must be entered into pursuant to and consistent with the following terms and conditions:

(1) The ESA will contain an initial term of not less than ten (10) years;
(2) The ESA will require the customer to provide an initial load ramp schedule for up to the first five (5) years of the initial term (for the avoidance of doubt, this requirement is not intended to prohibit and does not prohibit the use of an initial load ramp schedule for a period that does not exceed the initial term of the ESA);
(3) The ESA will require the LP-6 customer to provide security in an amount equal to the cost of upgrades needed to serve the customer, including, but not limited to, the costs that the Company would not have incurred but for the interconnection of the customer, that are placed into rate base and recovered through transmission rates (such amount is referred to as the "Rate Base Security Obligation");
(4) The ESA will require the security to be provided in the form of a letter of credit, parent guarantee, or other security instrument acceptable to the Company for the amount of the outstanding revenue guarantee;
(5) The ESA will prescribe that in the event of default, the Company shall draw on the security instrument in the amount of the outstanding revenue guarantee and apply the funds to the remaining cost of the line extension that was not directly charged to the customer;
(6) The ESA will specify that the revenue guarantee shall be satisfied when the Company has received transmission revenue from the customer equaling the Rate Base Security Obligation;

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Original Page No. 35E

PPL Electric Utilities Corporation

RATE SCHEDULE LP-6 (CONTINUED)

(7) Until the LP-6 customer's Rate Base Security Obligation is satisfied, the ESA will require the customer to pay applicable rates based on the greater of actual peak demand values, or 80% of the load provided in the load ramp schedule;
(8) After the LP-6 customer's Rate Base Security Obligation is satisfied, the ESA will require the customer to pay applicable rate based on the greater of actual peak demand values, or 80% of the load provided in the load ramp schedule for the first (5) years of the initial term and 50% for the second five (5) years of the initial term;
(9) The ESA will contain an exit fee that is equal to the remaining minimum load guarantee obligation during the ESA term at the time the customer terminates the ESA, or the remaining amount of the Rate Base Security Obligation, whichever is greater;
(10) The ESA will require a contribution in aid of construction ("CIAC") as up-front milestone payments ahead of work performed for the cost of directly assignable transmission and distribution upgrades; and
(11) To the extent that there is critical load, the ESA shall require the LP-6 customer to engineer the substation and other distribution- side and customer-side infra-structure to enable the large load customer, during load shedding, to segment and separate critical load from non-critical load, as such terms are defined in PPL Electric's load control and emergency conservation procedures developed pursuant to 52 Pa. Code § 57.52(b), and that the substation, other distribution-side infrastructure, and customer-side infrastructure be operated such that non-critical load at the point of interconnection can be shed without affecting the operations of the critical load.

The exit fee will first be applied to the Rate Base Security Obligation as a reduction to the Company's transmission rate base, and the remainder of the exit fee will be as a credit to the Company's Federal Energy Regulatory Commission ("FERC") Transmission Formula Rate revenue requirement.

The Company also will submit compliant ESAs and a breakdown of the allocation of system upgrade costs to the Commission for transparency and information and will serve the same on the statutory advocates. PPL Electric will provide notice to the Commission and statutory advocates in the event that a Rate LP-6 customer voluntarily terminates the service contract before the contract has elapsed, including reporting if and when the customer's exit fee was provided as a credit to PPL Electric's transmission rate base balance.

VOLUNTARY INTERRUPTIBLE OPTION

The customer may elect to receive voluntary interruptible service under this Rate Schedule instead of firm service. If voluntary interruptible service is chosen by the customer, the minimum load guarantee in the customer's ESA would be reduced to 60% for the first five years and 30% for the second five years.

PPL Electric Utilities Corporation

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RATE SCHEDULE LP-6 (CONTINUED)

LOAD FORECASTS

The Company will submit annual load forecasts to the Commission, along with a breakdown of forecasted load based on requests of customers with ESAs, Letters of Authorization ("LOAs"), and inquiries and shall include such breakdown along with forecasts submitted to PJM Interconnection, LLC ("PJM"). PPL Electric's requirements under this paragraph will be consistent with its obligations under Act 45 of 2025 regarding Electric Load Forecast Accountability, Sections 1801-B through 1806-B, and any information not covered by this paragraph but required by the Act must still be submitted by PPL Electric to the Commission.

PPL Electric estimates that for this specific project, assuming $38.4M of costs in PPL Electric's transmission rate base, a load increase of 12 MW, the customer shops for their energy supply, and the project is in-service at full load today, the Company estimates the Transmission Service Charge (TSC) impacts below:

	Current Rate As of January 1, 2026	~$38.4M Capital Investment + ~12 MW Increase	Difference
PPL Electric TSC Rate as of December 1, 2026			
Residential ($/kWh)	$ 0.03343	$ 0.03304	$ (0.00039)
Small Commercial & Industrial (SC&I) ($/kWh)	$ 0.03302	$ 0.03285	$ (0.00017)
Large Commercial & Industrial-Primary (LC&I-P) ($/kW)	$ 21.64700	$ 21.60000	$ (0.04700)
Large Commercial & Industrial-Transmission (LC&I-T) ($/kW)	$ 18.66300	$ 18.60700	$ (0.05600)

FERC Formula Rate and Transmission Service Charge Analysis

Prepared January 6, 2026

Capital Investment	Current Rate As of January 1, 2026	~$38.4M Capital Investment + ~12 MW Increase	Difference
FFR Impact			
Revenue Requirement	$ 889,895,496	$ 894,539,683	
1 CP Peak	8,057	8,069	
Rate ($/MW-Year)	$ 110,450	$ 110,861	
TSC Impact			
NITS Rate ($/MWD)	$ 307.87	$ 309.00	
TSC Rate - *Assuming that additonal load is shopping*			
NITS Cost Allocated to Customer Groups			
Res	$ 242,958,431	$ 243,875,814	
SC&I	50,524,246	50,709,037	
LC&I-P	3,136,501	3,147,973	
LC&I-T	616,098	618,352	
Total	$ 297,235,277	$ 298,351,175	
Allocation of Demand Costs(including NITS)			
Res	80.66%	80.67%	
SC&I	18.00%	18.00%	
LC&I-P	1.12%	1.12%	
LC&I-T	0.22%	0.22%	
Total	100.00%	100.01%	
Other Expenses			
Res	$ 11,287,765	$ 11,288,782	
SC&I	4,967,755	4,967,755	
LC&I-P	4,990,741	4,990,741	
LC&I-T	537,273	537,273	
Total	$ 21,783,534	$ 21,784,552	
Total TSC Revenue Requirement			
Res	$ 254,246,195	$ 255,164,596	$ 918,400
SC&I	$ 55,492,001	$ 55,676,792	
LC&I-P	$ 8,127,243	$ 8,138,714	
LC&I-T	$ 1,153,372	$ 1,155,625	$ 2,253
Total	$ 319,018,811	$ 320,135,727	$ 1,116,916
Billing Determinant			
Res (kWh)	8,208,248,491	8,208,248,491	
SC&I (kWh)	1,801,061,542	1,801,061,542	
LC&I-P (Billing Demand kW)	400,418	400,418	
LC&I-T (PLC MW)	66.0	66.0	
PPL Electric TSC Rate as of December 1, 2026			
Residential ($/kWh)	$ 0.03343	$ 0.03304	$ (0.00039)
Small Commercial & Industrial (SC&I) ($/kWh)	$ 0.03302	$ 0.03285	$ (0.00017)
Large Commercial & Industrial-Primary (LC&I-P) ($/kW)	$ 21.647	$ 21.600	$ (0.047)
Large Commercial & Industrial-Transmission (LC&I-T) ($/kW)	$ 18.663	$ 18.607	$ (0.056)
Residential (1,000 kWh) savings/month			$ (0.39)
Residential (1,000 kWh) savings/year			$ (4.68)

Transmission Service Charge (TSC) Analysis

Prepared January 6, 2026

		Assumes Additional Load is Shopping ~$38.4M Capital Investment + ~12 MW Increase
NITS Rate Inputs		
NITS Rate (Formula Rate)	$ 307.8712	$ 308.9973
Non-Shopping Demand (PLC MW)	2,492.10	2,492.10
Non-Shopping Demand -NYPA, Block (PLC MW)	102.00	102.00
Days in the Year	365	365
Expense Summary		
Res Expenses	$ 258,227,890	$ 255,164,596
SC&I Expenses	$ 55,960,325	$ 55,676,792
LC&I-P Expenses	$ 8,156,316	$ 8,138,714
LC&I-T Expenses	$ 1,159,082	$ 1,155,625
Total Expenses	$ 323,503,613	$ 320,135,727
Rates		
Res	$ 0.03343	$ 0.03304
SC&I	$ 0.03302	$ 0.03285
LC&I-P	$ 21.647	$ 21.600
LC&I-T	$ 18.663	$ 18.607
Supporting Data:		
Expense Breakdown		
NITS Charges	$ 282,640,567	$ 281,069,006
Other Demand Costs (TEC, Etc.)	$ 9,938,244	$ 9,938,244
Total Allocated Demand Costs	$ 292,578,811	$ 291,007,250
Res Energy Components	$ 1,430,548	$ 1,430,548
Res Directly Assignable NITS	$ 13,257,981	$ 11,503,968
Res Directly Assignable Other	$ -	$ -
Net Metering SC&I	$ 589,504	$ 589,504
Net Metering LC&I	$ 1,924,694	$ 1,924,694
Demand (PLC MW)		
Res excl block	2,010.30	2,010
SC&I	448.50	449
LC&I-P	27.80	28
LC&I-T	5.50	6
Total	2,492.10	2,492
Demand % (Used to Allocate Expenses)		
Res	80.66%	80.67%
SC&I	18.00%	18.00%
LC&I-P	1.12%	1.12%
LC&I-T	0.22%	0.22%
	100.00%	100.01%
Rate Divisor		
Res (kWh)	8,208,248,491	8,208,248,491
SC&I (kWh)	1,801,061,542	1,801,061,542
LC&I-P (Billing Demand kW)	400,418	400,418
LC&I-T (PLC MW)	66.00	66.00
E-Factor (under/(over) collection)		
Res	$ 1,580,284	$ 1,580,284
SC&I	2,577,943	2,577,943
LC&I-P	2,954,739	2,954,739
LC&I-T	515,409	515,409
	$ 7,628,375	$ 7,628,375
MFC Gross-Up		
Res	1.023646	1.023646
SC&I	1.002305	1.002305

Note:
FERC Formula Rate uses a calendar year period - January ->December. FERC Formula Rate values here reflect 2026 rate period. Transmission Service Charge is on a December->November period (uses 2 different FERC Formula Rates). TSC values here reflect December 1, 2025 through November 30, 2026 rate period.

FERC Formula Rare Analysis
PA FERC Formula Rate Sensitivity
Prepared January 6, 2026

		FERC Transmission Formula Rate as of November 6, 2026 for the Period January 1, 2026 through December 31, 2026		~$38.4M Capital Investment + ~12 MW Increase
Total Plant In Rate Base	$	9,634,763,264	$	38,400,000
Total Accumulated Depreciation		1,233,663,734		(914,286)
ADIT		(1,248,355,402)		(621,714)
Other		11,589,224		-
Rate Base		7,164,333,354		36,864,000
Debt %		44.0%		44.00%
Equity %		56.0%		56.00%
Cost of Debt		4.71%		4.71%
Common Cost		10.50%		10.50%
Rate of Return		7.95%		7.95%
Investment Return	$	569,847,194	$	2,931,573
State & Fed Tax		26.92%		26.92%
T / (1-T)		36.83%		36.83%
Income Tax Component	$	155,008,609		798,328
Total Transmission Depreciation & Amortization Expense		183,111,796	$	914,286
Rev Req Impact	N/A			4,644,187
Net Zonal Revenue Requirement	$	889,895,496	$	894,539,683
1 CP Peak		8,057.0		8,069.0
PPL Electric Rate ($/MW-Year)	$	110,450	$	110,861
Variance to current rate			**$**	**411**
% Variance to current rate				**0.4%**
AE Coop	$	392	$	392
UGI (as of 5/15/2025)	$	1,531	$	1,531
PPL Zone NITS Charge ($/MWD)	$	307.8712	$	308.9973
Variance to prior rate			**$**	**411**
% Variance to prior rate				**0.4%**

January 1, 2026 Bill Calculation

Tariff Schedule		**RS**	**GS1**	**GS3**
KwH		1,000	1,000	15,000
KW		0	4	75
ICAP		0	0	0
Customer				
Base Distr		14.09	22.00	60.00
SMR2		1.40	2.84	2.84
CER		(0.01)	(0.01)	(0.01)
SDER (Cust)		-	-	-
Variable				
Base Distr		35.34	17.44	298.88
ACR4		2.20	1.66	24.90
SDER (variable)		1.90	0.94	14.10
USR		10.24	-	-
		65.16	44.87	400.71
TCJA	-3.750%	(1.85)	(1.48)	(13.46)
DSIC	7.500%	4.75	3.25	29.04
		68.06	46.64	416.29
STAS D	-0.311%	(0.211700)	(0.145100)	(1.294700)
Total Distribution		**67.84**	**46.50**	**414.99**
Energy		96.10	93.79	1,406.85
Transmission		33.43	33.02	495.30
STAS E&T		0.001295	0.001268	0.019022
Total Bill Per Month		**197.38**	**173.31**	**2,317.16**
PTC		129.53	126.81	1,902.17

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 1-RJ

REJOINDER TESTIMONY OF JOSEPH LOOKUP

TOPICS ADDRESSED: **OVERVIEW OF REJOINDER**
SCOPE OF THE PROCEEDING
PROJECT ENGINEERING AND DESIGN
NECESSITY OF THE PROJECT

DATE: SEPTEMBER 14, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Joseph Lookup, and my business address is 827 Hausman Road, Allentown, Pennsylvania 18104.

Q. Did you previously submit testimony in this proceeding on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company")?

A. Yes. On May 13, 2026, I submitted my direct testimony, PPL Electric Statement No. 1, and on August 7, 2026 I submitted my rebuttal testimony, PPL Electric Statement No. 1-R, in connection with the "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 Needed to Connect the Existing Susquehanna-Harwood #1 and #2 Transmission Lines to the New Tomhicken 230 kV Switchyard, All Located in Luzerne County, Pennsylvania," at Docket No. A-2025-3059443 (the "Tomhicken 230 kV Switchyard Project").

Q. What is the purpose of your rejoinder testimony?

A. My testimony responds to certain issues raised by the Office of Consumer Advocate's ("OCA") witnesses in their surrebuttal testimony: (1) OCA Statement 1SR, the surrebuttal testimony of Dr. Felder; and (2) OCA Statement 2SR, the surrebuttal testimony of Mr. Konidena. Specifically, I provide an overview of the Company's rejoinder testimony, respond to the ongoing dispute regarding the scope of this proceeding, and address claims

related to the project's scope and design, and the need for the Tomhicken 230 kV Switchyard Project.

Q. Are you sponsoring any exhibits associated with your rejoinder testimony?

A. No.

II. OVERVIEW OF REJOINDER TESTIMONY

Q. Could you please provide an overview of the rejoinder testimony being submitted by witnesses on behalf of PPL Electric in this proceeding?

A. Yes. Below is a list of the rejoinder testimony being submitted in support of the proposed Tomhicken 230 kV Switchyard Project:

- PPL Electric Statement No. 2-RJ – Kyle Swartzentruber – Mr. Swartzentruber provides rejoinder testimony addressing OCA witness Konidena's claims regarding a "Nescopeck Alternative" to the instant Project.

- PPL Electric Statement No. 5-RJ – John Taylor – Mr. Taylor responds to: (1) OCA witness Felder's surrebuttal testimony regarding issues of resource adequacy and the alleged "policy gap" that OCA claims exists; (2) OCA witness Felder's continued recommendations regarding a large load registry, load curtailment policies, and tariff modifications; (3) OCA witness Felder's and Konidena's claims regarding the scope of this proceeding; (4) OCA witness Konidena's claims regarding allocation and classification of certain facilities and costs; and (5) OCA witness Konidena's claims regarding the benefits of the work contemplated by the letter of notification versus the work contemplated by a separate siting application.

III. REJOINDER REGARDING THE SCOPE OF THE PROCEEDING

Q. Before responding to the specific points raised by OCA witnesses Felder and Konidena regarding the scope of this proceeding, do you have any general comments regarding their surrebuttal testimony?

A. Yes. Both OCA witnesses take issue with the Company's attempt to clarify the scope of the proceeding, on the one hand, and then also preserve its rights by responding to OCA's out of scope testimony and recommendations on the other hand. (*See, e.g.*, OCA St. 1SR, pp. 11-17; OCA St. 2SR, pp. 4-5, 7-8.) I want to emphasize that the Company's testimony should not be understood to indicate agreement with OCA's position on the proper scope of this case, nor should the Company's attempts to respond to the OCA's out-of-scope testimony and recommendations be interpreted as an affirmative request for relief by the Company. Rather, the Company is endeavoring to make its position on the scope of this proceeding clear, while responding to the merits of OCA's testimony where it is clear the OCA disagrees regarding the scope this case and the determinations that must be reached to dispose of the instant Letter of Notification. I am further advised by counsel that appropriate objections and motions regarding the admissibility of testimony may be made in writing in advance of the hearings in this matter.

Q. What is the scope of the Company's requested approvals in this proceeding?

A. The scope of this proceeding involves PPL Electric's request to site and construct a proposed high-voltage ("HV") transmission line under 52 Pa. Code, Ch. 57, Subch. G of the Commission's regulations. The Company is seeking approval to build approximately 1.1 miles of new double-circuit 230 kV transmission tap lines, two new 0.1-mile-long 230 kV connecting lines, to interconnect the new Tomhicken 230 kV Switchyard and a

Customer-owned substation. To that end, the Company is asking the Commission to make the four specific findings and determinations from the Commission set forth in 52 Pa. Code § 57.76(a). The Company is not requesting that the Commission make any finding or determination with respect to the reasonableness or prudency of the transmission costs associated with the Project, nor is it requesting that the Commission make any finding or determination with respect to its proposed allocation of transmission costs between the Customer to be served and PPL Electric's FERC-jurisdictional transmission rate base.

Q. Please summarize OCA witness Felder's surrebuttal testimony regarding PPL Electric's conformity with the Ratepayer Protection Pledge.

A. Mr. Felder testifies that the Ratepayer Protection Pledge requires PPL Electric to demonstrate that the Tomhicken 230 kV Transmission Line Project "completely protects ordinary ratepayers from stranded costs." (OCA St. 1SR, p. 16.) He also testifies that the Company is required to demonstrate that its curtailment policies comply with the Ratepayer Protection Pledge, and that the Company has not demonstrated the same. (OCA St. 1SR, p. 17.) Finally, Mr. Felder recommends that the Reliability Backstop Procurement ("RBP") cost should be assigned in this proceeding, if applicable, in order to satisfy the Ratepayer Protection Pledge. (OCA St. 1SR, p. 20.)

Q. How do you respond to Mr. Felder's testimony that the Company is not in conformance with the Ratepayer Protection Pledge?

A. PPL Electric's signing of the Ratepayer Protection Pledge is an effort from the Company to stay abreast of new and changing policies, and to conform to those policies as it is able

to within the scope of its current legal and regulatory obligations. However, the Company's signing of the Ratepayer Protection Pledge and Mr. Felder's argument that PPL Electric is not in conformance with the same does not change the scope of the instant proceeding, which I address in more detail later in this Section III.

Q. Please summarize OCA witness Konidena's testimony as it relates to the cost allocation of the Project.

A. Mr. Konidena argues that the fact that PPL Electric included a description of costs and cost allocation within its initial filing means that the Company is seeking approval of the same. (OCA St. 2SR, p. 7.) He also renews his arguments that PPL Electric has not justified the cost allocation of the Project, and that the design of the Tomhicken 230 kV Switchyard is interrelated to the cost allocation of the Project. (*See* OCA St. 2SR, pp. 2-3, 8-9.)

Q. Please summarize Ms. Cook's testimony as it relates to the cost allocation of the Project.

A. Ms. Cook asks whether the transmission cost allocation will be addressed or revised within the instant Letter of Notification proceeding. (Cook Surrebuttal, pp. 5-6.)

Q. Is the surrebuttal testimony from OCA's witnesses and Ms. Cook regarding transmission cost allocation relevant to the scope of the instant proceeding?

A. No. As discussed above and in my rebuttal testimony, PPL Electric Statement No. 1-R, the instant proceeding pertains to PPL Electric's request to site and construct a proposed HV transmission line. It does not seek or involve an evaluation of the reasonableness or

prudency of the costs of the Project, or an approval of an allocation of transmission costs between the Customer and other ratepayers.

Mr. Felder's testimony and recommendation pertains to the costs and cost allocation of the project and to broader federal- and utility-level policy. Mr. Konidena and Ms. Cook's testimony also relates to an evaluation of the cost allocation of the Project.

These items are outside of the scope of the instant proceeding, and I maintain my position that it is not appropriate for the instant proceeding to become a referendum on other matters that are subject to FERC jurisdiction or their own, independent Commission review. To reiterate, the Company is not requesting a finding or determination from the Commission as to the reasonableness or prudency of the transmission costs associated with the Project, nor is the Company requesting a finding or determination from the Commission as to the proposed cost allocation between the Customer and PPL Electric's FERC-jurisdictional transmission rate base.

Finally, with respect to OCA witness Konidena's claims that the Commission cannot separate determinations of cost and cost allocation from its determination of need and/or engineering design, Mr. Konidena is simply wrong. Notably, the Commission has done just that when it regularly includes language in its order approving LONs noting that its approval does not address the issues of accounting treatment or cost recovery. (*See* PPL Electric St. No. 1-R, pp. 7-8.) Mr. Konidena never addresses or responds to those orders, which make clear that the Commission not only can separate analyze this issues, but has historically done so on a consistent basis.

IV. PROJECT ENGINEERING AND DESIGN

Q. Mr. Konidena argues that your rebuttal testimony illustrates that the design of the Project and the cost allocation of the Project are "the same inquiry." (OCA St. 2SR, p. 9.) Do you agree with this?

A. No, I do not. The fact that PPL Electric assigned costs based on the parties that would be served by each element of the Project does not reduce the engineering and design of the Project and the cost allocation of the Project to the "same inquiry." Further, I do not agree with Mr. Konidena's statement that the "Commission cannot meaningfully evaluate whether Bay 1's design, bay count, or line terminations are reasonable for siting purposes while treating the cost consequences that PPL's own witnesses derive directly from those same design facts as a separate matter." (OCA St. 2SR, pp. 9-10.) The Commission can meaningfully evaluate the design of the Project separately from the cost allocation of the Project, because the Project design is within the scope of the instant proceeding, while the cost allocation is not.

Indeed, this attempt to conflate Project design with the reasonableness of Project costs or the allocation of those costs is in direct conflict with the Commission's history of approving LONs and including specific language in its orders approving LONs that its approval does not address the issues of accounting treatment or cost recovery. (*See* PPL Electric St. No. 1-R, pp. 7-8.) Mr. Konidena never acknowledges these orders or responds to my testimony regarding them. Moreover, as explained in the rejoinder testimony of PPL Electric witness Mr. Taylor (PPL Electric St. No. 5-RJ), Mr. Konidena ignores that these issues have been separated even in the more recent HV line siting proceedings cited by OCA witness Mr. Felder, where the Commission's orders include the exact same language I note above and noted in my rebuttal testimony.

Q. Mr. Konidena disputes the number of bays in the Tomhicken 230 kV Switchyard. Can you please provide clarification on this matter?

A. Certainly. Mr. Konidena stated in his direct testimony that the Tomhicken 230 kV Switchyard has five bays, and stated in his surrebuttal testimony that the eight-bay figure to which I testified does not reconcile with his five-bay figure. This misunderstanding appears to have come about due to Mr. Konidena's mistaken reliance upon the "Responsibility of Asset Matrix" example applicable to a breaker and a half ("BAAH") configuration that is set forth in the Company's Policy on Cost Allocation for Large Customer Interconnections that was provided in discovery as OCA I-6, Attachment 1.

This document was provided in response to a discovery request from OCA that sought a description of the methodology used to quantify or evaluate the benefits to ratepayers that justified allocation of certain equipment and facilities to transmission rate base. The Company explained that it "applied its policy attached as OCA I-6 Attachment 1," and provided this document. Importantly, the "Responsibility of Asset Matrix" included in the Company's Policy on Cost Allocation for Large Customer Interconnections that was provided in discovery as OCA I-6, Attachment 1 clearly states that it is an "example" that is provided for ease of understanding at the highest level. However, the Company also supplied OCA I-6, HIGHLY CONFIDENTIAL Attachment 2, which provided description of major asset(s) involved in the Tomhicken Switchyard Project, a justification for those assets, and an identification of whether those assets would be recovered via transmission rate base or a customer contribution.

Despite having this information, Mr. Konidena relies upon the "Responsibility of Asset Matrix" example and, in particular, the BAAH configuration example with five bays provided in that example, as if this example is intended to specifically illustrate the configuration of the Tomhicken Switchyard, and how the Company determined to allocate the costs of the equipment and facilities of the Switchyard between the Customer and transmission rate base. (OCA St. 2SR, p. 15.) That is simply not accurate.

As I explained in my rebuttal testimony, the Company applied the methodology set forth in the Matrix to the actual arrangement of the Tomhicken Switchyard (which is described in detail in OCA I-6, HIGHLY CONFIDENTIAL Attachment 2, and not to the illustrative arrangement provided in response to OCA I-6. (PPL Electric Statement No. 1-R, pp. 22-23.) Finally, in response to that same discovery request, PPL Electric did provide "Tomhicken-specific documentation" in the form of the actual quantitative analysis and supporting calculations it performed in determining the cost allocation of the Tomhicken 230 kV Switchyard.[1] (OCA St. 2SR, p. 27.)

Q. Please summarize Mr. Konidena's testimony that there is a "discrepancy" between the Company's testimony and discovery responses concerning the lines that will interconnect to the Tomhicken 230 kV Switchyard, and reconcile the discrepancy.

A. Mr. Konidena testifies that PPL Electric's discovery response[2] confirms that eight lines will be installed at the Tomhicken 230 kV Switchyard as a part of Phase 1, which is this proceeding. (OCA St. 2SR, p. 16.) However, in my direct testimony, PPL Electric Statement No. 1, the description of the scope of Phase 1 is "four double-circuit, 230 kV

[1] PPL Response to OCA I-6, Attachment 2 (**HIGHLY CONFIDENTIAL**).
[2] PPL Response to OCA XIV-4(a), (b), (d).

transmission Tap Lines," and "two new 0.1-mile-long 230 kV Connecting Lines." (PPL Electric St. No. 1, p. 8.) The Company also stated in Attachment 1 – Necessity Statement that the two new 0.1-mile-long 230 kV Connecting Lines are double-circuit lines. (*see* Attachment 1 – Necessity Statement, p. 1-7 and Figure 1-2.)

To be clear, the Tomhicken Switchyard Project, i.e., Phase 1, only involves the siting and construction of the lines described above, i.e., "four double-circuit, 230 kV transmission Tap Lines," and "two new 0.1-mile-long 230 kV Connecting Lines." The Tomhicken Switchyard itself will be designed to accommodate a total of nine transmission lines that will be terminated at the switchyard after the Sugarloaf Project, i.e., Phase 2, is completed. There is no discrepancy regarding the number of lines that will interconnect to the Tomhicken Switchyard. Rather, it appears that Mr. Konidena is confusing the total number of lines that the Tomhicken Switchyard is designed to accommodate, which accounts for both Phase 1 and Phase 2, with the number of lines that are in scope of this letter of notification which is limited to Phase 1.

Q. Mr. Konidena asserts that, because four of the eight interconnecting transmission lines to the Tomhicken 230 kV Switchyard are "dedicated to the Customer," 50% of the costs of the Project would thus correspond to the Customer's share of the lines. (OCA St. 2SR, p. 17.) Do you agree?

A. No. This ignores the fact that the costs of the Connecting Lines have been allocated solely to the Customer. The fact that these lines have been allocated to the Customer has no bearing on how the total Project costs should be allocated, and ignores that they have been allocated to the Customer based upon their specific function. This is consistent with the

process PPL Electric uses to determine cost responsibility that was discussed in my rebuttal testimony.

Q. Please respond to Mr. Konidena's continued dispute of the BAAH design of the Tomhicken 230 kV Switchyard, including the claims that the BAAH design is not quantitatively supported. (OCA St. 2SR, pp. 18, 20.)

A. First, I would note that Mr. Konidena still concedes, as I stated in my rebuttal testimony, that the BAAH design provides greater operational reliability than a ring bus or other configuration. (OCA St. 2SR, p. 21.) Second, PPL Electric's selection of the BAAH design is pursuant to PPL Electric's design standards, which have not been challenged or questioned thus far in this proceeding. The Company's design standards are not specific to the Tomhicken 230 kV Switchyard Project. The design of the Project is based upon the Company's evaluation of the design and configurations of the facilities, and how best to maintain and improve the safety and reliability of its system.

Q. Do you wish to respond to Mr. Konidena's assertion that the selection of a BAAH design is independent of the size, construction, and configuration of the switchyard? (OCA St. 2SR, pp. 21-22.)

A. I do not disagree with Mr. Konidena's assertion, because the selection of this design was done pursuant to the Company's engineering and design standards. As discussed above, these standards have not been questioned or challenged in this proceeding.

Q. Do you agree with Mr. Konidena's assertion that PPL Electric's classification of Bay 1's second function as a network source is an "unreviewed, after-the-fact application" of PPL Electric's Policy on Cost Allocation? (OCA St. 2SR, pp. 28-29.)

A. I do not, because that is not an accurate assertion. PPL Electric's classification of Bay 1's function as a network source was not an after-the-fact application of the Company's Policy on Cost Allocation. The Company explained in its response to OCA I-6(c) that the Tomhicken 230 kV Switchyard will provide network benefits, as it will be part of the overall 230 kV network and will see network flow.

Q. Please explain the derivation of the cost allocation of $3.99 million to the Customer and $1.7 million to transmission rate base for Bay 1.

A. The $3.99 million is associated with the specific facilities and equipment required to interconnect the Customer with the Tomhicken Switchyard, which functionally only serve the Customer. This includes, for example, bus equipment, circuit breakers, motor operated disconnects, coupling capacitor voltage transformers ("CCVTs"), and the line and control relays associated with the customer control equipment. The $1.7 million is associated with the specific facilities and equipment that interconnect the Tomhicken Switchyard with the transmission grid, and provide network benefits. This includes similar equipment and facilities as what I described to interconnect the customer, but those facilities do not function solely to provide service to the Customer.

Q. Is Mr. Konidena's speculation that the "Function 1/Function 2" framework was constructed in rebuttal testimony to explain PPL Electric's cost allocation accurate? (OCA St. 2SR, p. 31.)

A. No, this is not an accurate speculation from Mr. Konidena. While the precise terms regarding function may not be explicitly used within the Policy on Cost Allocation, PPL Electric's use of those terms was an attempt in rebuttal testimony to clarify OCA's apparent misunderstanding regarding the Company's use of the Responsibility of Asset Matrix. These terms are not a framework that was fabricated in rebuttal testimony as an after-the-fact attempt to clarify the Company's cost allocation determinations. Rather, the use of those terms was an attempt to further clarify the Company's previously-provided descriptions regarding its cost allocation determinations, in light of a misunderstanding of that process, which appears in Mr. Konidena's testimony.

Q. Please respond to Mr. Konidena's assertion that the logic used to apply the Policy on Cost Allocation for Large Customer Interconnections to the Susquehanna Project does not produce the allocation PPL Electric is proposing when applied to the Tomhicken 230 kV Switchyard Project. (OCA St. 2SR, pp. 46-48.)

A. This assertion is not accurate. Further, this appears to be an attempt by Mr. Konidena to post-hoc apply the Company's Policy on Cost Allocation to the Susquehanna Project, without any information as to how the Policy was in fact applied in that case. The information provided in this proceeding has pertained to the application of the Policy on Cost Allocation to the instant Tomhicken 230 kV Switchyard Project, and not to the application of that Policy in other siting proceedings. OCA has no ability to opine on the

application of the Policy to the Susquehanna Project without more specific facts. Moreover, the Final Order in that case cannot be relied upon as a source on cost allocation, because the Commission noted that its approval of the project did not address the issues of accounting treatment or cost recovery.

V. NECESSITY OF THE PROJECT

Q. OCA witness Konidena testifies that there is an evidentiary "gap" in that the Company has not provided a quantitative analysis of the benefits of the Tomhicken 230 kV Switchyard Project. (OCA St. 2SR, p. 12.) How do you respond to this assertion?

A. I would disagree. The quantitative effects of the Project were discussed by PPL Electric witness Johnson in her rebuttal testimony. (*See*, PPL Electric St. No. 6-R, pp. 10-13.) To briefly summarize: the Company expects data centers to have little to no impact on its distribution system or distribution rates, because those entities do not utilize the distribution system. In addition, while data centers will have an impact on the transmission system and transmission rates, Ms. Johnson demonstrated through an application of PPL Electric's Network Service Rate that residential customers may in fact see a decrease in the transmission service charge portion of their bill, which can contribute to an offset of any increases in the generation charge, which PPL Electric his little to no control over. (PPL Electric St. No. 6-R, pp. 11-12.)

Q. Please respond to Mr. Konidena's assertion that transmission facility design should start with the question of "when an actual need has been demonstrated to the existing facility, and whether cost-effective non-transmission alternatives were considered, before a transmission solution sized beyond that demonstrated need is selected and its cost assigned to ratepayers." (OCA St. 2SR, p. 23.)

A. The Company has already demonstrated in this proceeding that it did consider non-transmission alternatives ("NTA"), and determined that these were not reasonable or feasible to address the need for the instant Project. (PPL Electric St. No. 2-R, pp. 4-5.) Specifically, PPL Electric considered Non-Transmission Alternatives ("NTA"), Dynamic Line Ratings ("DLR"), and distribution system connection, but determined that none of those alternatives were viable because of the physical interconnection requirement, size of the load, and Transmission Planning load flow analysis. (PPL Electric St. No. 2-R, pp. 4-5.) Mr. Konidena conceded this point in his direct testimony, and has provided no explanation for his new pivot on this position. (OCA St. 2, pp. 33-34, 36, 38.)

Q. Mr. Konidena renews his argument that the Tomhicken 230 kV Switchyard will not provide sufficient network benefits to justify the proposed cost allocation. Did you address this issue in your rebuttal testimony? (OCA St. 2SR, pp. 34-35.)

A. Yes, I address this issue in pages 20-22 of my rebuttal testimony. I will not restate these arguments here, but also note, as I did in my rebuttal and above, that the Company has not proposed Commission review or approval of the cost allocation of the Project costs in this case. Thus, it maintains that this issue is not within the scope of this proceeding.

VI. CONCLUSION

Q. Does this conclude your rejoinder testimony at this time?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 2-RJ

REJOINDER TESTIMONY OF KYLE SWARTZENTRUBER

TOPICS ADDRESSED: ENGINEERING AND DESIGN

DATE: SEPTEMBER 14, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Kyle Swartzentruber, and my business address is 827 Hausman Road, Allentown, Pennsylvania 18104.

Q. Did you previously submit testimony in this proceeding on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company")?

A. Yes. On May 13, 2026 I submitted my direct testimony, PPL Electric Statement No. 2, and on August 7, 2026, I submitted my rebuttal testimony, PPL Electric Statement No. 2-R, in connection with the "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 Needed to Connect the Existing Susquehanna-Harwood #1 and #2 Transmission Lines to the New Tomhicken 230 kV Switchyard, All Located in Luzerne County, Pennsylvania," at Docket No. A-2025-3059443 (the "Tomhicken 230 kV Switchyard Project").

Q. What is the purpose of your rejoinder testimony?

A. My testimony responds to certain issues raised by one of the Office of Consumer Advocate's ("OCA") witnesses in his surrebuttal testimony, specifically, OCA Statement 2SR, the surrebuttal testimony of Mr. Konidena. Specifically, I will respond to Mr. Konidena's testimony as it relates to the Company's evaluation of the OCA's proposed Nescopeck Alternative.

Q. Are you sponsoring any exhibits associated with your rejoinder testimony?

A. No.

II. ENGINEERING AND DESIGN

Q. Please respond to OCA witness Konidena's testimony that the Company did not consider the Nescopeck Alternative from an appropriately quantitative level. (OCA St. 3SR, pp. 41-44.)

A. It is unreasonable for PPL Electric to evaluate a 9 mile, greenfield transmission line route, when a 1.1 mile transmission line route is available that is entirely encompassed on the Company's preexisting right-of-way, on land acquired from the Customer, or on the requesting Customer's property. The chosen route will result in impact to the least amount of variables in that transmission line route, and will consist of the minimum amount of structures necessary to achieve the Customer's need. With a longer line route section, there would be more impacts to every facet of a transmission line project. Additionally, I am advised by counsel that the mere existence of an alternative route does not invalidate the utility's route. The fact that OCA has proposed such an alternative route does not require the Company to evaluate the route from every possible quantitative and/or qualitative perspective.

Q. Do you agree with Mr. Konidena that PPL Electric has not provided "some basis for comparing" the costs and benefits of an alternative?

A. No, I do not. As I explained in my rebuttal testimony, a direct evaluation of the costs of the Nescopeck Alternative was not warranted in the first place because the engineering and

design considerations alone are sufficient to warrant rejection of that alternative as unreasonable. (PPL Electric St. No. 2-R, pp. 5-7.)

III. CONCLUSION

Q. Does this conclude your rejoinder testimony at this time?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

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 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	:	Docket No. A-2025-3059443

PPL ELECTRIC UTILITIES CORPORATION

STATEMENT NO. 5-RJ

REJOINDER TESTIMONY OF JOHN D. TAYLOR

TOPICS ADDRESSED:
FERC AND COMMISSION JURISDICTION
RESOURCE ADEQUACY
PPL'S REQUEST FOR APPROVAL AND SCOPE
CUSTOMER-SPECIFIC INVESTMENTS
PROJECT PHASE CONSIDERATIONS
TARIFF PROTECTIONS

DATE: SEPTEMBER 14, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is John D. Taylor, and my business address is 10 Hospital Center Commons, Suite 400, Hilton Head Island, South Carolina 29926.

Q. Did you previously submit testimony in this proceeding on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company")?

A. Yes. On August 7, 2026, I submitted my rebuttal testimony, PPL Electric Statement No. 5-R, which responded to certain policy issues raised by Office of Consumer Advocate ("OCA") Witnesses Felder and Konidena related to the "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" at Docket No. A-2025-3059443 ("Tomhicken 230 kV Switchyard Project" or the "Project").

Q. Are you sponsoring any exhibits associated with your rejoinder testimony?

A. No.

II. PURPOSE AND SCOPE OF TESTIMONY

Q. What is the purpose of your rejoinder testimony?

A. My rejoinder testimony responds to certain policy issues raised by OCA witnesses Felder and Konidena related to the Letter of Notification ("LON") filing. My rejoinder testimony is arranged as follows:

- Section I – Resource Adequacy, Reliability Backstop Proposal ("RBP"), Interim Resource Adequacy Service ("IRAS") and the alleged "policy gap."
- Section II – Large Load Registry, Load Curtailment, Tariff protections, and Stranded cost.
- Section III – PPL's Request for Approval and the Scope of this LON Filing.
- Section IV – Customer-Triggered vs. Customer Specific Facilities.
- Section V – Phase 1 and 2 Considerations.
- Section VI – Conclusion.

Q. Does it remain your position that certain of these issues are outside the scope of this Letter of Notification proceeding?

A. Yes. In their surrebuttal testimony, Witness Felder and Witness Konidena continue to ask the Public Utility Commission ("Commission") to make determinations that are outside the scope of this proceeding, which concerns the siting and location of high voltage transmission lines under the streamlined Letter of Notification ("LON") process outlined in Section 57.72 of the Commission's regulations.

Q. Does the fact that you are providing testimony responding to the out-of-scope arguments made by OCA Witnesses Felder and Konidena mean that you believe or concede those issues are properly before the Commission for consideration in this proceeding?

A. No. As I explained in my rebuttal testimony, my response to issues raised by OCA Witnesses Felder and Konidena should not be interpreted as an acknowledgment that those issues are properly before the Commission in this proceeding. Rather, my testimony is intended to respond to arguments that OCA has advanced in support of its recommendations regarding the Project. I am further advised by counsel that appropriate objections and motions regarding the admissibility of testimony may be made in writing in advance of the hearings in this matter.

Q. Considering the ongoing dispute regarding the appropriate scope of the Commission's review of this LON, what is the purpose of your rejoinder testimony?

A. Like my rebuttal testimony, the purpose of my rejoinder testimony is not to expand the scope of this proceeding or request approval of cost recovery or cost allocation. Rather, it is to respond to arguments presented by OCA Witnesses Felder and Konidena. My testimony does not ask the Commission to resolve issues that are beyond the scope of this LON. It explains why certain OCA recommendations are unnecessary for the Commission to determine whether the specific high voltage ("HV") transmission lines proposed in this LON satisfy the applicable siting requirements, and why many of the broader policy and cost-allocation issues raised by OCA should be addressed, if at all, through existing regulatory processes that are designed for these issues.

Q. Would approval of this LON prevent OCA or other interested parties from continuing to pursue the broader cost-allocation, resource-adequacy, or large-load policy issues that OCA has raised?

A. No. That is an important distinction. Approval of this LON would not prevent OCA from pursuing, or the Commission, PJM Interconnection, LLC ("PJM"), and the Federal Energy Regulatory Commission ("FERC") from considering future changes related to transmission cost allocation, cost recovery, resource adequacy, or large-load policy through the proceedings established to address those issues.

For example, if OCA believes that transmission costs associated with the Project are ultimately classified or allocated improperly, approval of this LON would not determine that issue or prevent OCA from pursuing the remedies available through the applicable FERC processes. Similarly, approval of this LON would not prevent PJM, FERC, or the Commission from adopting future requirements concerning resource adequacy, capacity-cost responsibility, curtailment, registries, or other large-load policies. Accordingly, the Commission does not need to resolve those broader issues in this LON in order to preserve OCA's ability to raise them or regulators' ability to address them in the appropriate proceedings.

III. RESOURCE ADEQUACY, RELIABILITY BACKSTOP PROPOSAL ("RBP"), INTERIM RESOURCE ADEQUACY SERVICE ("IRAS"), AND THE ALLEGED "POLICY GAP"

Q. Witness Felder continues to argue that the Commission should use this proceeding as an opportunity to fill a "policy gap" for large load tariff issues and cites recent events in support, including Chairman Stephen DeFrank's Statement made at Docket No. A-2026-3062201 on August 6, 2026, Governor Shapiro's Executive Order No. 2026-05 issued on August 18, 2026, and active proceedings before FERC initiated by PJM.[1] Do these recent activities reveal any "policy gap" requiring Commission intervention, as Witness Felder argues?

A. No. While the recent events highlighted by Witness Felder show that the large load policy is evolving, they do not establish that there is a policy gap that must be filled by the Commission in this LON proceeding. Chairman DeFrank's comments in the recent LON proceeding cited by Witness Felder that further work lies ahead on cost allocation confirms that policy developments continue, but they do not establish that there is a policy gap or a regulatory gap that needs to be filled in this LON proceeding.[2] There is already a forum in place as part of the FERC formula rate process where transmission cost allocation issues can be raised. State-level initiatives on allocating transmission costs use the FERC process as an input, and there is a clear distinction between these two jurisdictions. Governor Shapiro also highlights the ongoing FERC processes that will act as inputs to state-level implementation efforts. These comments support the conclusion that there is no policy or

[1] OCA St. 1SR, pp. 5-6.

[2] Moreover, I note that the Order entered at Docket No. A-2026-3063643 contained the exact same language I, and PPL Electric witness Lookup, referenced in our respective rebuttal testimonies, where the Commission made clear that its approval to site and construct the contemplated HV transmission lines does not address the issues of accounting treatment, and cost recovery, i.e., issues of cost or allocation of costs between a customer and rate base.

regulatory gap, that the roles at the state and federal levels are well defined, and that state commissions will continue to implement ongoing federal initiatives expeditiously. These comments do not support changing the current framework in a specific LON proceeding (that is limited in scope to specified HV transmission lines that a single utility has sought approval to site and construct) prior to broader state-level proceedings on implementing FERC initiatives. This LON should review the specific HV transmission lines that PPL Electric has proposed to cite and constructed based on the law and regulatory framework as it exists today.

Q. Have the statements, policies, and proceedings cited by OCA Witness Felder changed the FERC-regulated transmission ratemaking processes outlined in your rebuttal testimony?

A. No. The FERC-regulated transmission ratemaking process that exists today as outlined in my rebuttal testimony has not changed in response to the statements, policies and proceedings cited by Witness Felder. Comments by Chairman Stephen DeFrank and Governor Shapiro point to continued work to align state processes with ongoing FERC and PJM initiatives however the existing FERC processes remain unchanged until ongoing FERC proceedings are concluded.

Q. OCA Witness Felder acknowledges that PJM has initiated proceedings at FERC related to Reliability Backstop Procurement ("RBP"), Interim Resource Adequacy Service ("IRAS"), and Large Load Registry and that those proceedings are ongoing, but claims that "the key takeaway" from these proceedings "is that Pennsylvania needs to act now to protect ordinary ratepayers from reduced reliability and shifting costs, regardless of what FERC approves."[3] Do you agree?

A. No, I do not agree. Witness Felder's argument that the Commission should act regardless of what FERC approves ignores the importance of close coordination and alignment between state-level and federal-level initiatives. Where state regulators have a role in implementing federal initiatives, close alignment is required to ensure implementation does not create conflicting signals or run counter to FERC-approved initiatives. If the Commission proceeds to implement PJM-proposed programs without considering how to align them with ongoing FERC proceedings, it could create requirements that are inconsistent with or duplicative of, or possibly conflict with, FERC policy and rules.

Q. Do you agree with Witness Felder's conclusion that PJM's RBP, IRAS, and Large Load proposals are relevant to this proceeding because implementing these proposals would "require state action by the Commission and electric distribution utilities" in the context of this LON proceeding?[4]

A. No, I do not agree. A specific LON proceeding like this one is not the appropriate forum to debate the statewide implementation of ongoing FERC initiatives. While PJM's RBP, IRAS, and Large Load proposals will require state-level action to implement these

[3] OCA St. 1SR, pp. 8-9.
[4] OCA St. 1SR, p. 11.

programs, this does not mean that the Commission should take actions in this LON proceeding, that would violate state/federal jurisdictional lines or create misalignment between the Federal initiatives and the state-level implementation of those initiatives. I further note that the Commission has recently confirmed it is taking certain actions to address these issues on a statewide basis, and that a Tentative Order (regarding RBP and IRAS) and technical conference (regarding cost large load cost allocation) process will be occur this fall.[5] This action further suggests that this LON proceeding—that addresses specific HV transmission lines to be sited and constructed by a single utility—is not the proper proceeding to resolve these issues.

Q. Do you agree with Witness Felder's claims that PPL Electric has not disputed his testimony stating that "interconnecting large loads without the protections [he] recommend[s] reduces resource adequacy and may raise costs for ordinary ratepayers" and that PPL Electric is "taking actions that reduce reliability and potentially raise customer costs"?[6]

A. No. I do not agree that PPL Electric has failed to dispute these claims. As explained in my rebuttal testimony, PPL Electric has implemented protections through Rate Schedule LP-6 and the Electric Service Agreement with the Customer to address stranded-cost risk and protect other customers if the Customer's projected load does not materialize as anticipated.[7] Witness Felder does not identify evidence specific to the Tomhicken Project

[5] *See* Motion Directing Staff to Issue Tentative Order Pursuant to the Public Utility Commission's Provisions at 52 Pa. Code Section 57.52 (Emergency load control and energy conservation by electric utilities) and Establish a Technical Conference On Large Computational Load Cost Allocation, Public Meeting of September 10, 2026, 3064961-CMR (Motion of Vice Chair Barrow).

[6] OCA St. 1SR, p. 12.

[7] PPL Electric St. 5-R, pp 45-46.

demonstrating that there is inadequate generation or supply to serve the Customer, that interconnecting the Customer will reduce reliability, or that approval of this LON will increase costs for ordinary ratepayers. By contrast, PPL Electric has presented analysis demonstrating that the interconnection is expected to lower transmission rates, and Witness Felder has not disputed that analysis. His broad policy concerns about large load growth do not establish that PPL Electric is taking actions in this proceeding that reduce reliability or improperly shift costs to other customers.

Q. Witness Felder also claims that PPL Electric and other electric distribution companies ("EDCs") in Pennsylvania have an affirmative duty under Section 2807 of the Competition Act to ensure there is "sufficient supply" to serve large load customers prior to interconnection.[8] Please respond.

A. Witness Felder's interpretation of Section 2807 of the Competition Act presents a legal issue that I understand will be addressed in briefs. From the perspective of my testimony, I addressed PPL Electric's role as a transmission owner in planning, constructing, and operating transmission facilities in a manner consistent with applicable reliability obligations. I did not discuss the limitations on EDCs contained in the Competition Act specifically.

[8] OCA St. 1SR, pp. 12-13.

Q. To the extent that the Commission agrees with OCA's position that "policy gaps" exist regarding large load interconnections, has Witness Felder provided the Commission with a clear road map of how the Commission could appropriately fill those gaps?

A. No. Even if the Commission were to conclude that additional policy development is warranted for large load interconnections, Witness Felder has not provided a clear road map for how the Commission could appropriately fill those gaps in this individual LON proceeding. His recommendations are premature because the federal and regional processes he relies upon remain ongoing, and any state-level implementation should occur through an appropriate regulatory process that allows the Commission to consider generally applicable rules, jurisdictional limits, stakeholder input, and coordination with final FERC and PJM outcomes. As discussed above, approval of this LON would not prevent OCA, the Commission, PJM, or FERC from continuing to consider large-load cost allocation, resource adequacy, reliability, or curtailment issues, nor would it prevent the Commission or FERC from adopting future changes through the proceedings established to address those matters.

Witness Felder's testimony is also internally inconsistent. He argues that the Commission must act now regardless of what FERC approves, while also suggesting that the Commission should fill in gaps left by those same federal and regional initiatives. He does not explain how the Commission could impose new requirements on PPL Electric in this proceeding without risking duplication of, or inconsistency with, the final resolution of the pending FERC and PJM proceedings. For those reasons, his testimony does not

provide a sound basis for imposing new large load interconnection policies as a condition of approval in this project-specific LON proceeding.

IV. LARGE LOAD REGISTRY, LOAD CURTAILMENT, TARIFF PROTECTIONS AND STRANDED COSTS

Q. How do you respond to Witness Felder's statement that implementing a PPL Electric-specific large load registry is not premature or duplicative?[9]

A. PPL Electric should provide accurate and timely information required for any PJM-approved Large Load Registry. However, I continue to believe it would be inappropriate to require a separate registry as a condition of this individual LON. As I discussed in my rebuttal testimony, PJM has proposed a large load registry.[10] Large load planning, forecasting, and reliability concerns are regional issues that would be more appropriately addressed through a coordinated PJM process than through project-specific conditions imposed in individual siting proceedings where a specific utility seeks to site and construct specific HV transmission line(s). Accordingly, I continue to believe that creating a separate registry requirement through this LON would be duplicative and unnecessary.

Q. Do you agree with Witness Felder's statement that PPL Electric's load curtailment policies do not comply with the Ratepayer Protection Pledge and are at odds with PJM's proposed IRAS[11]?

A. No. Witness Felder does not recognize that FERC has a role in determining curtailment policies, which are currently being developed through PJM's ongoing IRAS initiative.

[9] OCA St. 1SR, p. 19.
[10] PPL Electric St. 5-R, p. 13.
[11] OCA St. 1SR, pp 17-18.

Given that this is an ongoing initiative, it is important that the Commission aligns its framework with the FERC proceedings on this matter to ensure federal/state alignment. PJM and FERC are responsible for establishing the regional wholesale and reliability framework, including the circumstances under which IRAS load reductions may be called and how the service interacts with regional reliability operations. The Commission and EDCs would then implement the approved framework through state-sanctioned load-reduction plans, retail tariffs, and utility operating procedures. Witness Felder's own description of IRAS recognizes this structure.[12] As noted above, the Commission is already taking steps to address IRAS on a statewide basis,[13] which further suggests that this proceeding is not the best (or appropriate) place to resolve these issues, and that the Commission understands that any curtailment rules must be operationally integrated with PJM instructions, PPL Electric's emergency load-control procedures, applicable Commission regulations, customer metering and communications capabilities, treatment of critical load, notice requirements, and enforcement provisions.

Q. Please respond to Witness Felder's comparison of the Tomhicken LON to a recently approved LON filed by Mid-Atlantic Interstate Transmission, LLC ("MAIT").[14]

A. Witness Felder's comparison to the MAIT LON does not support imposing the additional conditions he recommends here. The MAIT proceeding involved a different project and a different factual record, and neither the Commission nor the utility imposed a requirement

[12] OCA St. 1SR, pp. 10-12.

[13] *See* Motion Directing Staff to Issue Tentative Order Pursuant to the Public Utility Commission's Provisions at 52 Pa. Code Section 57.52 (Emergency load control and energy conservation by electric utilities) and Establish a Technical Conference On Large Computational Load Cost Allocation, Public Meeting of September 10, 2026, 3064961-CMR (Motion of Vice Chair Barrow). Docket No. M-2026-3064961 is the docket opened for these matters.

[14] OCA St. 1 SR, pp. 13-14.

that the interconnecting load bring its own generation as a condition of LON approval. In addition, the Commission's approval of the MAIT LON included the same type of limitation discussed in my rebuttal testimony: approval of the LON did not resolve issues of accounting treatment or cost recovery. That limitation reinforces, rather than undermines, the point that an LON proceeding is not the forum for resolving broader resource adequacy, transmission cost allocation, or rate recovery issues.

Q. Witness Felder criticizes your testimony for not guaranteeing that "that ordinary ratepayers are protected from stranded costs under all circumstances" and states that you did "not testify that if the Customer's projected load does not materialize, even given the provisions of LP-6, ordinary ratepayers would not pay for stranded costs."[15] Do these statements fairly characterize your testimony or the protections that PPL Electric has in place to protect customers from stranded costs?

A. No. Witness Felder's statements do not fairly characterize my testimony or the protections PPL Electric has in place. My rebuttal testimony did not offer an absolute guarantee against stranded costs under every conceivable circumstance. Rather, it explained that PPL Electric has adopted specific protections through Rate Schedule LP-6 (that were approved by the Commission) and the Electric Service Agreement ("ESA") with the Customer to address the risk that the Customer's projected load does not materialize as anticipated. Witness Felder continues to address those protections only in passing and does not meaningfully engage with the actual provisions of Rate Schedule LP-6 or the ESA. Those provisions are designed to protect other customers by requiring the Customer to make commitments and

[15] OCA St. 1SR, p. 16.

payments tied to its requested service and committed load. Witness Felder's criticism therefore focuses on the absence of an unconditional guarantee, rather than on whether the protections PPL Electric actually implemented are reasonable and appropriate for this Project.

Q. Witness Felder criticizes the Company for not incorporating the "but for" test for cost allocation from its Model Large Load Tariff into its Rate Schedule LP-6.[16] Did the Commission require the utilities to apply the "but for" test as a condition for approval of any of the other LONs referenced in OCA Statement 1SR?

A. No. Importantly, the Commission's Order regarding the Model Large Load Tariff stated that it set forth "the Commission's guidelines for a model large load tariff."[17] Neither this Order, nor any other Order resolving the above-referenced LON proceedings required the imposition of the "but for" cost-allocation concept.

V. PPL'S REQUEST FOR APPROVAL AND SCOPE OF THE LON FILING

Q. OCA Witness Konidena states that he did not testify that PPL Electric is asking the Commission to approve transmission costs in this proceeding.[18] How do you understand his position?

A. I accept Witness Konidena's clarification that he is not asserting that PPL Electric has formally requested Commission approval of transmission rates in this proceeding. My concern remains with the remedy he proposes. He asks the Commission to condition this

[16] OCA St. 1SR, p. 20.
[17] Final Order By The Commission, Interconnection and Tariffs for Large Load Customers, Public Meeting of April 30,2026, Docket No. M-2025-3054271.
[18] OCA St. 2SR, pp. 4-5.

LON approval on determinations concerning the anticipated classification and allocation of transmission costs. PPL Electric has not requested those determinations in this proceeding. As explained in my rebuttal and rejoinder testimony, the appropriate allocation and recovery of any such costs can be addressed in the proceeding in which recovery is actually sought. Accordingly, Witness Konidena's proposed cost-allocation requirements go beyond the issues that need to be decided in this LON proceeding.

The question before the Commission remains whether the specific HV transmission lines proposed in this LON satisfy the applicable siting and construction requirements, which do not include a finding, determination, or referendum on costs, cost allocation, or cost recovery. The final allocation, recovery, and treatment of transmission costs remain appropriately reviewed and addressed through the FERC rate-setting process.

Q. Witness Konidena testifies that he is not asking the Commission to "set FERC jurisdictional rates," and instead that his recommendation is that the Commission should review the Company's cost allocation policy for FERC-regulated transmission rates, and then "assess the reasonableness of the policy as applied to this project".[19] Does this explanation address the concerns you raised in Rebuttal regarding the appropriate scope of this proceeding?

A. Whether Witness Konidena's recommendation is framed as approval of a specific allocation or approval of the methodology used to develop that allocation, it would require the Commission to review issues concerning the classification and allocation of transmission costs. Those issues extend beyond the relief requested in this LON. The

[19] OCA St. 2SR, p. 2.

Company is seeking approval to construct the specific HV transmission lines identified in its filing, not approval of a cost allocation methodology or the ultimate cost recovery of the associated Project costs.

Q. Witness Konidena argues that PPL Electric placed cost allocation at issue by including cost information in the LON and by responding to OCA's criticisms of the Company's anticipated cost treatment.[20] Do you agree?

A. Those are legal matters that I understand will be addressed by PPL Electric in briefs. My testimony is limited to explaining why, from a regulatory and policy perspective, the issues raised by Witness Konidena are not necessary for the Commission to decide on within this LON.

My rebuttal and rejoinder testimony are intended to address arguments raised by OCA in their testimony. They are not intended as a request for Commission approval of a cost allocation methodology or policy, or for the ultimate recovery of the associated Project costs.

Q. Witness Konidena recommends that the Commission require PPL Electric to develop a retroactive cost recovery mechanism under which future large-load customers interconnecting through or benefitting from Tomhicken infrastructure contribute to costs currently allocated to ratepayers.[21] Please respond to this recommendation.

A. I do not agree with that recommendation. Importantly, the Company has not requested approval of a cost recovery mechanism as part of this LON. Witness Konidena's proposal

[20] OCA St. 2SR, pp. 6-8.
[21] OCA St. 2SR, p. 51.

would require the Commission to establish an unidentified and unsupported mechanism to identify future customers, determine the extent to which they benefit from the Project, and reallocate Project costs among current and future customers. Those issues concern the future allocation and recovery of transmission costs, which are more appropriately addressed the FERC-regulated transmission ratemaking and cost allocation processes rather than through a project-specific condition imposed in this LON proceeding. If future circumstances warrant changes to cost allocation or cost recovery approaches, those issues can be addressed through those existing processes without requiring the Commission to resolve them as part of this LON proceeding.

VI. CUSTOMER-TRIGGERED VERSUS CUSTOMER-SPECIFIC FACILITIES

Q. Witness Konidena argues that the distinction between "customer-triggered" and "customer-specific" facilities is not reflected in PPL Electric's Cost Allocation Policy and was developed after the allocation methodology had already been determined.[22] How do you respond?

A. The terms "customer-triggered" and "customer-specific" were used in my rebuttal testimony to distinguish between why a project is undertaken and how individual facilities function within the transmission system, in order to respond to OCA's framing of the issues in this case. The terminology was intended to describe that distinction and provide context for the Project, not to establish or apply a new cost allocation methodology. Regardless of the labels used, the underlying point remains. A customer request that initiates a project

[22] OCA St. 2SR, pp. 32-34.

does not, by itself, determine the purpose or function of every facility included in that project.

Q. Witness Konidena continues to rely on the Susquehanna 230 kV and 500 kV Transmission Line Project as a comparator and argues that the difference between the customer allocation in that project and the anticipated allocation for Tomhicken shows that PPL Electric's approach is inconsistent.[23] Does that comparison change your opinion?

A. No. As I explained in my rebuttal testimony, the Susquehanna project does not provide a fixed benchmark for the Tomhicken Project. PPL Electric does not apply a uniform customer-allocation percentage across all large-load projects. Instead, each project is evaluated based on the specific facilities being constructed, their function, and whether those facilities are dedicated to the interconnecting customer or become part of the integrated transmission system. The fact that another project resulted in a different anticipated allocation does not establish that the Tomhicken allocation is unreasonable or inconsistent. It reflects that the projects involve different facilities, configurations, functions, and circumstances. In addition, the Commission's approval of the Susquehanna LON did not determine cost recovery or cost allocation. That same limitation applies here and reinforces that the Susquehanna comparison does not provide a basis to convert this LON into a transmission cost-allocation proceeding.

[23] OCA St. 2SR, pp. 45-51.

Q. Witness Konidena challenges your discussion of PJM planning concepts and Manual 14H.[24] Does his testimony change your conclusions?

A. My rebuttal testimony referenced PJM planning concepts to illustrate that transmission planning commonly distinguishes facilities by function.[25] It was not intended to suggest that Manual 14H governs the Commission's decision in this proceeding. While Witness Konidena disagrees with the applicability of certain PJM concepts to the Project, that disagreement does not alter the underlying principle that a facility's purpose and function are not determined solely by a customer's request initiating the project. Accordingly, nothing in Witness Konidena's surrebuttal changes the opinions I expressed in my rebuttal testimony.

VII. PHASE 1 AND PHASE 2 CONSIDERATIONS

Q. Witness Konidena argues that certain benefits identified by PPL Electric are contingent upon the separately proposed Phase 2 Project and, therefore, should not support approval of Phase 1.[26] Does that change your opinion regarding the Project before the Commission in this proceeding?

A. No. Phase 2 is the subject of a separate application and will be evaluated in that proceeding. The issue before the Commission in this proceeding is whether the specific HV transmission lines included in the Phase 1 LON satisfy the applicable siting requirements. The fact that aspects of the Project may support future system developments does not alter

[24] OCA St. 2SR, pp. 37-40.
[25] PPL Electric St. 5-R, pp. 24-26.
[26] OCA St. 2SR, pp. 20-21.

the relief requested by the Company or require the Commission to decide issues associated with a separate Phase 2 application before acting on the Phase 1 LON.

Q. Witness Konidena argues that PPL Electric's discussion of future benefits and forward-looking design supports his recommendation that the Company provide a quantitative analysis demonstrating that customer benefits equal or exceed Project costs before the Commission approves the Project, and that PPL Electric has not demonstrated that the benefits he attributes to Phase 2 justify the anticipated treatment of Project costs.[27] Do you agree?

A. I do not agree. The Company has presented evidence supporting the need for the specific HV transmission lines included in the LON. Specifically, the Project is needed to provide service to the Customer and includes the specific HV transmission lines necessary to connect through the Tomhicken 230 kV Switchyard. The relevant question before the Commission is whether those HV transmission lines are needed and satisfy the applicable siting requirements, not whether future benefits associated with the Project can be quantified and shown to exceed Project costs.

Witness Konidena's recommendation assumes that the appropriateness of the Project and its anticipated cost treatment can only be supported through a quantitative analysis of future benefits, including benefits that may be associated with Phase 2. I do not agree with that premise. The fact that the Company did not perform the specific analysis proposed by Witness Konidena does not alter the need for the HV transmission lines that are the subject of the LON or the basis for the Project. Nor does the fact that certain future

[27] OCA St. 2SR, pp. 23-25.

benefits may not be quantified in this proceeding change the Company's decision to incorporate reasonable forward-looking design considerations intended to avoid potentially duplicative investments or future rework.

More fundamentally, Witness Konidena's recommendation would require the Commission to evaluate whether the anticipated allocation and recovery of Project costs are justified before acting on the LON. The Company is not seeking approval of the allocation, recovery, or treatment of Project costs in this proceeding. Rather, the Company seeks approval to construct specific HV transmission lines for which it has demonstrated a need under the Commission's LON process.

VIII. CONCLUSION

Q. Please summarize your conclusions regarding the issues raised by OCA Witnesses Felder and Konidena.

A. OCA Witnesses Felder and Konidena raise several broader issues concerning transmission cost allocation, transmission cost recovery, tariff provisions, stranded costs, load curtailment, resource adequacy, and future system planning. While they may disagree with the Company's positions on those issues, nothing in their surrebuttal testimony changes the relief requested by PPL Electric in this proceeding.

The Company continues to seek approval to construct the facilities identified in its LON application. The need for those facilities arises from the Customer's request for service and the facilities necessary to provide that service through the Tomhicken 230 kV Switchyard Project. The Company has presented evidence supporting the need for those facilities and the design choices reflected in the Project.

Many of OCA's recommendations would require the Commission to expand its review beyond the siting and construction issues presented in this LON to include transmission cost allocation methodologies, future cost recovery mechanisms, tariff modifications, and broader policy issues. The Commission can evaluate the facilities proposed in this LON based on the applicable siting requirements without addressing those additional issues. OCA's recommendations would broaden the scope of this proceeding and could create additional uncertainty regarding the standards applicable to future LON filings.

Importantly, approval of this LON would not predetermine how the broader issues raised by OCA are addressed in future proceedings. It would not constitute approval of the ultimate allocation or recovery of Project costs, nor would it limit OCA's ability to challenge those matters through applicable FERC processes or prevent PJM, FERC, or the Commission from adopting future requirements related to resource adequacy, curtailment, capacity responsibility, registries, or other large-load policies. Those issues remain subject to review in the proceedings specifically designed to address them.

Accordingly, I continue to believe that the Commission can evaluate and approve the facilities proposed in the Project based on the requirements governing LON approvals without determining the allocation, recovery, or treatment of Project costs or addressing the broader transmission planning, tariff, resource adequacy, and large load policy issues raised by OCA. Those issues can continue to be evaluated through ongoing state, regional, and federal proceedings in which they are currently being considered. The issue presented here remains whether the facilities PPL Electric proposes to construct satisfy the requirements applicable to this transmission siting proceeding.

Q. Does this conclude your rejoinder testimony?

A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

Via Electronic Mail Only September 4, 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,

Enclosed for filing with the Pennsylvania Public Utility Commission is the Surrebuttal Testimony of Erika Cook to the in the above-referenced matter.

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

September 4, 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, Surrebuttal Testimony of Erika Cook, 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 4th day of September 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
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570-233-8205

September 4, 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	:	

Surrebuttal Testimony of Erika Cook

I. Surrebuttal to Joseph Lookup Rebuttal Statement No. 1-R, Page 4, Lines 3-8 and 14-15

Mr. Lookup states, "To be clear: PPL Electric has not requested that the Commission make any finding or determination with respect to the reasonableness or prudency of the transmission costs associated with the Project, nor has PPL Electric requested that the Commission make any finding or determination with respect to its proposed allocation of transmission costs between the Customer to be served and PPL Electric's FERC-jurisdictional transmission rate base."

Mr. Lookup continues on, "Mr. Felder and Konidena also appear to make observations, arguments, and recommendations based on much broader topics, including: large load policies at the federal, state, and utility level; changes to the Company's tariff; PPL Electric's transmission cost assignment policies; and Phase 2, which is the subject of a separate and ongoing full Siting Application proceeding. (OCA Statement 1, pp. 3, 25, 29; OCA Statement 2, pp. 89-93.) However, as I just stated, the scope of the LON proceeding is limited to the siting and construction of HV transmission lines, and I am of the view that the proceeding should not become a referendum on other siting matters that are subject to FERC jurisdiction or their own, independent Commission review."

In response I ask, at what point are the reasonableness or prudency of the transmission costs reviewed and by whom? With the Rate Payer Protection Act and Governor Shapiro's Executive Order 2026-05, 100% of the costs for this Project should be paid by the Customer or the Large Load Request Users. At what point is that going to be addressed or revised in the LON?

II. Surrebuttal to Joseph Lookup Rebuttal Statement No. 1-R, Page 4, Lines 20-23 continue to Page 5, Lines 1-4

"The Company is seeking approval to build approximately 1.1 miles of new double-circuit 20 230 kV transmission tap lines, two new 0.1-mile-long 230 kV connecting lines, to interconnect the new Tomhicken 230 kV Switchyard and a Customer-owned substation. The Company is seeking this approval by way of an LON because: the Project is proposed to be located entirely within PPL Electric's existing transmission line ROW and the property of the sole customer to be served by the line and will not substantially alter the ROW; and the proposed route is less than 2 miles."

I believe the LON also includes the approval of creating the Tomhicken switchyard. If the Project does not get the required land use approval to construct anything on the NP Hazleton Holdings 1, LLC property - how will PPL construct the Tomhicken Switchyard? PPL states that there is only a "sole customer" to be served by the line but that leaves out the part about power continuing from the Tomhicken switchyard to serve other "potential" customers. How will this occur if there is no land use approval?

III. Surrebuttal to Joseph Lookup Rebuttal Statement No. 1-R, Page 10, Lines 20-22

Mr. Lookup states that PPL has an obligation to serve. "When a customer requests service from PPL Electric, it is required to extend service under the terms and conditions of its Commission-approved tariff."

According to the Sample Agreement for Large Load Electric Service, page 8, ¶ 19 b., as attached to Mr. Lookup's rebuttal testimony, PPL has the right to terminate the agreement if their Customer fails to complete the Customer Scope of Work, Schedule C as described on page 24, prior to the In-Service Date.

IV. Surrebuttal to Joseph Lookup Rebuttal Statement No. 1-R, Page 14, Lines 8-21

The zoning matter is denied. It was denied by the Township before the LON was submitted. The original ruling should remain in effect unless a stay is granted. This directly impacts this Project per Hazle Township's SALDO as already noted in my Direct Testimony as well as my Motion to Deny/Stay the LON. To continue with approval of the LON with conditions is not a prudent or

efficient use of the Parties' and Commission's resources. The scope of the Customer's power needs could change depending on what, if any, land approval is received. There is no approval as a data center campus. If warehouses are built instead of a data center campus, the power need will be significantly reduced therefore changing the entire scope of this Project. As I stated in my Direct Testimony, we have had Humboldt Industrial Park - the largest industrial park in PA - operating for over 50 years and the existing 230kV line is not currently overloaded. Warehouses are not the reason for such a sudden and significant power increase.

V. Surrebuttal to Joseph Lookup Rebuttal Statement No. 1-R, Page 29, Lines 1-4

When asked if any other notice was provided to affected landowners or to the general public within the Project area, Mr. Lookup answers: "Yes. Consistent with the direction that the Company received, it published notice of the LON and the prehearing conference, and of the public input hearings. The Company's proofs of publication associated with those notices are publicly available on the docket for this matter."

While PPL technically met the requirement of advertising in publications located within the County, I believe they did not act in good faith to make sure that Hazle Township and the surrounding areas were properly notified. Transparency with the Public is more important now than ever with the scope of the current projects being proposed.

VI. Surrebuttal to Joseph Lookup Rebuttal Statement No. 1-R, Page 29, Lines 19 - 23 continued to Page 30, Lines 1-5

PPL was given very specific instructions from Your Honors on advertising for multiple hearings for Phase 1, the LON. The fact that public advertisement has been an issue from the start of this LON and PPL still continues to fail in its responsibility to the Public, shows the lack of consideration and respect that PPL has for the Public. PPL had to be asked for the second time by Your Honors for proof of publication for the upcoming Phase 1 evidentiary hearings. They did not advertise it at all until they were asked about it. Because of this, the public has less time than is required as established in 52 Pa. Code § 57.75 (a) (relating to hearing and notice) to be able to schedule time to attend. Most public citizens need to request time off of work and some employers require that to be done in advance. The people now have less than 30 days notice of these hearings. It is PPL's responsibility to advertise the upcoming hearings, it is not the Public's responsibility. PPL bears the burden in this case and they have failed in their obligation.

VII. Surrebuttal to Kyle Swartzentruber Rebuttal Statement No. 2-R, Page 11, Lines 3-6

Mr. Swartzentruber is correct in that there are CURRENTLY no dwellings or structures located along the edge of the Company's ROW. If you look at Aerial Map 3-1 in Attachment 3 of the LON, sections S1 to S6 are clearly in very close proximity to the residential property lines located in Eagle Rock Resort. The transmission lines, switchyard and substation will likely affect the future development of these properties.

VIII. Surrebuttal to Peter Sparhawk Rebuttal Statement No. 3-R, Page 5, Lines 10-19

Mr. Sparhawk discusses "permits needed to construct the proposed facilities…" and then mentions the Chapter 102 and Chapter 105 Permits have been received. Project Hazelnut has been removed from the Fast Track program and does not have all of the required approvals from DEP. As of today's date, both the Chapter 105 Water Obstructions & Encroachments Permit, E4002224-013A, and the Chapter 102 Erosion & Sediment Permit, PAD400093-A1, are in Pending status according to the Data Center Permit Tracker website provided by PA DEP.

IX. Surrebuttal to Peter Sparhawk Rebuttal Statement No. 3-R, Page 7, Lines 13-14

Mr. Sparhawk indicates that only U.S. EPA-approved herbicides are used. I would like to note that glyphosate is an EPA-approved herbicide that has been proven harmful to human health.

X. Surrebuttal to Chad Huber Rebuttal Statement No. 4-R, Page 4, Lines 8-23 continued to Page 5, Lines 1-8

Mr. Huber describes the April 30, 2025 public open house held by PPL. PPL was advised by multiple state reps who had met with their constituents that we were not interested in an open house style - we wanted a Q&A. PPL states that attendees did not abide by PPL Electric's request but they did not abide by ours either. We all had a lot of the same questions so as PPL mentioned, we had 1 member of the public speak for all of us. We stood there waiting for an answer and PPL declined to answer each time. I personally recorded the meeting and was told I was not allowed to record a public open house by multiple PPL reps - this is recorded on camera. There were over 300 people there. PPL really wanted us to be there all night to ask the same question, over and over and over and over.

In conclusion, I do not believe that PPL has met the burden of proving that the need for this Project is paramount for the health, safety and welfare of the Public.

Wherefore, for the foregoing reasons, I, Erika Cook, pro se Protestant, respectfully requests that the Commission enter an Order Denying PPL Electric's Letter of Notification until PPL can prove the need for the project and that the need is paramount for the health, safety and welfare of the Public.

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: September 4, 2026



_____

Erika Cook, Pro Se Protestant

Exhibit 1A

Pennsylvania
Office of Open Records

Standard Right-to-Know Law Request Form

*Please read carefully. Complete this form and retain a copy of **both** pages; this copy may be required if an appeal is filed. You have 15 business days to appeal after a request is denied or deemed denied. More information about the RTKL is available at https://www.openrecords.pa.gov. In most cases, a completed RTKL request form is a public record.*

SUBMITTED TO AGENCY NAME: Department of Comm. & Econ Develop. (Attn: AORO)

Date Request Submitted: 10/23/25 Submitted via: ☒ Email ☐ U.S. Mail ☐ Fax ☐ In Person

PERSON MAKING REQUEST:

Full Name: Colby Wesner

Company (if applicable): _____

Please send response via: ☒ Email ☐ U.S. Mail

If you wish to obtain records that only exist in hard copy, or must be provided on an electronic storage device, you may be required to provide a mailing address to the agency. See Section 703.

Email: [redacted]@gmail.com

Mailing Address: [redacted]

City: [redacted] State: PA Zip: [redacted] Telephone: [redacted]

How do you prefer to be contacted if the agency has questions? ☐ Telephone ☒ Email ☐ U.S. Mail

☒ **By checking this box, I affirm that my full name and contact information is true and correct, and that I am a legal resident of the United States.** ***I understand that failure to check this box may result in the denial of my request and the dismissal of any appeal filed with the Office of Open Records.***

RECORDS REQUESTED: *Provide as much detail as possible, including subject matter, time frame, and type of record sought. RTKL requests must seek records, not ask questions. Use additional pages if necessary.*

Exhibit 1B

RECORDS REQUESTED (continued):

1. Any and all correspondence, including emails, with attachments, from McGuire Woods Consulting discussing "Project Anvil" since January 2025
2. Any and all non-disclosure agreements signed by members of the PA Department of Community & Economic Development with McGuire Woods Consulting related to Project Anvil.
3. Any and all correspondence, including emails with attachments, between the PA Department of Community & Economic Development and W. Ford Graham of McGuireWoods Consulting, LLC since January 2025.

DO YOU WANT COPIES? ☐ Yes, printed ☒ Yes, electronic ☐ No, in-person inspection

Records shall be provided in the medium requested if they exist in that medium; otherwise, they shall be provided in the medium in which they exist. See Section 701. Your request may require payment or prepayment of fees. View the Official RTKL Fee Schedule for more details.

I understand that my request may incur fees. Notify me before further processing if fees will be more than ☒ $100 (or) ☐ $_____.

Do you want certified copies? ☐ Yes (*may be subject to additional costs*) ☐ No

ITEMS BELOW THIS LINE FOR AGENCY USE ONLY

Tracking: _____ Date Received: _____ Response Due (5 bus. days): _____

30-Day Ext.? ☐ Yes ☐ No (If Yes, Final Due Date: _____) Actual Response Date: _____

Request was: ☐ Granted ☐ Partially Granted & Denied ☐ Denied Cost to Requester: $_____

☐ Appropriate third parties notified and given an opportunity to object to the release of requested records.

From: Robinson, Samuel[redacted]
Sent: Thur 2/20/2025 1:19:36 PM (UTC-05:00)
To: Madrid, Merle[redacted]
Cc: Fakhoury, Ray[redacted] Will Dando[redacted]
Subject: Re: [External] Bolting Into Action Working Session

Thanks for reaching out Merle-- will connect with the folks that have been most directly involved in planning this convening and ask them to add you. Look forward to seeing you there.

Sam

On 2/20/25, 12:52 PM, "Madrid, Merle" <[redacted] <mailto:[redacted] wrote:

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.
<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.pa.gov%2Fcontent%2Fdam%2Fcopapwp-pagov%2Fen%2Foa%2Fdocuments%2Fdocuments%2Fcofense-report-phishing-user-guide.pdf&data=05%7C02%7C[redacted]%7Ca316b0e096744a44569b08dd51d749f7%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638756707275434943%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=bHPJtCi%2FF%2FYJEYnaKLVlOc5iyJc9I58FCswhaFfjtJo%3D&reserved=0>
<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.pa.gov%2Fcontent%2Fdam%2Fcopapwp-pagov%2Fen%2Foa%2Fdocuments%2Fdocuments%2Fcofense-report-phishing-user-guide.pdf&data=05%7C02%7C[redacted]%7Ca316b0e096744a44569b08dd51d749f7%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638756707275434943%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=bHPJtCi%2FF%2FYJEYnaKLVlOc5iyJc9I58FCswhaFfjtJo%3D&reserved=0>>

Sam-

Hope you're well!

Following up on Will's outreach, my colleague Ray Fakhoury, cc'd here, and I are hoping to participate in the March 12 working group. Ray leads AWS's energy public policy for the eastern US and I am our public policy sr manager for the region.

I know there are other AWS folks keen to attend as well, but imagine there may be some space constraints, so would love to have Ray and I there at a minimum.

Appreciate your consideration very much.

-Merle

From: Wade, David[redacted]

Sent: Thur 4/3/2025 12:02:43 PM (UTC-04:00)

To: Ford, Becky[redacted] Kirshner, Benjamin[redacted] Siger, Rick[redacted] Robinson, Samuel[redacted] Graham, Liz[redacted] Ross, Brian[redacted]

Subject: Re: [External] RE: Permitting Connect PA <-> AWS

Hi Becky,
We can make Monday 11-12 work. I'll send an invite to our team + you and Liz. Please feel free to forward/add anyone else from your team that you'd like included in the discussion.

Thanks,
David

From: Ford, Becky <[redacted]
Date: Thursday, April 3, 2025 at 9:56 AM
To: Wade, David <[redacted] Kirshner, Benjamin <[redacted] Siger, Rick <[redacted] Robinson, Samuel <[redacted] Graham, Liz <[redacted] Ross, Brian <[redacted]
Subject: [External] RE: Permitting Connect PA <-> AWS

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.
<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.pa.gov%2Fcontent%2Fdam%2Fcopapwp-pagov%2Fen%2Foa%2Fdocuments%2Fdocuments%2Fcofense-report-phishing-user-guide.pdf&data=05%7C02%7C[redacted]%7C5c86625c4eaf421e75cf08dd72b7622a%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638792854123583942%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=sdfaC3bij1FchtNPSopwAqEuFPY3VBVIhltqmZtQx5I%3D&reserved=0>

Thank you. I was just drafting a response with the same request and adding my colleague Liz Graham, AWS Technical Program Management.

The following are additional recommended times for a call.

Friday 12-1:30pm, 2-3:30pm
Monday 10-12pm

Kind regards
Becky

Becky Ford I Economic Development
AWS Infrastructure Global Expansion
E:[redacted] M: +[redacted]

-----Original Message-----
From: Wade, David <[redacted]
Sent: Thursday, April 3, 2025 8:52 AM
To: Kirshner, Benjamin <[redacted] Siger, Rick <[redacted] Robinson, Samuel <[redacted] Ross, Brian <[redacted] Ford, Becky <[redacted]
Subject: RE: [EXTERNAL] Permitting Connect PA <-> AWS

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good Morning Becky,

Re-upping this with a time on Friday that works on our side:

* Today – 3-4
* Tomorrow – 4-5

We know this is a priority so if those times don't work, we can try to move things around and get as many of our folks as we are able on at a time that works for your team. Please let us know what might work from the AWS side of things.

Thanks,
David

From: Wade, David <[redacted]
Date: Tuesday, April 1, 2025 at 4:15 PM
To: Kirshner, Benjamin <[redacted] Siger, Rick <[redacted] Robinson, Samuel <[redacted] Ross, Brian <[redacted] Ford, Becky <[redacted]
Subject: Re: Permitting Connect PA <-> AWS Becky,

We are happy to connect on this. It looks like the times that work for our full group are:

* 4/2 – 11:30-12:30
* 4/3 – 3-4

Please let us know if either of these times work for your team. We look forward to the conversation.

Thanks,
David

Exhibit 1C

From: Kirshner, Benjamin <[redacted]
Date: Tuesday, April 1, 2025 at 4:05 PM
To: Siger, Rick <[redacted] Wade, David <[redacted] Robinson, Samuel <[redacted] Ross, Brian <[redacted] Ford, Becky <[redacted]
Subject: Re: Permitting Connect PA <-> AWS Great. David, will you try and help coordinate a call with Aws and us(me, you, Sam)

Ben Kirshner | Chief Transformation Officer

Office of the Governor | Office of Transformation and Opportunity

Cell: [redacted]

https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.governor.pa.gov%2F&data=05%7C02%7C[redacted]%7C5c86625c4eaf421e75cf08dd72b7622a%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638792854123606438%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=mkELRH7xypGZyyXr47e2syZ%2Fghnj30UzQgSqm7IFIV8%3D&reserved=0<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.governor.pa.gov%2F&data=05%7C02%[redacted]%7C5c86625c4eaf421e75cf08dd72b7622a%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638792854123618648%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=7MuKjnTg0ktvTZZYj%2FhwepuA3RLYJ%2F0A%2FzDfpy7Lbjs%3D&reserved=0>

From: Siger, Rick <[redacted]
Sent: Tuesday, April 1, 2025 4:00:54 PM
To: Kirshner, Benjamin <[redacted] Wade, David <[redacted] Robinson, Samuel <[redacted] Ross, Brian <[redacted] Ford, Becky <[redacted]
Subject: Permitting Connect PA <-> AWS

Hi folks –

I write today to connect the PA Permit team with Becky Ford from AWS to move our work forward in advance of April 18. Becky and I have spoken, and I've also filled in Ben and Sam Robinson on the path forward.

The goal here is to identify a specific list of issues for the OTO team to tackle – with an eye on the April 18 deadline as a date for meaningful progress. I've also included Sam here because we discussed energy siting and speed issues, as well as Brian Ross who is all things on this project.

Becky mentioned she could have her infrastructure team ready for a discussion on this topic Wednesday or Thursday; I know the PA team is standing by to support.

All best,

Rick

Rick Siger | Secretary

PA Department of Community & Economic Development

Commonwealth Keystone Building

400 North Street, 4th Floor | Harrisburg, PA 17120-0225

Phone: [redacted]

dced.pa.gov<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fdced.pa.gov%2F&data=05%7C02%7C[redacted]%7C5c86625c4eaf421e75cf08dd72b7622a%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638792854123629878%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=S0Nd7HB7ATW7EIX5UiXPa%2Fj3%2BqtK5z7qRyvwqiQtPIQ%3D&reserved=0> | https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.visitpa.com%2F&data=05%7C02%7Cdavidwade%40pa.gov%7C5c86625c4eaf421e75cf08dd72b7622a%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638792854123641221%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=U4IgagkUU%2BhDtCiGe8IGEpDIAU5%2FOVnwt2G4pn91Gok%3D&reserved=0<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.visitpa.com%2F&data=05%7C02%[redacted]%7C5c86625c4eaf421e75cf08dd72b7622a%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638792854123652779%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=qIhaGfpAbab2iUL5Yk5r1YaN6E%2FdCrxNXwaRsKEERU4%3D&reserved=0>

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Exhibit 1C

From: Kirshner, Benjamin[redacted]
Sent: Fri 4/25/2025 10:45:02 AM (UTC-04:00)
To: Ford, Becky[redacted] Siger, Rick[redacted]
Subject: Commonwealth of Pennsylvania – Memo and Joint Agency Commitment Letter
Attachment: Ec Strategy Group Letter to AWS 4.25.25[38].pdf
Attachment: AWS Permitting Memo - Final[58].pdf

Dear Becky,
On behalf of the Commonwealth of Pennsylvania, I am pleased to share the attached Memo detailing the enhanced permit coordination framework established specifically for Amazon Web Services (AWS) development projects within Pennsylvania. Additionally, included is a formal letter of commitment signed by the Secretaries of each state agency involved in the permitting process.

Leadership at the Pennsylvania Department of Environmental Protection (DEP) recently engaged with Brian from our PADEP, reaffirming the Commonwealth's firm commitment to partnership and collaborative engagement—a commitment enthusiastically reciprocated by DEP. As always, DEP's mission remains clear: rigorous protection of Pennsylvania's environment coupled with prompt, reliable communication and permit coordination.

Respectfully,
Ben Kirshner

Ben Kirshner | Chief Transformation Officer
Office of the Governor | Office of Transformation and Opportunity
Cell: [redacted]
www.governor.pa.gov

Exhibit 1C

Commonwealth of Pennsylvania
Economic Development Strategy Group
4/25/2025

Dear Prasad , Roger and Becky:

As members of the Commonwealth's Economic Development Strategy Group, we write to express our shared commitment to the Jmely review and delivery of all permits required for Amazon Data Services, Inc. (ADSI) development projects in Pennsylvania.

We recognize that these projects represent one of the largest strategic infrastructure investments in the Commonwealth and are vital to our state's long-term compeJJveness, economic resilience, and technology leadership. From land development and environmental approvals to air, water, and transportaJon -related permits, ADSI's success depends on coordinated, responsive government at all levels.

To that end, we reaffirm our support for the Office of TransformaJon and Opportunity (OTO) as the centralized coordinaJon enJty for interagency permiXng. OTO serves as our shared point of alignment, ensuring consistent communicaJon, issue escalaJon, and Jmeline tracking across departments. By channeling ADSI's permiXng needs through OTO, we are collecJvely posiJoned to eliminate redundancy, improve transparency, and accelerate delivery while maintaining regulatory integrity.

Each of our agencies is acJvely engaged in advancing the specific permits A DSI requires—whether that involves Chapter 102/105 reviews, Air Quality Plan Approvals, Act 537 coordinaJon, or transportaJon -related approvals. We are fully commi_ed to providing the highest level of service, accountability, and urgency to meet project needs and ensure ADSI receives Jmely, predictable outcomes.

Sincerely,

Jessica L Shirley

Jessica Shirley
AcJng Secretary, Department of Environmental ProtecJon

Exhibit 1C

Michael Carroll
Secretary, Department of TransportaJon

Frederick C. Siger
Secretary, Department of Community and Economic Development

Reginald B. McNeil, II
Secretary, Department of General Services

Russell Redding
Secretary, Department of Agriculture

Nancy A. Walker
Secretary, Department of Labor & Industry

Exhibit 1C

Title: *Upcoming Permit Improvement Outline*
To: AWS Economic Development & Infrastructure Teams
From: Ben Kirshner, Commonwealth of Pennsylvania Chief Transformation & Opportunity Officer
Date: 4/24/2025
Subject: Permit Acceleration, Coordination, and Risk Mitigation Framework for AWS in Pennsylvania

This memorandum is subject to a Non-Disclosure Agreement dated effective as of February 15, 2024

I. Purpose

This memorandum outlines the Commonwealth of Pennsylvania's comprehensive approach to permit coordination, acceleration, and risk mitigation to support AWS's current and future development interests across the state. It builds on existing initiatives led by the **Office of Transformation & Opportunity (OTO)** and includes new 2025 enhancements to DEP systems, project governance, and pre-development services.

The following outlines how Pennsylvania is prepared to support AWS from diligence through project execution, with early certainty on permitting pathways, coordinated regulatory strategies, and strong executive oversight.

II. Overview of the Office of Transformation & Opportunity (OTO)

The **Office of Transformation & Opportunity (OTO)** was established by **Executive Order 2023-05** to make Pennsylvania more competitive for business investment by providing a centralized, executive-level structure to coordinate across state agencies. The office is housed within the Governor's Office and serves as a direct conduit between high-impact developers and the full machinery of government.

OTO's mandate is to facilitate major economic development projects by streamlining multi-agency coordination, ensuring predictable timelines, and resolving issues in real time. The office provides developers with a single-entry point into state government and eliminates the traditional fragmentation across permitting, funding, and regulatory agencies.

In service of this mission, OTO **chairs the Economic Development Strategy Group**, which convenes the heads of the following state agencies to align on strategy and delivery for priority projects:

- **Department of Environmental Protection (DEP)**
- **Department of Transportation (PennDOT)**
- **Department of Community and Economic Development (DCED)**
- **Department of General Services (DGS)**
- **Department of Agriculture (PDA)**
- **Department of Labor & Industry (L&I)**

This group meets regularly to ensure that major projects —like those proposed by AWS—receive timely attention, interagency alignment, and high-level executive oversight.

In addition to coordinating permitting through the **PA Permit Fast Track Program**, OTO also oversees the **PAyback initiative**: the **first-in-the-nation money-back guarantee system** for permits, licenses, and certifications. Through PAyback.pa.gov, businesses may view published processing times and request a refund of their application fee if an agency misses its timeline without valid justification.

This system provides a critical layer of **accountability and transparency** and has already led to substantial internal performance improvements, including drastic reductions in processing times across DEP, PDE, and other regulatory bodies. No refunds have been issued by DEP to date, indicating improved agency compliance and adherence to posted timelines.

Collectively, OTO's tools—Fast Track, PAyback, SPEED, and now the creation of a new DEP Major Projects Office—form a unified framework for permitting certainty. This ensures AWS will have a partner in government that is responsive, accountable, and fully aligned with the timing and complexity of its development projects.

III. Upcoming Improvements to the Permitting Ecosystem

A. Creation of a Major Projects Office

The Commonwealth is in the process of **reviving and modernizing the existing Regional Permit Coordination Office, which will be renamed the Major Projects Office** to serve all **PA Permit Fast Track projects**, not just linear infrastructure. Originally developed to centralize Chapter 102 and 105 permit reviews for multi-region linear projects such as pipeline transmission projects, the **Major Projects Office** will serve large-scale commercial and industrial developments. Alternatively, DEP can enhance its coordination with county conservation districts handling permits for AWS through inclusion in PACT and other ongoing project coordination meetings.

Once activated (expected **mid-to-late 2025**), the **Major Projects Office** will:

- Centralize DEP reviews, removing reliance on **county conservation districts** with variable standards and review speeds. *Of Note: Removing Conservation Districts from the review process must be evaluated through a legal review of the delegation agreements. This process is underway.*
- Increase review consistency and technical quality.
- Shorten timelines through concurrent agency coordination.

Key Advantages for AWS:

The Major Projects Office will be fully integrated into OTO's Fast Track workflow and aligned with AWS project delivery needs and serve as a **single permitting hub** for erosion & sedimentation and water encroachment impacts permitting.

B. Exclusive Early Access to the SPEED Program

(Streamlining Permits for Economic Expansion and Development)

As part of our 2025 permitting reform efforts, the Commonwealth is offering AWS **exclusive early access** to the Department of Environmental Protection's new **SPEED Program — Streamlining Permits for Economic Expansion and Development**.

Launched in **July 2024** as a continuation of DEP's broader **Permit Modernization** agenda, the SPEED Program is designed to help Pennsylvania **move further and faster** on critical permit decisions — keeping pace with large-scale private sector investments and economic expansion.

How SPEED Works:
Through the SPEED Program, applicants pursuing select high-priority DEP permits **may choose** to work with **DEP-approved qualified contractors** who conduct **initial technical reviews** of permit applications. These contractors are trained and vetted by DEP to ensure quality and consistency.

Once the contractor completes its initial review, DEP staff evaluate the contractor's recommendation and make the final determination — to approve, deny, or issue a technical deficiency letter. This hybrid model increases review efficiency while maintaining DEP's oversight and environmental standards.

Eligible Permit Types (Initial Phase):

- **Air Quality Plan Approvals** (State-only – Chapter 127)
- **Earth Disturbance Permits** (Chapter 102)
- **Individual Water Obstruction & Encroachment Permits** (Chapter 105)
- **Dam Safety Permits** (Chapter 105)

Key Advantages for AWS:

- Early engagement with certified experts who can flag technical issues before DEP involvement.
- Faster movement through DEP's internal process due to pre-reviewed, high-quality submissions.
- Maintains full eligibility for **Permit Decision Guarantee** and **PAyback** timelines, giving AWS certainty around review duration and accountability.

DEP is currently coordinating internal and external readiness activities statewide, with full SPEED Program implementation underway in 2025. With OTO support, AWS will be among the first companies to utilize this new program, offering a real-time advantage in project timeline management.

C. DEP Modernization & 2025 Reforms

DEP is undergoing a **technology and process modernization initiative** to transform its permitting operations. These efforts include:

- Launch of a **digital permit portal** for integrated application, submission, and tracking.
- Standardization of processing times and criteria across regional offices.
- Expansion of performance metrics with monthly public reporting.
- Increased staffing and training to reduce backlog and improve customer service.
- Further expansion of the **PAyback money-back guarantee** model.

These reforms, coordinated through OTO and DEP's digital experience team (CODE PA), are on track to deliver measurable speed and certainty gains beginning in **Q3 2025**. *Of Note: the first batch of authorizations included in the new platform does not include development permits*

IV. PHL 100 Deep Dive: Lessons Learned

In response to AWS's experience at the PHL 100 site, the Commonwealth has conducted a thorough retrospective review across agencies to identify causes of delay, clarify permitting expectations, and build a better-forward permitting model for future AWS projects. Below is a summary of the key permits/issues raised, with explanations from DEP and partner agencies.

Exhibit 1C

1. Pennsylvania Natural Diversity Inventory (PNDI) Clearance

Overview:
The PNDI review process is designed to identify potential conflicts between a proposed project and known habitats for threatened or endangered species in Pennsylvania. It coordinates input from the Pennsylvania Fish and Boat Commission (PFBC), Pennsylvania Game Commission (PGC), Department of Conservation and Natural Resources (DCNR), and, where applicable, the U.S. Fish and Wildlife Service.

Findings:

- **PFBC:**
  Average review times are 13 days for initial and 12 days for secondary reviews. Of 2,110 annual reviews, only 0.3% require in-depth biological assessments (BAs), typically involving seasonal species such as the Eastern Spadefoot Toad or Bog Turtle. Reviews extending beyond 60-120 days almost always stem from species-related assessments during biologically sensitive seasons (e.g., dormant winter periods or mating seasons). The PFBC emphasized that federal reviews (e.g., USFWS) can significantly extend timelines beyond state agency averages.
- **PGC:**
  Conducted 819 reviews in FY 2024/25, with 75% cleared without conditions. The average review time was 18 days, with energy projects tending to take longer. Staff includes two dedicated environmental reviewers, and the standard process includes scope review, potential surveys, and clearance or mitigation guidance. Seasonal timing (e.g., nesting periods) affects outcomes. PGC noted that for the Salem Township site, numerous PNDI's were submitted contributing to unnecessary complexity, delays and tree felling that occurred in areas where protected species were identified. PGC recommends a single PNDI be conducted and submitted for each site.
- **DCNR:**
  Average review time is 7–14 days. No concerns were raised regarding backlog or processing delays.
- **DEP Perspective:**
  There is no record of a systemic 120-day delay on the state side. Multiple overlapping submissions may have contributed to confusion. Clearance for one major NPDES component was issued on March 14, 2025, but AWS had not yet resubmitted responses to 537-related deficiencies. The presence of federally listed species (e.g., Indiana bat, green floater mussel) triggered broader federal coordination, which likely contributed to longer timelines.
  *Per a note from AWS: 120 days is was took for us to get the PNDI clearance from **USFWS** and PGC for PHL100 Campus.*

Key Advantages for AWS:

Seasonal species considerations and federal involvement strongly influence PNDI timing. Earlier project phasing and targeted pre-application consultations can mitigate these risks in future AWS sites. Additionally, submitting a single PNDI clearance for an entire site should streamline the process. OTO will work with the three resource agencies to ensure timely responses if any PNDI hits are encountered.

2. Air Quality Permit (Plan Approval No. 40-000158A)

Overview:
AWS's facility was the first of its kind in Pennsylvania —a data center with 56 diesel-fired generators requiring a complex air quality plan approval.

Findings:

- Application received: July 11, 2024
- Public input closed: August 22, 2024
- Technical review and interagency deliberation: September 4, 2024 – January 6, 2025
- Approval issued: February 12, 2025

DEP confirmed that the prolonged technical review (approx. 90 days) was due to the unique nature of the facility, lack of prior precedents, and the complexity of pollution control systems. Future reviews will leverage this permit as a **template** to significantly reduce review time for similar facilities.

3. Act 537 Sewage Planning

Overview:
Act 537 requires local municipalities to approve sewage planning before DEP issues permits. AWS raised concerns about Pennsylvania's lack of parallel review processes.

Findings:

- The planning process is decentralized, with 2,560 municipalities statewide.
- The original approval (Component 3, Oct 2022) covered 6 buildings, but subsequent submissions (Dec 2024) included altered building layouts beyond the allowable variance and conflicting narratives.
- Salem Township confirmed that buildings were relocated post-approval, invalidating prior clearance.
- Technical deficiencies cited missing PNDI data, outdated drawings, PHMC documentation gaps, and layout inconsistencies.

Concurrency in reviews may be possible in the future if AWS maintains consistent project narratives, clearly phased work, and avoids plan alterations post-approval. Pre-application discussions with DEP can ensure alignment and consistency of phases and project development. OTO can coordinate with DEP to define a **concurrent review framework** if AWS submits consistent and complete data packages early. Additionally, OTO is working with DEP to explore whether permitting pathways exist to allow for construction of early phase buildings while maintaining flexibility for future planning, either through amendments or separate permits.

4. Cooling Water Discharge

Overview:
AWS questioned how Pennsylvania interprets non-contact cooling water (NCCW) compared to other states.

DEP Clarification:

- NCCW is regulated under federal definitions and classified as "industrial waste."
- If discharging to Berwick Area Joint Sewer Authority: Requires 537 Planning + Water Quality Management (WQM) Permits.
- If discharging to Susquehanna River: Requires 537 Planning + WQM + Individual NPDES Permit.
- Definitions follow **40 CFR 122.2 and 125.92**. The application burden is lighter for NCCW, but **direct discharge to surface waters** carries greater regulatory requirements.

5. NPDES Permits (General and Individual)

Overview:
AWS indicated that Pennsylvania's review timeline for both **general** and **individual** NPDES permits appears slower than in peer states.

DEP Response:
DEP acknowledges that the permitting experience at the PHL 100 site has highlighted areas for improvement, particularly in the consistency and predictability of permit timelines. However, over the past two years, **DEP has been on a transformative mission to streamline permit times and modernize its internal systems.** This effort includes investments in staff training, digital permit workflows, and internal performance metrics.

By the end of 2025, the Department expects the review timeframes of applications eligible for coverage under the General NPDES Permit for stormwater discharges associated with construction activities to be significantly reduced and **on par with AWS's experience in other states.** These improvements will be supported by clearer guidance, permit intake checklists, and real-time tracking under the Fast Track programs.

DEP is also evaluating where NPDES delays may have stemmed from application complexity, multiple overlapping submissions, or factors external to the agency (e.g., incomplete 537 planning or PNDI conflicts). OTO will support AWS in identifying permit sequencing strategies and ensure clearer expectations around submission timing and completeness to avoid similar delays in the future.

The project was issued a **Notice of Violation** for site work misaligned with approved plans. This notice was issued after three previous site inspections identified inconsistencies which the Luzerne Conservation District brought to the the attention of staff on site. AWS has been working closely with the Conservation District and DEP to stabilize the site and get construction back on track consistent with approved plans. Going forward, OTO will ensure that high-level permitting discussions between AWS and DEP are aligned with and informed by field operations, including inspections, to ensure there are no surprises.

6. Site-Specific Installation Permit

While this issue did not come up in discussions with AWS, these permits are critical to have on hand before AWS lands generators at their sities. The PAyback timeline for these permits is typically 82 business days, but DEP has indicated an ability to speed these up when necessary to meet AWS' construction timelines.

AWS was issued a Notice of Violation for failing to install the concrete foundations where the emergency generator Aboveground Storage Tanks are being placed under the direct, onsite supervision of a DEP-certified installer. DEP is waiting for additional documentation from AWS to ensure that the installation meets the manufacturers' specifications.

V. Early Permitting Strategy Call Offer

We propose scheduling a **permitting strategy call** with AWS project teams to:

- Identify all applicable local, state, and federal permits based on initial project contours.
- Review preliminary sequencing, phasing, and timelines.
- Discuss the Major Projects Office applicability and proposed SPEED intake timing.
- Flag potential environmental justice, wetland, or historical resource triggers early.

Key Advantages for AWS:

OTO staff as well as other high level staff at the Governor's Office and agencies will participate in order to ensure that if issues are identified, they are resolved immediately.

VI. Risk Mitigation Framework

Even with best-in-class coordination, unforeseen risks may arise. In those cases, Pennsylvania offers the following:

- **Escalation Protocol:** OTO will provide AWS with a direct escalation contact within the Governor's Office for any delays or unexpected permitting barriers.
- **Pre-Escalation Briefings:** Weekly calls with OTO and DEP staff to identify and resolve issues in real time, by being on all communications between agency staff and AWS
- **Regulatory Waivers or Flexibilities (where applicable):** While always respecting environmental standards, OTO will work with legal counsel and agencies to consider process waivers, alternative compliance strategies, or emergency hearings if timelines are at risk.
- **Federal Permitting Coordination:** OTO will coordinate with our federal partners to expedite any review times that are being delayed at the federal level.
- **Expedited-Based Reviews:** DEP leadership will conduct expedited reviews and consider external technical review support if bottlenecks occur.

These strategies are tailored to prevent **no permit delays put project delivery at risk**

VII. Site Specific Update

1. Hazelnut Site (NorthPoint as the Developer)

- The Hazelnut project is live on Pennsylvania's **FastTrack program** through the Office of Transformation and Opportunity (OTO). Progress is strong, and the majority of permits are tracking on schedule. https://www.pa.gov/agencies/oto/fasttrack/projecthazelnut.html
- **Current Status:**
  - All submitted permits are on track, with air quality and storage tank permits awaiting submission by AWS.
  - AWS has **not yet submitted applications** for either the **air quality** or **storage tank permits**, both of which will be needed later in the project timeline.
- **Anticipated Timelines:**
  - **Storage Tank Permits:** Standard turnaround is four months. OTO is aiming to help facilitate a **2.5 to 3-month review**, in coordination with DEP.
  - **Air Quality Permit:** Standard timeframe is six months. If needed, we will aim to help deliver it in about four months, contingent on public comment volume.
- **Note:** Per PAyback discussions, AWS has indicated they may not need these permits expedited if the standard delivery times align with their project schedule.

2. Falls Township Site (NorthPoint as the Developer)

- Permitting is **substantially complete** for the initial phase of development.
- **Key Remaining Permits:**
  - **Air Quality Permit** for the site's backup generators. **AWS has not submitted** the application yet but plans to do so by the **end of April**.
  - **Storage Tank Permit(s)** for fuel storage associated with backup systems.

* AWS has requested that the air permit be issued by **July 25**. DEP is currently assessing whether it can meet this expedited timeline, which would represent a four-month turnaround instead of the standard six. As always, the public comment period could influence the delivery schedule.

3. Salem Township Site (AWS as the Developer)

* This is the most complex project in terms of permitting. AWS is acting as the developer and has faced multiple challenges as a result.
* **Permitting Scope:**
  - The site requires **32 separate permits from DEP alone** for phases 0 and 1.
  - Additional permits are also required from **PennDOT** and other state entities.
  - Despite the complexity, we are **close to finalizing a coordinated project plan** that aligns permit timelines with AWS's construction schedule. Once the plan is complete, we will **publish it publicly on the FastTrack website** and track against those commitments.
* **Key Issues:**
  - **Act 537 (Sewage Facilities Planning):**
    - AWS made design changes that shifted the building footprint by approximately 50 feet, triggering the need to restart certain local approval processes.
    - Importantly, DEP has **kept its review open** and is ready to turn around the revised submission quickly, with a **target timeline of 5 days** from resubmission.
  - **Stormwater Permit:**
    - Recent design modifications may alter the existing plan. If the change is considered **minor**, DEP anticipates a **22-day turnaround**. If the change is classified as **major**, it could extend the timeline by **up to 5 months**. **Awaiting AWS to submit.**
  - **DEP Violation:**
    - Earlier this month, DEP issued a significant violation tied to unauthorized earth-moving activities near waterways. This resulted from AWS using an out-of-state general contractor unfamiliar with Pennsylvania's environmental regulations. AWS has acknowledged the violation and is now working with OTO and DEP to **expedite resolution**. **AWS understands what needs to be returned to DEP to satisfy this violation.**

Emerging Site Exploration and Due Diligence

AWS is also evaluating other potential sites for future development. OTO has already engaged in early-stage support:

* **Kline Township:**
  - This site has been mentioned by AWS, but no activity or outreach has been initiated to date.
* **Philadelphia:**
  - Bellwether District is under consideration, but no permitting discussions have occurred due to the impending Peco Power study, which is expected next week. Air Permitting questions have also recently arisen which OTO will assist in investigating.

Additional Site Support

AWS has evaluated the following sites for due diligence and after thorough exploration, with support from OTO and others in the Commonwealth, has decided not to proceed:

* **Upper Mount Bethel Township:**
  - The **Delaware River Basin Commission** has raised concerns regarding **water capacity and energy infrastructure** at the site. AWS is evaluating whether to move forward.
  - OTO has facilitated due diligence by **convening meetings** with relevant state agencies to help AWS assess feasibility.
* **Limerick:**
  - AWS has expressed preliminary interest in a site near Limerick.
  - OTO has supported early due diligence efforts here as well, coordinating with the necessary state contacts.

VIII. Partnership & Next Steps

Pennsylvania is committed to being AWS's most responsive and reliable development partner. Our actions to revive RPCO, offer early SPEED access, modernize DEP, and expand Fast Track oversight are all built to give AWS confidence and control.

We look forward to:

- Finalizing early permitting engagement (SPEED + Fast Track onboarding).
- Delivering the PHL 100 debrief.
- Hosting the AWS permitting roadmap call.
- Continuing weekly coordination with your economic development team.

Should AWS have additional ideas to further enhance trust and certainty, we welcome that discussion and are ready to adapt to your needs.

Sincerely,
Ben Kirshner
Chief Transformation & Opportunity Officer
Chair, Economic Development Strategy Group
Commonwealth of Pennsylvania

Exhibit 1C

From: Holliday, Mariana[redacted]

Attendees: Ross, Brian; Okai, Danielle; Ross, Gwen; Lee-Romagnolo, Nicholas; [redacted] Shaw, Kate; Amann, Carrie; Pittman, Judd; [redacted] Iverta; [redacted] Berman, Mike; Jernigan, Quin; Affrunti, Christopher; Thompson, Jessica [C]; [redacted]

Location: Arlington, VA (Amazon HQ2)

Subject: AWS Workforce Development: Regional Convening (PHL)

Importance: Normal

Start Time: Wed 8/27/2025 3:00:00 AM (UTC-04:00)

End Time: Fri 8/29/2025 3:00:00 AM (UTC-04:00)

Required Attendees: Ross, Brian; Okai, Danielle; Ross, Gwen; Lee-Romagnolo, Nicholas; [redacted] Shaw, Kate; Amann, Carrie; Pittman, Judd; [redacted] Iverta; [redacted]

Optional Attendees: Berman, Mike; Jernigan, Quin; Affrunti, Christopher; Thompson, Jessica [C]

Executive Summary. On August 27th and 28th 2025, a delegation of workforce, education and economic development leaders from ATL, PHL, and CLT (Atlanta metro, Pennsylvania, and North Carolina) will travel to Amazon HQ2 to catalyze effective collaboration with AWS around important workforce and education initiatives. This invite outlines the plan for the two days of meetings. Day 1 (Wednesday, August 27th) will include introductions, a tour of an AWS data center facility, and a career panel. Day 2 (Thursday, August 28th) will feature meetings with AWS infra leaders (construction, ops, fiber, engineering), representatives from our contractors, and regional breakout sessions for planning purposes.

Day 1 Data Center Tour and Introductions: Attendees will begin their day with a tour of an AWS Data Center. Amazon will charter vans to transport attendees to an AWS Data Center, returning attendees to HQ2 (Arlington) in the afternoon for lunch, networking, a career panel and optional tours of HQ2.

Day 2 Infra Leadership Discussions and Regional Breakout Sessions: The Amazon HQ2 office is walk-able from the Marriott Gateway Crystal City. Day 2 will feature meetings with AWS infra leaders (construction, ops, fiber, engineering), representatives from our contractors, and regional breakout sessions for planning purposes.

The workshop's agenda aims to deepen understanding of:

- the nature and scale of current and future talent demands;
- the current landscape of workforce development and education in the ATL, PHL, and CLT regions;
- best practices that we can leverage to build durable partnerships that can support long-term talent development; and

- the “stakeholder map” within and across the various organizations and regions that are involved in this important work.

Who is coming?

The AWS Economic Development Workforce Development team has collaborated with leaders in the three regions (ATL, PHL, and CLT) to organize the delegation of education and workforce leaders at the state and local levels, with representation across university, community college, K-12, and adult education systems. In addition, economic developers at the state and regional levels will attend to learn how they can support these efforts.

Summary Agenda

- **Wednesday, August 27th, 2025 [Arlington, VA] - 8:00am-4:00pm (+ optional happy hour/reception)**
  - lunch provided
  - optional tours of HQ2
- **Thursday, August 28th, 2025 [Arlington, VA] - 8:00am - 2:30 (+ optional afternoon activities)**
  - breakfast and lunch provided

Recommended Travel & Accommodations

Day 1 will be in Arlington and at an AWS Data Center in VA. Day 2 will be in Arlington, VA.

Flights: There are three airports that serve the DMV: DCA, IAD, and BWI. All are viable options for travel to/from the area, however DCA and IAD are more conveniently located to our planned activities.

Accommodations: We recommend staying in Arlington near the Amazon office at the Marriott Gateway Crystal City (1700 Richmond Hwy, Arlington, VA 22202). The room block link will be provided when you confirm your attendance (**see call to action below**). There are a variety of hotel options close by as well.

What is the attire?

Casual/business casual. Please wear sturdy, close-toed shoes (boots preferred) on Wednesday for the data center tour. There will be quite a bit of walking.

Call to Action: Please confirm your attendance by ACCEPTING or DECLINING the invite by Friday, August 8th. The room block link will be provided when you confirm your attendance.

Your AWS region contact will also follow up with you to answer any questions you may have.

Exhibit 1C

From: Holliday, Mariana[redacted]
Sent: Fri 8/8/2025 8:02:55 PM (UTC-04:00)
To: Okai, Danielle[redacted]
Cc: Lee-Romagnolo, Nicholas[redacted]
Subject: [External] August 2025 AWS Workforce Development Regional Convening: Hotel Room Block Link

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.*

Hello,

Thank you for RSVP'ing to our August 2025 AWS Workforce Development Regional Convening.

Here is the link for the hotel room block for the week of August 25-29th. **The block to reserve a room will end Monday, August 11th at 5pm EST, please book your hotel as soon as possible.**

Hotel Information:
Crystal Gateway Marriott
1700 Richmond Highway
Arlington, VA 22202

Reach out if you have questions! More info to come in the coming weeks.

Cheers,

AWS Workforce Development Team

Exhibit 1C

From: Lee-Romagnolo, Nicholas[redacted]
Sent: Mon 8/11/2025 4:28:36 PM (UTC-04:00)
To: Lee-Romagnolo, Nicholas[redacted]
Cc: Holliday, Mariana[redacted]
Subject: [External] ROOM BLOCK - please reserve today! - AWS Workforce Development Regional Convening Invite

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.*

Hello All,

Please see the note below … if you are on this email, you have received an invite to Northern VA at the end of the month. If you haven't booked your room – the room block is saved until EOD today, so please make sure to do that. If you haven't RSVP'd we would also appreciate that so that we can attend to the logistics of bringing leadership together from 3 different states to learn and plan with us. Please let us know if you have any questions – and we look forward to hosting you all soon.

Nick Lee-Romagnolo
Principal, AWS Economic and Workforce Development

Executive Summary. On August 27th and 28th 2025, a delegation of workforce, education and economic development leaders from ATL, PHL, and CLT (Atlanta metro, Pennsylvania, and North Carolina) will travel to Amazon HQ2 to catalyze effective collaboration with AWS around important workforce and education initiatives. This invite outlines the plan for the two days of meetings. Day 1 (Wednesday, August 27th) will include introductions, a tour of an AWS data center facility, and a career panel. Day 2 (Thursday, August 28th) will feature meetings with AWS infra leaders (construction, ops, fiber, engineering), representatives from our contractors, and regional breakout sessions for planning purposes.

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Who is coming?
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  - lunch provided
  - optional tours of HQ2
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  - breakfast and lunch provided

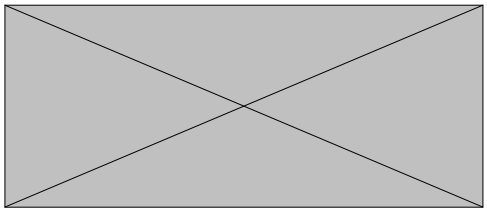
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Day 1 will be in Arlington and at an AWS Data Center in VA. Day 2 will be in Arlington, VA.

Flights: There are three airports that serve the DMV: DCA, IAD, and BWI. All are viable options for travel to/from the area, however DCA and IAD are more conveniently located to our planned activities.

Accommodations: We recommend staying in Arlington near the Amazon office at the Marriott Gateway Crystal City (1700 Richmond Hwy, Arlington, VA 22202). Here is a link to the room block **(expires at 5pm EST 8/11).** There are a variety of hotel options close by as well.

What is the attire?
Casual/business casual. Please wear sturdy, close-toed shoes (boots preferred) on Wednesday for the data center tour. There will be quite a bit of walking.

Call to Action: Please confirm your attendance by ACCEPTING or DECLINING the invite ASAP.



Welcome To Amazon

Book your hotel room for the event at special rates, available here on an exclusive basis.
book.passkey.com

Your AWS region contact will also follow up with you to answer any questions you may have.

Cheers,

Mariana

Exhibit 1C

From: Holliday, Mariana

Sent: Fri 8/22/2025 1:38:08 AM (UTC-04:00)

To: Patrick Jones; Shawn Thomas; Kenneth R. Nasatka; Shaw, Kate; Amann, Carrie; Pittman, Judd; Dr. Nicholas Neupauer; Dr. Tuesday Stanley; Michael Narcavage; King, Andrew; Iverta; Trahan, Kelly; Okai, Danielle; Ross, Brian; Ross, Gwen; Momjian, Carol; Martini, James; john; Shawver, Todd; Brian K. Stokes;

Cc: Lee-Romagnolo, Nicholas; Berman, Mike; Jernigan, Quin

Subject: [External] AWS Workforce Development August 2025 Regional Convening <details, full schedule, and important reminders>

Attachment: AWS Workforce Development August 2025 Regional Convening - Briefing Doc.docx

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.*

Hi everyone,

We are so excited for next week's time together! We wish you all safe and uneventful travels to Washington DC/Virginia. We are getting the entire group on a thread together – leaders from Pennsylvania and the AWS Workforce Development team – so that we're all on the same page in terms of logistics for Day 1 of our time together.

Attached to this email you will find a briefing document with information about our time together as well as the detailed schedule for both days of meetings.

Day 1 Reminders (Wednesday, August 27th):
1. **Photo ID.** All participants must bring a government-issued photo ID (that's all you need 😊).
2. **Attire.** Casual/business casual. Please wear sturdy, close-toed shoes (boots preferred) on Wednesday for the data center construction site tour. There will be quite a bit of walking.
3. **PPE**. As we arrive at the Data Center Construction Site, you will be issued a hard hat, safety goggles, safety toe protectors, and a safety vest. Please wear them at all times, as instructed.
4. **Cell phones**. Absolutely no pictures are permitted inside or outside the Data Center Construction site. We will be collecting cell phones upon arrival at the Data Center Construction site and we will hold them for safekeeping. Once the Data Center Construction Site tour ends and we board the buses to our next stop, we will re-distribute phones.

Exhibit 1C

We will all be meeting in the lobby of the Marriott Crystal Gateway (1700 Richmond Hwy, Arlington, VA 22202) at 8:00am on Wednesday August 27th!

Please don’t hesitate to reach out to Nick if you have any questions or find yourself needing support. Nick's cell is [redacted]

Safe travels and see you all soon,

Mariana, Mike, Nick, and Quin

Exhibit 1C

Executive Summary. On August 27th and 28th 2025, a delegation of workforce, education and economic development leaders from ATL, PHL, and CLT (Atlanta metro, Pennsylvania, and North Carolina) will travel to Amazon HQ2 to catalyze effective collaboration with AWS around important workforce and education initiatives. This invite outlines the plan for the two days of meetings. Day 1 (Wednesday, August 27th) will include introductions, a tour of an AWS data center construction site, and a career panel. Day 2 (Thursday, August 28th) will feature meetings with AWS infra leaders (construction, ops, fiber, engineering), representatives from our contractors, and regional breakout sessions for planning purposes.

Day 1 Data Center Construction Site and Introductions: Attendees will begin their day with a tour of an AWS Data Center Construction site. Amazon will charter vans to transport attendees to an AWS Data Center Construction Site, then NOVA's Data Center Learning lab, returning attendees to HQ2 (Arlington) in the afternoon optional tours of HQ2 and Happy Hour.

Day 2 Infra Leadership Discussions and Regional Breakout Sessions: The Amazon HQ2 office is walk-able from the Marriott Gateway Crystal City. Day 2 will feature meetings with AWS infra leaders (construction, ops, fiber, engineering), representatives from our contractors, and regional breakout sessions for planning purposes.

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    - lunch provided
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Recommended Travel & Accommodations

Day 1 will be in Arlington and at an AWS Data Center Construction site in VA. Day 2 will be in Arlington, VA at the Amazon Headquarters.

Exhibit 1C

Flights: There are three airports that serve the DMV: DCA, IAD, and BWI. All are viable options for travel to/from the area, however DCA and IAD are more conveniently located to our planned activities.

Accommodations: We recommend staying in Arlington near the Amazon office at the Marriott Gateway Crystal City (1700 Richmond Hwy, Arlington, VA 22202). There are a variety of hotel options close by as well.

What is the attire?
Casual/business casual. Please wear sturdy, close-toed shoes (boots preferred) on Wednesday for the data center tour. There will be quite a bit of walking.

Who should I contact if I need help or have questions?
North Carolina leaders can contact Mariana Holliday [redacted]
Pennsylvania leaders can contact Nick Lee Romagnolo [redacted]
Atlanta leaders can contact Quin Jernigan [redacted]
Other leaders or internal AWS team members can contact Mariana Holliday [redacted]

Day 1 Detailed Agenda (Wednesday, August 27th 2025)

Morning Meet Up Location (8:00am Meet Up time): Crystal Gateway Marriott (1700 Richmond Hwy, Arlington, VA 22202)

1	**Approx. Time**	**Event**
2	8:00am	Group Rallies in lobby of Crystal Gateway Marriott, Crystal City
3	8:30am	Buses Depart from Crystal Gateway Marriott (1700 Richmond Hwy, Arlington, VA 22202).
4	9:15am	Buses arrive IAD193. (8300 Buckeye Timber Dr, Manassas, VA 20109). Buses drop off participants. Security Check-in on buses (if possible)
5	9:30am	Group escorted to Break Area for PPE and Safety Briefing
6	9:45am	Safety and Security Briefing
7	10:30 am	Tour Begins
8	12:00 pm	Networking Lunch in WT Break Room. AWS Econ Dev to cater
9	12:45 pm	Career Panel
10	1:30pm	Guests Escorted to Buses
11	2:00pm	Buses Depart IAD193 for NOVA Woodbridge
12	2:45pm	Buses Arrive NOVA Woodbridge Regional Center for Workforce Education and Training, 2675 College Dr, Woodbridge, VA 22191
13	3:00 pm	Tour of NOVA Data Center Learning Lab
14	4:00pm	Buses depart for Amazon WAS17 - Merlin, 510 14th St S, Arlington, VA 22202
15	4:45pm/5:00pm	Buses arrive WAS17, tour of Amazon HQ2
16	5:30pm	Happy Hour on Roof Deck

Exhibit 1C

Day 2 Detailed Agenda (Thursday, August 28th, 2025)

Meeting Location: Amazon Visitor Landing (545 15th St. South, Arlington, VA 22202)

1	**Approx. Time**	**Event**
2	8:30 am	Arrival and Check-in at **Amazon Visitor Landing** (545 15th St. South, Arlington, VA 22202) Light Breakfast/Networking.
3	8:50 am	Welcome, Intros, and Review Agenda
4	9:15 am	Working Backwards from Demand: AWS Infra Leaders Panel Discussion.
5	10:15 am	Break
6	10:30 am	Virginia Leaders' Panel
7	11:30 am	Group Discussion with Virginia Leaders
8	12:00 pm	Networking Lunch
9	1:00 pm	Regional Breakout Sessions - Community Leaders' Roundtable - Regional Strategic Planning
10	2:30 pm	Closeout and Thank You!

Exhibit 1C

From: Shapiro, Josh[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7513B1F629014D2EB571C426276B10EC-89CF6296-01]

Sent: Mon 8/25/2025 6:14:36 PM (UTC-04:00)

To: Matt Garman[redacted]

Cc: Shannon Kellogg[redacted]

Bcc: Siger, Rick[redacted] Nealon, Conor[redacted] Warren, Amanda[redacted]

Subject: Re: [External] Thank You For Your Time at the PA Energy and Innovation Summit

Matt:

I enjoyed spending time with you in Pittsburgh. Thanks for making the effort to be there.

We are thankful and excited about AWS historic investment and I agree that our teams continue to work very well together and we continue to be committed to your success in PA.

We also look forward to the Fall announcement of the additional sites in PA, and would love to collaborate to maximize the impact of those announcements and share the story of positive economic and community outcomes together. I also hope that you can personally be there for what I know will be another big boost for our communities.

Beyond your infrastructure build out we appreciate your partnership on leveraging AWS tech to benefit PA in areas like healthcare and innovation. Given this new federal law that will gut healthcare access for about a half million Pennsylvanians, your tech will be critical to helping us jump through the many new hoops that the Feds will require and protect as many people as we can in the process from losing their benefits.

My door is always open should you have issues or ideas you wish to discuss. Please keep in touch.

JDS

> On Aug 22, 2025, at 12:32 PM, Garman, Matt <[redacted] wrote:

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.*

Exhibit 1C

Dear Governor Shapiro,

Thank you for taking the time to meet with me and my team in Pittsburgh at the inaugural Pennsylvania Energy and Innovation Summit on July 15th. I truly appreciate you and your team's tireless support to enable AWS' $20 billion investment in the Keystone State. I am also encouraged to hear that your team and mine are collaborating on solutions to fully leverage AWS technology to help expedite healthcare determinations for Pennsylvanians. I look forward to continuing to work with you, and please don't hesitate to contact me or my team should you need anything.

Thank you,
Matt Garman

From: Lee-Romagnolo, Nicholas [redacted]

Sent: Tue 8/26/2025 11:29:38 PM (UTC-04:00)

To: Shaw, Kate [redacted]

Cc: Holliday, Mariana[redacted] Patrick
Jones[redacted] Shawn
Thomas[redacted] Kenneth R.
Nasatka[redacted] Amann, Carrie[redacted]
Pittman, Judd[redacted] Dr. Nicholas
Neupauer[redacted] Dr. Tuesday
Stanley[redacted]
[redacted] Michael
Narcavage[redacted] Andrew King[redacted]
[redacted] Iverta[redacted] Kelly
Trahan[redacted] Okai, Danielle[redacted] Ross,
Brian[redacted] Ross, Gwen[redacted] Momjian,
Carol[redacted] Martini, James[redacted]
john[redacted] Todd Shawver[redacted]
[redacted] Brian K.
Stokes[redacted]
[redacted] Berman,
Mike[redacted] Jernigan, Quin[redacted]

Subject: Re: [External] AWS Workforce Development August 2025 Regional Convening <details, full schedule, and important reminders>

Hello All,

If you're running late, we will have donuts and coffee on the bus for you!

See you in the morning,

Nick
Sent from my iPhone

> On Aug 26, 2025, at 8:55 PM, Shaw, Kate <[redacted]> wrote:
>
> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.
>
>
>
> Hello PA Team! Many thanks to those of you who were able to make it to dinner tonight. It was terrific to have a chance to learn more about each others' work and to share insights into how best to meet the workforce needs of AWS and the commonwealth more broadly.
>
> A heads up about tomorrow (Wednesday) morning: we are meeting in the lobby at 8 am, and AWS will not be providing us with breakfast! If you'd like to eat before we leave, please note that the Marriott's breakfast service begins at 6:30 am in their restaurant on the lobby floor.
>
> Sleep well. Looking forward to having the whole PA contingent together tomorrow.
>
> Kate

>
> _____
> From: Shaw, Kate
> Sent: Monday, August 25, 2025 5:29:31 PM
> To: Holliday, Mariana < Patrick Jones < Shawn Thomas < Kenneth R. Nasatka < Amann, Carrie < Pittman, Judd < Dr. Nicholas Neupauer < Dr. Tuesday Stanley < < Michael Narcavage < King, Andrew < < Iverta < Trahan, Kelly < Okai, Danielle < Ross, Brian < Ross, Gwen < Momjian, Carol < Martini, James < john < Shawver, Todd < < Brian K. Stokes < <
> Cc: Lee-Romagnolo, Nicholas < Berman, Mike < Jernigan, Quin <
> Subject: RE: [External] AWS Workforce Development August 2025 Regional Convening <details, full schedule, and important reminders>
>
>
> Hello everyone! I am really looking forward to our gathering in Virginia.
>
>
>
> For those of you who will be arriving tomorrow, I will be reserving a large-ish table for us in the hotel's restaurant at 6. Yes I am prioritizing ease and convenience over culinary adventure! Hoping that's ok.
>
>
>
> If you'd like to join us for dinner, please let me know—or just show up! See you all soon.
>
>
>
> My best,
>
> Kate
>
>
>
> From: Holliday, Mariana <
> Sent: Friday, August 22, 2025 1:38 AM
> To: Patrick Jones < Shawn Thomas < Kenneth R. Nasatka < Shaw, Kate < Amann, Carrie < Pittman, Judd < Dr. Nicholas Neupauer < Dr. Tuesday Stanley < Michael Narcavage < King, Andrew < Iverta < Trahan, Kelly < Okai, Danielle < Ross, Brian < Ross, Gwen < Momjian, Carol < Martini, James < john < Shawver, Todd < Brian

K. Stokes <[redacted]
> Cc: Lee-Romagnolo, Nicholas <[redacted] Berman, Mike <[redacted]
Jernigan, Quin <[redacted]
> Subject: [External] AWS Workforce Development August 2025 Regional Convening <details, full schedule, and important reminders>
>
>
>
> ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.
<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.pa.gov%2Fcontent%2Fdam%2Fcopapwp-pagov%2Fen%2Foa%2Fdocuments%2Fdocuments%2Fcofense-report-phishing-user-guide.pdf&data=05%7C02%7C[redacted]%7C1532a2149f104a2c838d08dde519fa56%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638918621967072524%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=qs5F5X8ILfDZNXi6nKD7e3Tl1Dk9hRaxPEV8bRDFqjE%3D&reserved=0>
>
> Hi everyone,
>
> We are so excited for next week's time together! We wish you all safe and uneventful travels to Washington DC/Virginia. We are getting the entire group on a thread together – leaders from Pennsylvania and the AWS Workforce Development team – so that we're all on the same page in terms of logistics for Day 1 of our time together.
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>
> Attached to this email you will find a briefing document with information about our time together as well as the detailed schedule for both days of meetings.
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> 3. PPE. As we arrive at the Data Center Construction Site, you will be issued a hard hat, safety goggles, safety toe protectors, and a safety vest. Please wear them at all times, as instructed.
> 4. Cell phones. Absolutely no pictures are permitted inside or outside the Data Center Construction site. We will be collecting cell phones upon arrival at the Data Center Construction site and we will hold them for safekeeping. Once the Data Center Construction Site tour ends and we board the buses to our next stop, we will re-distribute phones.
>
> We will all be meeting in the lobby of the Marriott Crystal Gateway (1700 Richmond Hwy, Arlington, VA 22202) at 8:00am on Wednesday August 27th!
>
>
>
> Please don't hesitate to reach out to Nick if you have any questions or find yourself needing support. Nick's cell is [redacted]
>
> Safe travels and see you all soon,
>

> Mariana, Mike, Nick, and Quin
>
>
>
>
>
>

Exhibit 1C

From: Lee-Romagnolo, Nicholas [redacted]

Sent: Thur 8/28/2025 1:34:07 PM (UTC-04:00)

To: Shaw, Kate [redacted] Holliday, Mariana [redacted] Patrick Jones [redacted] Shawn Thomas [redacted] Kenneth R. Nasatka [redacted] Amann, Carrie [redacted] Pittman, Judd [redacted] Dr. Nicholas Neupauer [redacted] Dr. Tuesday Stanley [redacted] Michael Narcavage [redacted] King, Andrew [redacted] Iverta [redacted] Trahan, Kelly [redacted] Okai, Danielle [redacted] Ross, Brian [redacted] Ross, Gwen [redacted] Momjian, Carol [redacted] Martini, James [redacted] john [redacted] Shawver, Todd [redacted] Brian K. Stokes [redacted]

Cc: Berman, Mike [redacted] Jernigan, Quin [redacted]

Subject: RE: [External] AWS Workforce Development August 2025 Regional Convening <details, full schedule, and important reminders>

Attachment: MS.Simple.Regional.WFD.Implementation.Plan - for Convening.xlsx

Current programs after 18 months in MS ... the

-----Original Message-----
From: Shaw, Kate <[redacted]
Sent: Tuesday, August 26, 2025 8:54 PM
To: Holliday, Mariana <[redacted] Patrick Jones <[redacted] Shawn Thomas <[redacted] Kenneth R. Nasatka <[redacted] Amann, Carrie <[redacted] Pittman, Judd <[redacted] Dr. Nicholas Neupauer <[redacted] Dr. Tuesday Stanley <[redacted] Michael Narcavage <[redacted] King, Andrew <[redacted] Iverta <[redacted] Trahan, Kelly <[redacted] Okai, Danielle <[redacted] Ross, Brian <[redacted] Ross, Gwen <[redacted] Momjian, Carol <[redacted] Martini, James <[redacted] john <[redacted] Shawver, Todd <[redacted] Brian K. Stokes <[redacted]
Cc: Lee-Romagnolo, Nicholas <[redacted] Berman, Mike <[redacted] Jernigan, Quin <[redacted]
Subject: RE: [EXTERNAL] [External] AWS Workforce Development August 2025 Regional Convening <details, full schedule, and important reminders>

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello PA Team! Many thanks to those of you who were able to make it to dinner tonight. It was terrific to have a chance to learn more about each others' work and to share insights into how best to meet the

workforce needs of AWS and the commonwealth more broadly.

A heads up about tomorrow (Wednesday) morning: we are meeting in the lobby at 8 am, and AWS will not be providing us with breakfast! If you'd like to eat before we leave, please note that the Marriott's breakfast service begins at 6:30 am in their restaurant on the lobby floor.

Sleep well. Looking forward to having the whole PA contingent together tomorrow.

Kate

From: Shaw, Kate
Sent: Monday, August 25, 2025 5:29:31 PM
To: Holliday, Mariana < Patrick Jones < Shawn Thomas < Kenneth R. Nasatka < Amann, Carrie < Pittman, Judd < Dr. Nicholas Neupauer < Dr. Tuesday Stanley < < Michael Narcavage < King, Andrew < < Iverta < Trahan, Kelly < Okai, Danielle < Ross, Brian < Ross, Gwen < Momjian, Carol < Martini, James < john < Shawver, Todd < < Brian K. Stokes < <
Cc: Lee-Romagnolo, Nicholas < Berman, Mike < Jernigan, Quin <
Subject: RE: [External] AWS Workforce Development August 2025 Regional Convening <details, full schedule, and important reminders>

Hello everyone! I am really looking forward to our gathering in Virginia.

For those of you who will be arriving tomorrow, I will be reserving a large-ish table for us in the hotel's restaurant at 6. Yes I am prioritizing ease and convenience over culinary adventure! Hoping that's ok.

If you'd like to join us for dinner, please let me know-or just show up! See you all soon.

My best,

Kate

From: Holliday, Mariana <
Sent: Friday, August 22, 2025 1:38 AM

Exhibit 1C

To: Patrick Jones <[redacted] Shawn Thomas <[redacted] Kenneth R. Nasatka <[redacted] Shaw, Kate <[redacted] Amann, Carrie <[redacted] Pittman, Judd <[redacted] Dr. Nicholas Neupauer <[redacted] Dr. Tuesday Stanley <[redacted] Michael Narcavage <[redacted] King, Andrew <[redacted] Iverta <[redacted] Trahan, Kelly <[redacted] Okai, Danielle <[redacted] Ross, Brian <[redacted] Ross, Gwen <[redacted] Momjian, Carol <[redacted] Martini, James <[redacted] john <[redacted] Shawver, Todd <[redacted] Brian K. Stokes <[redacted]
Cc: Lee-Romagnolo, Nicholas <[redacted] Berman, Mike <[redacted] Jernigan, Quin <[redacted]
Subject: [External] AWS Workforce Development August 2025 Regional Convening <details, full schedule, and important reminders>

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook. <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.pa.gov%2Fcontent%2Fdam%2Fcopapwp-pagov%2Fen%2Foa%2Fdocuments%2Fdocuments%2Fcofense-report-phishing-user-guide.pdf&data=05%7C02%7C[redacted]%7Cea889b4d37024027891308dde6591e34%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638919992765716670%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=KLT6%2FeT%2BA89Wuv357JmN%2FygMJqgU3g7cRRK%2Fkx2pmHs%3D&reserved=0>

Hi everyone,

We are so excited for next week's time together! We wish you all safe and uneventful travels to Washington DC/Virginia. We are getting the entire group on a thread together - leaders from Pennsylvania and the AWS Workforce Development team - so that we're all on the same page in terms of logistics for Day 1 of our time together.

Attached to this email you will find a briefing document with information about our time together as well as the detailed schedule for both days of meetings.

Day 1 Reminders (Wednesday, August 27th):
1. Photo ID. All participants must bring a government-issued photo ID (that's all you need ??).
2. Attire. Casual/business casual. Please wear sturdy, close-toed shoes (boots preferred) on Wednesday for the data center construction site tour. There will be quite a bit of walking.
3. PPE. As we arrive at the Data Center Construction Site, you will be issued a hard hat, safety goggles, safety toe protectors, and a safety vest. Please wear them at all times, as instructed.
4. Cell phones. Absolutely no pictures are permitted inside or outside the Data Center Construction site. We will be collecting cell phones upon arrival at the Data Center Construction site and we will hold them for safekeeping. Once the Data Center Construction Site tour ends and we board the buses to our next stop, we will re-distribute phones.

We will all be meeting in the lobby of the Marriott Crystal Gateway (1700 Richmond Hwy, Arlington,

VA 22202) at 8:00am on Wednesday August 27th!

Please don't hesitate to reach out to Nick if you have any questions or find yourself needing support. Nick's cell is [redacted]

Safe travels and see you all soon,

Mariana, Mike, Nick, and Quin

Exhibit 1C

Program	Description	Anchor Partner	Status Update May 2025
Facilites and Equipment			
Amazon Community Workforce Accelerator (brick and mortar training facility)	Full-scale Information Infrastructure training center with flexible learning labs and state-of-the-art data center/infra technology. Will also have community gathering spaces to serve as "doorstep" of our local investment.	AccelerateMS; Holmes & Hinds CCs; Madison, Jackson & Canton SDs; Central MS Planning & Dev District; MS State Univ	In Progress. Program phase complete, currently in architectural design phase with multiple AWS teams (e.g. Construction, Ops, Security, Fiber). Target build 2H 2025/1H 2026.
JAN100 Mobile Training Campus ("MTC")	Campuses include hands-on learning in mobile labs filled with cutting edge technology, housed on or near data center construction sites and community college campuses to support entry-level pipelines as well as incumbent worker upskilling for skilled trade and DC	AccelerateMS; Holmes & Hinds CCs; Madison, Jackson & Canton SDs; Central MS Planning & Dev District; Yates Construction	In Progress. Expected completion Q3 2025. Plans in place to host initial programs in collab with local high schools and community colleges (see I2PA below), as well as training for incumbent contractors.
Sustainable Energy Lab	Advanced equipment and software tools, the Renewable Energy Lab will allow students to explore, analyze, and simulate data related to renewable energy sources as well as the complex design and operation of microgrids. This lab is necessary for University-level design engineering (electrical and	AccelerateMS; MS State (TBC)	In Progress. Early stage scoping with MS State, in conjunction with state RFI for AI workforce dev program ($10M grant program AccelerateMS and MDA will offer to support AI innovation in MS). Targeting potential launch 2026.
AWS Equipment Donation Program	Provides surplus and decommissioned data center equipment and computing hardware through collaboration with AWS Reverse Logistics (RL) team.	Holmes & Hinds CCs; Madison, Jackson & Canton SDs; Jackson State	Launched/Ongoing. Laptops donated May 2024. Targeting Q3 2025 for next traunch of DC equipment in conjunction with launch of MTC Q2 2025.
Blue-Collar Tech Equipment Package	Training equipment to provide hands-on learning opportunities that are critical to the skills required to build, connect and operate data centers, e.g. server racks and structured cabling; electrical systems; motor controls; fiber splicing, testing and termination equipment; data center power line-ups; and HVAC trainers.	AccelerateMS / CMPPD (consortium of schools to purchase equipment) - Hinds CC is initial focus for new BCT building in their Jackson campus	In Progress. Fiber equipment delivered Dec 2024 to support new programming at Hinds & Holmes CCs. Currently collaborating with Hinds CC on design/development of new Jackson campus training facility focused on information infrastructure (mult funding streams, including fed, state, local, AWS, potentially other contractors). Additional opportunities for equipment support pending future
Vangaurd Programs			
Regional workforce Supply+Demand analysis with Econ Dev/WFD leaders	AWS supplies a Labor market analysis locally to identify the demand that will be required to build/run/power data center infrastructure and the supply of labor that currently exists, in order to find gaps that should be addressed via new and expanded programs at Education and WFD providers in the region. This information has been helpful to community leaders (government, economic development, edu) to guide their strategic planning	AccelerateMS	Complete. March 2024. This helps local economic development, workforce and edu leaders understand the depth and breadth of the demand for talent and the gaps in the supply. Informs our collaboration with local system.
Workforce Leadership Kickoff at AWS location	Convening of EDU/WFD leaders from a new region in an existing infra region, including tour of existing DC and meetings with infra leaders. Helps edu/wfd leaders connect with AWS leaders and better understand infra related talent demands at AWS and our contractors.	AccelerateMS	Complete. March 2024 - cohort of 26 leaders from MS participated in convening at Amazon HQ1 and our PDX region. Fostered connections with AWS leaders and their counterparts in another AWS infra community; helps expose MS leaders to the scope/scale of AWS builds. Appendix B.
Information Infrastructure Workshop (I2W) for Educators	Professional development opportunity for edu/wfd professionals to learn about talent pipelines into cloud infrastructure through through hands-on, immersive experiences and direct engagement with employers (AWS and our network of vendors/contractors)	AccelerateMS	Complete. Aug 2024 - supported statewide edu/workforce conference for 700+ attendees across MS. For example, engaged our contractor network to drive employer engagement (increase from ~20 in 2023 to 150+ employer reps in 2024). Appendix C.
Fiber Optic Fusion Splicing 2-day workshop	Two-day workshop to learn about fiber optic technology and network infrastructure from experts at AWS, Sumitomo Electric Lightwave, and other	Holmes CC, Hinds CC	Complete. May 2024 - 30 graduates of 2-day course hosted at Holmes Community College. Potential for more with planned expansion.
Fiber Optic Technician Micro course 1/2 day	4-hour workshop for K-12 students to learn foundational skills in fiber optics through hands-on labs and engagement with experts in the industry.	Holmes CC, Hinds CC, The Bean Path, Madison County Public Schools	Complete. May 2024. Hosted two 4-hour workshops to build exposure at The Bean Path (Jackson) and Madison Cty Career & Technical Center. Potential for more with planned expansion.
Capacity Building Programs			
Information Infrastructure Pre-Apprenticeship (I2PA)	120-hour pre-apprenticeship designed for job-seekers with little/no prior experience to launch their skilled trade careers related to cloud infrastructure. Successful completers earn industry-recognized credentials and are connected with AWS HMs/contractors. Addresses shortages in the skilled	Holmes CC	Complete. Dec 2024 and Jun 2025. 41 graduates of 4-week program, over 90% were interviewed by AWS for ops roles. At least 2 more cohorts planned for 2025, including pilot of high school CTE pathway (this pushed to Jan. 2026) that will be model for national scale. Appendix D.
Advanced Module Series (MEP, Controls, Structured Cabling)	AWS will support purpose-built instructional modules designed to address the most in-demand skills related to Data Center construction and operations, co-developed with subject-matter experts, contractors, trade groups, and industry-training providers (like NCCER). Instructors will be industry professionals and finishers will earn industry-recognized certifications.	TBD - likely contractors and subs	**In Progress. Currently under development, target launch 2H'2025.**
Fiber Optic Tech Certificate	Certificate program with state-of-the-art fiber technology that will yield in-demand certifications and help learners launch careers in fiber and telecom industrie	AccelerateMS; Holmes CC, Hinds CC	In Progress. New 40-hour fiber install tech certificate launched at Hinds CC (1st cohort finished in Mar 2025); Holmes CC (1st cohort finished May 2025). AWS has provided support with curriculum development, faculty training, and grant to purchase state-of-the-art lab equipment for hands-on training (co-funded by AWS, AccelerateMS, Central MS PPD).
Data Center Operations Programs	Upskilling program to utilize community college coursework to move DCC builders (i.e. current AWS employees in infra delivery, logistics, etc.) into high-demand roles, with special emphasis on L3 DCO/DCEO. Funded through Amazon Career Choice.	Holmes CC / Hinds CC (TBC)	In Progress. New certificate programs aligned with AWS/industry demand, target launch 2H'2025. Similar to fiber program above, AWS provides support with curriculum development, faculty training, and state-of-the-art lab equipment for hands
DC Engineering Design Program with 4-year college	AWS subject matter experts help faculty create senior research projects that focus on data center electrical (including power/clean energy) and mechanical engineering with AWS mentors, then expand to concentrations in ME and EE departments.	MS State conversations have begun - depending on RFA	In Progress. School Year 25-26 - capstones, program design, approval by faculty committee; SY 26-27 launch. Similar to program at George Mason, AWS provides curriculum/content SMEs to align to industry demand, faculty development, and
Cloud Computing Program Implementations (Academy, MLU, re/Start, Educate)	Support for education institutions and independent learners with free, ready-to-learn cloud computing curriculum that works backwards from employer demand for specific skills and roles in AI/ML, software development, data integration, among other in-demand cloud computing skills.	MS State, Jackson State, Tougaloo, Holmes, Hinds (5 others applied for RFA from MDA and Accelerate - decisions in March 2025)	In Progress. Two dimensions: 1) collaboration with AccelerateMS and MDA to issue RFI to support AI innovation across MS university system, which will launch later this year and will include AWS support, including AWS Educate, Academy, Skill Builder, and bespoke collaboration with the Governor's AI Innovation Hub. 2) AWS/AccelerateMS/MDA AI RFA process delivered $10M into Higher Education
K-12 Program Capacity Grants	Middle school program built collaboratively with AWS and Airbus to exposes students to high-demand careers through hands-on learning in design/3D printing, hand/power tools, electricity, fiber, and leadership principles. WWBIB is similar to above, but	Canton SD, Madison PS, Jackson PS	Complete and In Progress. Initial Seed Grants of May 2024 $230k, with AccelerateMS matching $200k; launched for WBIB for all 8th graders in Madison County (MPS and CSD); WWBIB for all 1-5 graders in MPS and 4 pilot locations in JPS. Total impact: 55

Exhibit 1C

Category	Program		Headline and Talking Point(s)	Est. Unit Cost (total)
Facilities & Equipment	Amazon CWA / Mobile Training Center		AWS Launches Mobile Training Campuses to expand access to "blue-collar tech" training in communities AWS partners with community colleges to increase workforce opportunities related to cloud infrastructure - The program will focus on the most in-demand jobs supporting the fast-growing cloud computing industry. The training will be tailored to the blue-collar tech jobs that build, connect, power, operate and maintain the physical infrastructure that supports the internet and cloud computing. These include hands-on roles in data centers, fiber optic cabling, as well as skilled trades (e.g., electricians, HVAC technicians). - The program will include hands-on learning in mobile labs filled with cutting edge technology, housed on or near data center construction sites to support the learning of community members as well as on-going professional growth of incumbent workers lookine to upskill.	$6,000,000
	Sustainable Energy Lab		XXX Univ and AWS collaborate on Renewable Energy Lab and Sustainable Data Center Engineering concentration The new concentration in sustainable data center engineering will focus on renewable energy generation, storage, and distribution training and hands-on experience. The course builds upon the Data Center Engineering course launched last year that develops student expertise in data center infrastructure design, operations, efficiency, cooling, and decarbonization. With advanced equipment and software tools funded by AWS, Mason's new Renewable Energy Lab will allow students to explore, analyze, and simulate data related to renewable energy sources as well as the complex design and operation of microgrids. The lab will replicate real-world equipment, such as power grids, wind power plants, and other renewable energy sources.	$350,000
	AWS Equipment Donation Program		The AWS Equipment Donation Program provides surplus and decommissioned data center equipment and computing hardware (e.g. laptops) to education, training, and nonprofit organizations. Donating this equipment to education and training orgs, helps to train the next generation of builders, creating value out of decomissioned equipment.	N/A
	Blue-Collar Tech Equipment Package		AWS outfits local schools with state-of-the-art equipment to support "blue-collar tech" training. - This equipment will provide hands-on learning opportunities that are critical to the skills required to build, connect and operate data centers. This includes training equipment to develop skills related to server racks and structured cabling; electrical systems; motor controls; fiber splicing, testing and termination equipment; data center power line-ups; and HVAC trainers. - These donations will be made to local education institutions in order to ensure their alignment to industry demands and technology of today and tomorrow.	
	Regional workforce Supply=Demand analysis with Econ Dev/WFD leaders		AWS supplies a Labor market analysis locally to identify the demand that will be required to build/run/power data center infrastructure and the supply of labor that currently exists, in order to find gaps that should be addressed via new and expanded programs at Education and WFD providers in the region. This information has been helpful to community leaders (government, economic development, edu) to guide their strategic planning and program development efforts.	$10,000
	Workforce Leadership Kickoff at AWS location		Workforce and education leaders convene at Amazon to kick off regional collaboration - presidents, superintendents and cabinet-level leaders from universities, community colleges, K-12 school districts and other regional workforce leaders met with Amazon infra leaders to foster connections and catalyze more effective collaboration - the agenda included round table discussions in which AWS infra business leaders (e.g. construction, ops, fiber) introduced their teams and asked for support in addressing the tremendous demand for talent in the region. - leaders from XXX also had the opportunity to introduce Amazonian leaders to their community to better understand the existing community infrastructure to address	$15,000
Early-Stage, Vanguard	Information Infrastructure Workshop (I2W) for Educators		AWS Information Infrastructure Workshop (I2W) for Education & Workforce Leaders is a professional development opportunity designed to help educators and workforce development professionals supercharge their efforts to expand talent pipelines into high-demand career opportunities related to cloud infrastructure. During AWS I2W, education and workforce leaders learn about the broad array of career pathways related to cloud infrastructure through hands-on, immersive experiences and engage directly with with employers (AWS and our network of vendors/contractors) so they can, in turn, connect job-seekers with careers that support family-sustaining incomes.	$25,000
	Fiber Optic Fusion Splicing 2-day workshop		- Learners and job-seekers will have the opportunity to learn about fiber optic technology, cabling and network infrastructure from experts at AWS, engineers at Sumitmomo Electric Lightwave, and industry professionals. This event is free to learners and open to those 'ready to work', interested in strengthening current skills and abilities in fiber optic technology and fusion splicing. The training program concludes with an employer networking fair, where learners will have the opportunity to begin career discussions with local and national fiber employers.	$20,000
	Fiber Optic Technician Micro course 1/2 day		- The AWS Fiber Optic Fusion Splicing Micro Course, offers attendees a chance to learn foundational skills in fiber optics through hands-on labs, and engagement with experts in the industry. Additionally, attendees learn about opportunities to continue their training in the field of fiber optics.	$5,000
	Information Infrastructure Workshop (I2W) for Learners & Families		AWS Information Infrastructure Workshop (I2W) for Learners and Job-Seekers is a half-day workshop designed to help students, job-seekers, and their families learn about high-demand career opportunities related to cloud infrastructure. During AWS I2W, learners and job-seekers will broaden their understanding of infra-related careers through through hands-on, immersive experiences. They will also have an opportunity to meet directly with with employers (AWS and our network of vendors/contractors) to help launch or advance their careers.	$50,000
	Community Colleges	Information Infrastructure Pre-Apprenticeship (I2PA)	- AWS Information Infrastructure Pre-Apprenticeship ("I2PA") is a 4-week, 120-hour paid pre-apprenticeship designed for students and job-seekers with a high school diploma or equivalent to prepare for entry into any one of several careers that build, connect, power, and operate the infrastructure of the information economy. Built around authentic, hands-on experiences taught by industry professionals, AWS I2PA covers safety, essential workplace skills, and basic electrical, mechanical, fiber-optic, and operations. Those who successfully complete the program will earn industry-recognized credentials and a guaranteed interview with AWS or one of our contractors	$175,000
	Community Colleges	Advanced Module Series (MEP, Controls, Structured Cabling)	AWS will support purpose-built instructional modules designed to address the most in-demand skills related to Data Center construction and operations, co-developed with subject-matter experts, contractors, trade groups, and industry-training providers (like NCCER). Instructors will be industry professionals and finishers will earn industry-recognized certifications.	$250,000
	Community Colleges	Fiber Optic Tech Certificate		$285,000
	Community Colleges	Renewable Energy Short Form Certificate Program (SHINE)	AWS will collaborate with XXXX colleges to support the development and implementa AWS and SHINE, a non-profit org dedicated to building the solar workforce, along with renewable energy developers, are collaborating to bring SHINE cohorts to local Community Colleges timed to when solar talent is locally in-demand. SHINE provides career pathways for individuals from all backgrounds to embark on rewarding careers with family sustaining incomes in the booming solar industry through a 2-day program with hands-on training and direct connections with employment opportunities. Aligning SHINE cohorts to utility scale solar projects ensures the benefits of these solar projects are optimized locally, creating pathways for Virginians to access these jobs and build sustainable solar careers. As graduates complete the SHINE program, they have opportunities to interview with leading solar developers and construction companies with local employment opportunities	$100,000
	Community Colleges / Training Org	Renewable Energy/Clean Tech Medium-Form Program: Clean Tech Accelerator	AWS is working to scale the recently launched Clean Tech Accelerator (CTA), an Accenture and Goodwill program. AWS is considering investing in the CTA to help accelerate training of entry-level junior solar and storage installers. CTA program details are attached, but in summary, Goodwill provides wrap-around services and learners complete 4 weeks of solar+ storage training (all trainees earn OSHA-10, CPR/ First Aid, Construction Basics, Iron Ridge Installation Certifications, GRID Alternatives Installation Basics Training Certification). Other potential cohorts we	$100,000
Capacity Building programs	Community Colleges	DCEO Upskilling with Amazon Career Choice	AWS will collaborate with local community colleges, universities and other educational organizations to help align their academic and workforce programming to the growing number of data center and related cloud infrastructure roles. This will include supporting the development of short- and long- term training programming. Support from AWS will include: 1) subject matter expertise to align curriculum to employer demands, 2) faculty training around data center operations functions (e.g. role mapping sessions), 3) cutting-edge data center training equipment and hands-on learning environments, and 4) facilitating collaboration with other educational institutions	$200,000
	4-year univ	DC Engineering Design Program with 4-year college	XXX University educates faculty and students at scale on skills needed for data center and cloud engineering jobs. In partnership with Amazon, XXX has created senior research projects that focus on data center electrical (including power/clean energy) and mechanical engineering problems of practice. These are intended to be yearlong research projects that can be implemented year after year to get students working on data centers-related content with AWS mentorship and support. In addition, XXX and AWS will collaboratively increase diversity of tech talent pipeline across DMV through collaborations with XXX Community College and other WFD agencies - and establish predictable hiring mechanisms. In addition, AWS Subject Matter Experts will support the creation of new Data-Centers-focused coursetakings in the Electrical and Mechanical Engineering Departments	$20,000
	4-year univ	Concierge Cloud Computing Service (Academy, MLU, re/Start)	Support for education institutions and independent learners with free, ready-to-learn cloud computing curriculum that works backwards from employer demand for specific skills and roles in AI/ML, software development, data integration, among other in-demand cloud computing skills. This builds on the AWS commitment to provide free cloud skills training to 29 million people globally. AWS Academy provides higher education institutions with a ready-to-teach cloud computing curriculum that prepares students to pursue industry-recognized certifications and in-demand cloud jobs. AWS Academy courses help students develop in-demand cloud computing skills by providing hands-on experience in the AWS Cloud and lessons based on actual industry scenarios. AWS Academy courses and learning resources are aligned to industry-recognized AWS Certification. AWS Educate offers hundreds of free, self-paced online training resources and the opportunity for hands-on practice on the AWS Console. Designed specifically for the new-to-the-cloud learner, AWS Educate provides simple, barrier-free access to learn, practice, and evaluate your cloud skills without creating an Amazon or AWS account. Follow personalized content recommendations to earn badges that demonstrate your skills, search the job board to find employers looking to hire for in-demand roles, and Amazon has created an engaging experience for k-12 students to get inside an AWS Data Center to help them visualize how a data center works and to highlight the variety of career pathways related to cloud infrastructure. Amazon will provide	$25,000
	K-12	AFE Virtual Data	Forgetted support for k12 instructors to bring this learning experience into their	$25,000
	K-12	I2C2 (Information	AWS launches fund to help bring "hands-on" STEAM learning experiences to elementary, middle and high school students. - AWS I2C2 (Information Infrastructure Community Capacity) grants [name TBD] will catalyze STEAM education in K-12 systems in our infrastructure communities. The fund will provide strategic capacity-building grants to K-12 school systems to support implementation of best-in-class STEAM programs, such as We Build it Better and NCCER Core, that provide industry-designed "hands-on" learning experiences for students in elementary, middle and high school. The grants will foster interest and develop skills in STEAM fields that have a "hands-on" component from an early age, preparing students for future careers in these dynamic and rapidly evolving sectors.	$500,000

Exhibit 1C

From:	Holliday, Mariana[redacted]
Sent:	Tue 9/2/2025 12:55:38 PM (UTC-04:00)
To:	Lee-Romagnolo, Nicholas[redacted] Jernigan, Quin[redacted]
Cc:	Berman, Mike[redacted] Affrunti, Christopher[redacted] Thompson, Jessica [C][redacted]
Subject:	[External] AWS Regional Convening Roster and Picture
Attachment:	amazon_regionalworkforce_group photo day 2.JPG

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Hi everyone,

I hope you all had a lovely holiday weekend! We are still invigorated by our time together last week. Here is a sneak peak of one of the group photos taken by our photographer Pete. In the coming days, I will send a re-cap of the event, more photos, a final roster with contact information, and any action items coming out of our time together.

ACTION: Please respond to this email by COB Wednesday 9/3 if you do NOT want to be included in the final roster to be shared with the group. The following information will be shared in the roster (Name, Organization, Title, Email Address).

Cheers,

THE AWS Workforce Development Team (Mari, Quin, Nick, Mike, and Chris)

Exhibit 1C



Exhibit 1C

From:	Holliday, Mariana[redacted]
Sent:	Thur 9/4/2025 1:40:53 AM (UTC-04:00)
To:	Lee-Romagnolo, Nicholas[redacted] Jernigan, Quin[redacted]
Subject:	[External] AWS Regional Leadership Kickoff - Thank You and Resources
Attachment:	Full Event Roster - AWS Regional Workforce Launch Aug 2025.pdf
Attachment:	Regional Workforce Leadership Kickoff_August 2025.pdf
Attachment:	Regional Workforce Leadership Kickoff_August 2025.pdf
Attachment:	Full Event Roster - AWS Regional Workforce Launch Aug 2025.pdf
Attachment:	Regional Workforce Leadership Kickoff_August 2025.pdf

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Dear Regional Leadership Kickoff Participants.

We would like to express our sincere gratitude for your participation in our two-day AWS Regional Workforce Development Leadership Kickoff at Amazon HQ2 on August 27-28, 2025. Your engagement and contributions from across our Georgia, Philadelphia, and North Carolina regions helped made this a truly collaborative and productive session.

The comprehensive agenda - from touring the AWS Data Center construction site and NOVA's Data Center Learning Lab to the insightful discussions with AWS infrastructure leaders - provided valuable insights into our shared workforce development challenges and opportunities. Your active participation in the regional breakout sessions and strategic planning discussions was particularly valuable in helping us begin to map out future collaboration pathways.

Key highlights from our time together included:

- First-hand exposure to AWS data center operations and construction
- Engaging career panel discussions
- Productive dialogue with AWS infrastructure leadership
- Regional strategic planning sessions
- Valuable networking opportunities across three major regions

Attached/linked to this email are the following:

- Final Participant Roster with contact information for continued cross-regional collaboration
- PPT slide deck from day 2 sessions
- Link to photos for you to post to social media, share with your colleagues, or keep as a memory of our shared time together. Please tag us @ #AWSworkforce #AWS

In the coming weeks, your regional lead with follow up with:

- Next steps for implementing the discussed initiatives
- Follow-up action items from the regional breakout sessions

Once again, thank you for investing your time and expertise in this important initiative. We look forward to continuing our work together to develop strong talent pipelines across our regions!

Cheers,

The AWS Workforce Development Team (Mari, Quin, Nick, Mike, and Chris)

P.S. Special thanks to those who participated in the optional HQ2 tour and networking reception - these informal discussions were equally valuable in strengthening our cross-regional partnerships.

Exhibit 1C

Full Event Roster - AWS Regional Workforce Launch Aug 2025.xlsx

Confidential - Not for distribution

First	Last	Organization	Title	Email
GEORGIA STAKEHOLDERS				
Mark	Peevy	Technical College System of Georgia	Chief of Staff	[redacted]
Breezy	Straton	Elevate Douglas	Vice President of Economic Development	[redacted]
Chris	Pumphrey	Elevate Douglas	President, Economic Development	[redacted]
Trent	North	Douglas Co Schools	Superintendent	[redacted]
Julie	Post	West GA Technical College	President	[redacted]
Kristen	Buoy	West GA Technical College	VP Academic Affairs	[redacted]
Irvin	Clark	Southern Crescent Technical College	President	[redacted]
Serra	Hall	Select Newton	Economic Development Director, Executive Director	[redacted]
Bill	Rustin	Butts County Schools	Assistant Superintendent	[redacted]
Richard	Hickmon	Southern Crescent Technical College	IDSY Program Coordinator	[redacted]
Brian	Kitchens	Select Newton	Workforce Development, Newton Co	[redacted]
Ryan	Allred	Newton College and Career Academy	STEM Program Director	[redacted]
NORTH CAROLINA STAKEHOLDERS				
Jason	Perakis	Richmond High School	Career Development Lead	[redacted]
Brent	Barbee	Richmond Community College	President	[redacted]
John	Loyak	Richmond Community College	VP of Workforce Development	[redacted]
Mike	Renne	NC Department of Public Instruction	Computer Science, IT and Technology Consultant	[redacted]
John	Wetsch	Wake Tech Community College	Instructor/Program Director, Cloud Computing-Cloud Infrastructure	[redacted]
Kathie	Sidner	University of North Carolina System	Director, Economic Development and Military Affairs	[redacted]
Cecilia	Holden	My Future NC	CEO and President	[redacted]
Angineek	Gillenwater	Richmond Community College	Director of Program Development	[redacted]
Wendy	Wallace	Richmond Community College	CTE Director	[redacted]
John	Kester	Richmond Community College	Dean of Engineering and Trades	[redacted]
PENNSYLVANIA STAKEHOLDERS				
Patrick	Jones	Bucks Community College	President and CEO	[redacted]
Shawn	Thomas	Northhampton Community College	VP for Workforce Development and Community Partnerships	[redacted]
Ken	Nasatka	Northhampton Community College	Associate Dean - Automotive, Industry, and Manufacturing	[redacted]
Kate	Shaw	Department of Higher Education	Director of Higher Ed PA	[redacted]
Carrie	Amann	Department of Higher Education	Dept Higher Ed PA	[redacted]
Judd	Pittman	Community College Commission of PA	Director of CTE PA	[redacted]
Nick	Neupauer	Community College Commission of PA	Community College Commission of Pennsylvania	[redacted]
Tuesday	Stanley	Community College Commission of PA	Community College Commission of Pennsylvania	[redacted]
John	Yudichak	Luzerne Community College	President	[redacted]
Mike	Narcavage	Luzerne Community College	Director of Workforce Development	[redacted]
Andrew	King	Luzerne Community College	Interim Dean of Science, Mathematics and Healthcare Sciences	[redacted]
Trish	Yencha	Luzerne Community College	VP IT/CIO	[redacted]
Larissa	Verta	Lehigh County Community College	VP Acad Services and Stud Development	[redacted]
Kelly	Trahan	Lehigh County Community College	Dean, Workforce Development	[redacted]
Danielle	Okai	Office of the Governor	Deputy Chief of Staff, Office of the Governer	[redacted]
Brian	Ross	PA Department of Community and Economic Development	Managing Director, Project and Account Management	[redacted]
Gwen	Ross	PA Department of Community and Economic Development	Director of Workforce Development Initiatives	[redacted]
Carol	Momijan	PA Dept of Labor and Industry	Special Advisor to the Secretary of L & I	[redacted]
James	Martini	State Workforce Board	Head of State Workforce Board	[redacted]
John	Pulver	PA Career Technical Association	Executive Director	[redacted]
Todd	Shawver	Bloomsburg University	Dean of Business School	[redacted]
Jim	Snell	UA Local 420	Business Manager	[redacted]
Brian	Stokes	Northhampton Community College	Professor - Computer Science	[redacted]
Chad	Knights	Northern Virginia Community College	Vice President, Information & Engineering Technologies and College Computing	[redacted]
JaJuana	Campbell	Virginia Community College System	Workforce Programs Coordinator	[redacted]
Sam	Northington	Virginia Community College System	VA Infrastructure Academy Coordinator, Career Education & Workforce Programs	[redacted]
Yolanda	Crewe	Virginia Community College System	Director of Operations, Career Education & Workforce Programs	[redacted]
AMAZON WEB SERVICES STAKEHOLDERS				
Mariana	Holliday	Amazon Web Services	Principal, Economic & Workforce Development (NC Workforce Lead)	[redacted]
Nick	Lee-Romagnolo	Amazon Web Services	Principal, Economic & Workforce Development (PA Workforce Lead)	[redacted]
Quin	Jernigan	Amazon Web Services	Manager, Economic & Workforce Development (GA Workforce Lead)	[redacted]

First	Last	Organization	Title	Email
Mike	Berman	Amazon Web Services	Director, Economic & Workforce Development	[redacted]
Jessica	Thompson	Amazon Web Services	Workforce Business Analyst	[redacted]
Bill	Baum	Amazon Web Services	Manager of Construction (GA Construction Lead)	[redacted]
Morgan	O'Connor	Amazon Web Services	Manager of Construction (NC Construction Lead)	[redacted]
Sanath	Kalidas	Amazon Web Services	Manager of Construction (PA Construction)	[redacted]
Kunal	Giridihar	Amazon Web Services	Senior Fiber Engineer	[redacted]
Nick	Lutz	Amazon Web Services	Network Infra Deployment Manager	[redacted]
Yesudas	Purathur Josetom	Amazon Web Services	Cluster Operations Leader (GA Ops Lead)	[redacted]
Ryan	Kehoe	Amazon Web Services	Cluster Operations Leader (PA Ops Lead)	[redacted]
Joy	Wang	Amazon Web Services	Communications Specialist	[redacted]
CONTRACTOR REPRESENTATIVES				
Kim	Cunningham	Walbridge	Senior Manager, Supplier Diversity	[redacted]
Usaamah	Muhammed	Walbridge	Senior Project Engineer	[redacted]
Wes	Perry	Suffolk	Project Executive	[redacted]

Exhibit 1C

Full Event Roster - AWS Regional Workforce Launch Aug 2025.xlsx

Confidential - Not for distribution

First	Last	Organization	Title	Email
GEORGIA STAKEHOLDERS				
Mark	Peevy	Technical College System of Georgia	Chief of Staff	[redacted]
Breezy	Straton	Elevate Douglas	Vice President of Economic Development	[redacted]
Chris	Pumphrey	Elevate Douglas	President, Economic Development	[redacted]
Trent	North	Douglas Co Schools	Superintendent	[redacted]
Julie	Post	West GA Technical College	President	[redacted]
Kristen	Buoy	West GA Technical College	VP Academic Affairs	[redacted]
Irvin	Clark	Southern Crescent Technical College	President	[redacted]
Serra	Hall	Select Newton	Economic Development Director, Executive Director	[redacted]
Bill	Rustin	Butts County Schools	Assistant Superintendent	[redacted]
Richard	Hickmon	Southern Crescent Technical College	IDSY Program Coordinator	[redacted]
Brian	Kitchens	Select Newton	Workforce Development, Newton Co	[redacted]
Ryan	Allred	Newton College and Career Academy	STEM Program Director	[redacted]
NORTH CAROLINA STAKEHOLDERS				
Jason	Perakis	Richmond High School	Career Development Lead	[redacted]
Brent	Barbee	Richmond Community College	President	[redacted]
John	Loyak	Richmond Community College	VP of Workforce Development	[redacted]
Mike	Renne	NC Department of Public Instruction	Computer Science, IT and Technology Consultant	[redacted]
John	Wetsch	Wake Tech Community College	Instructor/Program Director, Cloud Computing-Cloud Infrastructure	[redacted]
Kathie	Sidner	University of North Carolina System	Director, Economic Development and Military Affairs	[redacted]
Cecilia	Holden	My Future NC	CEO and President	[redacted]
Angineek	Gillenwater	Richmond Community College	Director of Program Development	[redacted]
Wendy	Wallace	Richmond Community College	CTE Director	[redacted]
John	Kester	Richmond Community College	Dean of Engineering and Trades	[redacted]
PENNSYLVANIA STAKEHOLDERS				
Patrick	Jones	Bucks Community College	President and CEO	[redacted]
Shawn	Thomas	Northhampton Community College	VP for Workforce Development and Community Partnerships	[redacted]
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Exhibit 1C

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Usaamah	Muhammed	Walbridge	Senior Project Engineer	[redacted]
Wes	Perry	Suffolk	Project Executive	[redacted]

From: Lee-Romagnolo, Nicholas [redacted]
Sent: Thur 9/4/2025 4:31:56 PM (UTC-04:00)
To: [redacted] Shawn Thomas [redacted] Shaw, Kate [redacted] Amann, Carrie [redacted] Pittman, Judd [redacted] Iverta [redacted] Okai, Danielle [redacted] Ross, Brian [redacted] Ross, Gwen [redacted] Momjian, Carol [redacted] Martini, James [redacted] john [redacted]
Cc: Holliday, Mariana [redacted] Jernigan, Quin [redacted] Berman, Mike [redacted]
Subject: [External] RE: AWS Regional Leadership Kickoff - Thank You and Resources
Attachment: MS.Simple.Regional.WFD.Implementation.Plan - for Convening.xlsx
Attachment: Sample Lightcast Job Titles.xlsx

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.*

Hello PA Colleagues,

It was truly special to have you all with us last week. THANK YOU! And, just so that you all have it one place, I have added two spreadsheets here - the list of jobs I shared with you and the basic explanations of programs and overall cost of programs/equipment.

Thank you all – and we look forward to the work,

Nick

From: Holliday, Mariana <[redacted]
Sent: Thursday, September 4, 2025 1:41 AM
To: Lee-Romagnolo, Nicholas <[redacted] Jernigan, Quin <[redacted]
Subject: AWS Regional Leadership Kickoff - Thank You and Resources

Dear Regional Leadership Kickoff Participants.

Exhibit 1C

We would like to express our sincere gratitude for your participation in our two-day AWS Regional Workforce Development Leadership Kickoff at Amazon HQ2 on August 27-28, 2025. Your engagement and contributions from across our Georgia, Philadelphia, and North Carolina regions helped made this a truly collaborative and productive session.

The comprehensive agenda - from touring the AWS Data Center construction site and NOVA's Data Center Learning Lab to the insightful discussions with AWS infrastructure leaders - provided valuable insights into our shared workforce development challenges and opportunities. Your active participation in the regional breakout sessions and strategic planning discussions was particularly valuable in helping us begin to map out future collaboration pathways.

Key highlights from our time together included:

- First-hand exposure to AWS data center operations and construction
- Engaging career panel discussions
- Productive dialogue with AWS infrastructure leadership
- Regional strategic planning sessions
- Valuable networking opportunities across three major regions

Attached/linked to this email are the following:

- Final Participant Roster with contact information for continued cross-regional collaboration

- PPT slide deck from day 2 sessions

- Link to photos for you to post to social media, share with your colleagues, or keep as a memory of our shared time together. Please tag us @ #AWSworkforce #AWS

In the coming weeks, your regional lead with follow up with:

- Next steps for implementing the discussed initiatives
- Follow-up action items from the regional breakout sessions

Once again, thank you for investing your time and expertise in this important initiative. We look forward to continuing our work together to develop strong talent pipelines across our regions!

Cheers,

The AWS Workforce Development Team (Mari, Quin, Nick, Mike, and Chris)

P.S. Special thanks to those who participated in the optional HQ2 tour and networking reception - these informal discussions were equally valuable in strengthening our cross-regional partnerships.

Exhibit 1C

Program	Description	Anchor Partner	Status Update May 2025
Facilites and Equipment			
Amazon Community Workforce Accelerator (brick and mortar training facility)	Full-scale Information Infrastructure training center with flexible learning labs and state-of-the-art data center/infra technology. Will also have community gathering spaces to serve as "doorstep" of our local investment.	AccelerateMS; Holmes & Hinds CCs; Madison, Jackson & Canton SDs; Central MS Planning & Dev District; MS State Univ	In Progress. Program phase complete, currently in architectural design phase with multiple AWS teams (e.g. Construction, Ops, Security, Fiber). Target build 2H 2025/1H 2026.
JAN100 Mobile Training Campus ("MTC")	Campuses include hands-on learning in mobile labs filled with cutting edge technology, housed on or near data center construction sites and community college campuses to support entry-level pipelines as well as incumbent worker upskilling for skilled trade and DC	AccelerateMS; Holmes & Hinds CCs; Madison, Jackson & Canton SDs; Central MS Planning & Dev District; Yates Construction	In Progress. Expected completion Q3 2025. Plans in place to host initial programs in collab with local high schools and community colleges (see I2PA below), as well as training for incumbent contractors.
Sustainable Energy Lab	Advanced equipment and software tools, the Renewable Energy Lab will allow students to explore, analyze, and simulate data related to renewable energy sources as well as the complex design and operation of microgrids. This lab is necessary for University-level design engineering (electrical and	AccelerateMS; MS State (TBC)	In Progress. Early stage scoping with MS State, in conjunction with state RFI for AI workforce dev program ($10M grant program AccelerateMS and MDA will offer to support AI innovation in MS). Targeting potential launch 2026.
AWS Equipment Donation Program	Provides surplus and decommissioned data center equipment and computing hardware through collaboration with AWS Reverse Logistics (RL) team.	Holmes & Hinds CCs; Madison, Jackson & Canton SDs; Jackson State	Launched/Ongoing. Laptops donated May 2024. Targeting Q3 2025 for next traunch of DC equipment in conjunction with launch of MTC Q2 2025.
Blue-Collar Tech Equipment Package	Training equipment to provide hands-on learning opportunities that are critical to the skills required to build, connect and operate data centers, e.g. server racks and structured cabling; electrical systems; motor controls; fiber splicing, testing and termination equipment; data center power line-ups; and HVAC trainers.	AccelerateMS / CMPPD (consortium of schools to purchase equipment) - Hinds CC is initial focus for new BCT building in their Jackson campus	In Progress. Fiber equipment delivered Dec 2024 to support new programming at Hinds & Holmes CCs. Currently collaborating with Hinds CC on design/development of new Jackson campus training facility focused on information infrastructure (mult funding streams, including fed, state, local, AWS, potentially other contractors). Additional opportunities for equipment support pending future
Vangaurd Programs			
Regional workforce Supply+Demand analysis with Econ Dev/WFD leaders	AWS supplies a Labor market analysis locally to identify the demand that will be required to build/run/power data center infrastructure and the supply of labor that currently exists, in order to find gaps that should be addressed via new and expanded programs at Education and WFD providers in the region. This information has been helpful to community leaders (government, economic development, edu) to guide their strategic planning	AccelerateMS	Complete. March 2024. This helps local economic development, workforce and edu leaders understand the depth and breadth of the demand for talent and the gaps in the supply. Informs our collaboration with local system.
Workforce Leadership Kickoff at AWS location	Convening of EDU/WFD leaders from a new region in an existing infra region, including tour of existing DC and meetings with infra leaders. Helps edu/wfd leaders connect with AWS leaders and better understand infra related talent demands at AWS and our contractors.	AccelerateMS	Complete. March 2024 - cohort of 26 leaders from MS participated in convening at Amazon HQ1 and our PDX region. Fostered connections with AWS leaders and their counterparts in another AWS infra community; helps expose MS leaders to the scope/scale of AWS builds. Appendix B.
Information Infrastructure Workshop (I2W) for Educators	Professional development opportunity for edu/wfd professionals to learn about talent pipelines into cloud infrastructure through through hands-on, immersive experiences and direct engagement with employers (AWS and our network of vendors/contractors)	AccelerateMS	Complete. Aug 2024 - supported statewide edu/workforce conference for 700+ attendees across MS. For example, engaged our contractor network to drive employer engagement (increase from ~20 in 2023 to 150+ employer reps in 2024). Appendix C.
Fiber Optic Fusion Splicing 2-day workshop	Two-day workshop to learn about fiber optic technology and network infrastructure from experts at AWS, Sumitomo Electric Lightwave, and other	Holmes CC, Hinds CC	Complete. May 2024 - 30 graduates of 2-day course hosted at Holmes Community College. Potential for more with planned expansion.
Fiber Optic Technician Micro course 1/2 day	4-hour workshop for K-12 students to learn foundational skills in fiber optics through hands-on labs and engagement with experts in the industry.	Holmes CC, Hinds CC, The Bean Path, Madison County Public Schools	Complete. May 2024. Hosted two 4-hour workshops to build exposure at The Bean Path (Jackson) and Madison Cty Career & Technical Center. Potential for more with planned expansion.
Capacity Building Programs			
Information Infrastructure Pre-Apprenticeship (I2PA)	120-hour pre-apprenticeship designed for job-seekers with little/no prior experience to launch their skilled trade careers related to cloud infrastructure. Successful completers earn industry-recognized credentials and are connected with AWS HMs/contractors. Addresses shortages in the skilled	Holmes CC	Complete. Dec 2024 and Jun 2025. 41 graduates of 4-week program, over 90% were interviewed by AWS for ops roles. At least 2 more cohorts planned for 2025, including pilot of high school CTE pathway (this pushed to Jan. 2026) that will be model for national scale. Appendix D.
Advanced Module Series (MEP, Controls, Structured Cabling)	AWS will support purpose-built instructional modules designed to address the most in-demand skills related to Data Center construction and operations, co-developed with subject-matter experts, contractors, trade groups, and industry-training providers (like NCCER). Instructors will be industry professionals and finishers will earn industry-recognized certifications.	TBD - likely contractors and subs	**In Progress. Currently under development, target launch 2H'2025.**
Fiber Optic Tech Certificate	Certificate program with state-of-the-art fiber technology that will yield in-demand certifications and help learners launch careers in fiber and telecom industrie	AccelerateMS; Holmes CC, Hinds CC	In Progress. New 40-hour fiber install tech certificate launched at Hinds CC (1st cohort finished in Mar 2025); Holmes CC (1st cohort finished May 2025). AWS has provided support with curriculum development, faculty training, and grant to purchase state-of-the-art lab equipment for hands-on training (co-funded by AWS, AccelerateMS, Central MS PPD).
Data Center Operations Programs	Upskilling program to utilize community college coursework to move DCC builders (i.e. current AWS employees in infra delivery, logistics, etc.) into high-demand roles, with special emphasis on L3 DCO/DCEO. Funded through Amazon Career Choice.	Holmes CC / Hinds CC (TBC)	In Progress. New certificate programs aligned with AWS/industry demand, target launch 2H'2025. Similar to fiber program above, AWS provides support with curriculum development, faculty training, and state-of-the-art lab equipment for hands
DC Engineering Design Program with 4-year college	AWS subject matter experts help faculty create senior research projects that focus on data center electrical (including power/clean energy) and mechanical engineering with AWS mentors, then expand to concentrations in ME and EE departments.	MS State conversations have begun - depending on RFA	In Progress. School Year 25-26 - capstones, program design, approval by faculty committee; SY 26-27 launch. Similar to program at George Mason, AWS provides curriculum/content SMEs to align to industry demand, faculty development, and
Cloud Computing Program Implementations (Academy, MLU, re/Start, Educate)	Support for education institutions and independent learners with free, ready-to-learn cloud computing curriculum that works backwards from employer demand for specific skills and roles in AI/ML, software development, data integration, among other in-demand cloud computing skills.	MS State, Jackson State, Tougaloo, Holmes, Hinds (5 others applied for RFA from MDA and Accelerate - decisions in March 2025)	In Progress. Two dimensions: 1) collaboration with AccelerateMS and MDA to issue RFI to support AI innovation across MS university system, which will launch later this year and will include AWS support, including AWS Educate, Academy, Skill Builder, and bespoke collaboration with the Governor's AI Innovation Hub. 2) AWS/AccelerateMS/MDA AI RFA process delivered $10M into Higher Education
K-12 Program Capacity Grants	Middle school program built collaboratively with AWS and Airbus to exposes students to high-demand careers through hands-on learning in design/3D printing, hand/power tools, electricity, fiber, and leadership principles. WWBIB is similar to above, but	Canton SD, Madison PS, Jackson PS	Complete and In Progress. Initial Seed Grants of May 2024 $230k, with AccelerateMS matching $200k; launched for WBIB for all 8th graders in Madison County (MPS and CSD); WWBIB for all 1-5 graders in MPS and 4 pilot locations in JPS. Total impact: 55

Exhibit 1C

Category	Program		Headline and Talking Point(s)	Est. Unit Cost (total)
Facilities & Equipment	Amazon CWA / Mobile Training Center		AWS Launches Mobile Training Campuses to expand access to "blue-collar tech" training in communities AWS partners with community colleges to increase workforce opportunities related to cloud infrastructure - The program will focus on the most in-demand jobs supporting the fast-growing cloud computing industry. The training will be tailored to the blue-collar tech jobs that build, connect, power, operate and maintain the physical infrastructure that supports the internet and cloud computing. These include hands-on roles in data centers, fiber optic cabling, as well as skilled trades (e.g., electricians, HVAC technicians). - The program will include hands-on learning in mobile labs filled with cutting edge technology, housed on or near data center construction sites to support the learning of community members as well as on-going professional growth of incumbent workers lookine to upskill.	$6,000,000
	Sustainable Energy Lab		XXX Univ and AWS collaborate on Renewable Energy Lab and Sustainable Data Center Engineering concentration The new concentration in sustainable data center engineering will focus on renewable energy generation, storage, and distribution training and hands-on experience. The course builds upon the Data Center Engineering course launched last year that develops student expertise in data center infrastructure design, operations, efficiency, cooling, and decarbonization. With advanced equipment and software tools funded by AWS, Mason's new Renewable Energy Lab will allow students to explore, analyze, and simulate data related to renewable energy sources as well as the complex design and operation of microgrids. The lab will replicate real-world equipment, such as power grids, wind power plants, and other renewable energy sources.	$350,000
	AWS Equipment Donation Program		The AWS Equipment Donation Program provides surplus and decommissioned data center equipment and computing hardware (e.g. laptops) to education, training, and nonprofit organizations. Donating this equipment to education and training orgs, helps to train the next generation of builders, creating value out of decomissioned equipment.	N/A
	Blue-Collar Tech Equipment Package		AWS outfits local schools with state-of-the-art equipment to support "blue-collar tech" training. - This equipment will provide hands-on learning opportunities that are critical to the skills required to build, connect and operate data centers. This includes training equipment to develop skills related to server racks and structured cabling; electrical systems; motor controls; fiber splicing, testing and termination equipment; data center power line-ups; and HVAC trainers. - These donations will be made to local education institutions in order to ensure their alignment to industry demands and technology of today and tomorrow.	
	Regional workforce Supply+Demand analysis with Econ Dev/WFD leaders		AWS supplies a Labor market analysis locally to identify the demand that will be required to build/run/power data center infrastructure and the supply of labor that currently exists, in order to find gaps that should be addressed via new and expanded programs at Education and WFD providers in the region. This information has been helpful to community leaders (government, economic development, edu) to guide their strategic planning and program development efforts.	$10,000
	Workforce Leadership Kickoff at AWS location		Workforce and education leaders convene at Amazon to kick off regional collaboration - presidents, superintendents and cabinet-level leaders from universities, community colleges, K-12 school districts and other regional workforce leaders met with Amazon infra leaders to foster connections and catalyze more effective collaboration - the agenda included round table discussions in which AWS infra business leaders (e.g. construction, ops, fiber) introduced their teams and asked for support in addressing the tremendous demand for talent in the region. - leaders from XXX also had the opportunity to introduce Amazonian leaders to their community to better understand the existing community infrastructure to address	$15,000
Early-Stage, Vanguard	Information Infrastructure Workshop (I2W) for Educators		AWS Information Infrastructure Workshop (I2W) for Education & Workforce Leaders is a professional development opportunity designed to help educators and workforce development professionals supercharge their efforts to expand talent pipelines into high-demand career opportunities related to cloud infrastructure. During AWS I2W, education and workforce leaders learn about the broad array of career pathways related to cloud infrastructure through hands-on, immersive experiences and engage directly with with employers (AWS and our network of vendors/contractors) so they can, in turn, connect job-seekers with careers that support family-sustaining incomes.	$25,000
	Fiber Optic Fusion Splicing 2-day workshop		- Learners and job-seekers will have the opportunity to learn about fiber optic technology, cabling and network infrastructure from experts at AWS, engineers at Sumitmomo Electric Lightwave, and industry professionals. This event is free to learners and open to those 'ready to work', interested in strengthening current skills and abilities in fiber optic technology and fusion splicing. The training program concludes with an employer networking fair, where learners will have the opportunity to begin career discussions with local and national fiber employers.	$20,000
	Fiber Optic Technician Micro course 1/2 day		- The AWS Fiber Optic Fusion Splicing Micro Course, offers attendees a chance to learn foundational skills in fiber optics through hands-on labs, and engagement with experts in the industry. Additionally, attendees learn about opportunities to continue their training in the field of fiber optics.	$5,000
	Information Infrastructure Workshop (I2W) for Learners & Families		AWS Information Infrastructure Workshop (I2W) for Learners and Job-Seekers is a half-day workshop designed to help students, job-seekers, and their families learn about high-demand career opportunities related to cloud infrastructure. During AWS I2W, learners and job-seekers will broaden their understanding of infra-related careers through through hands-on, immersive experiences. They will also have an opportunity to meet directly with with employers (AWS and our network of vendors/contractors) to help launch or advance their careers.	$50,000
Capacity Building programs	Community Colleges	Information Infrastructure Pre-Apprenticeship (I2PA)	- AWS Information Infrastructure Pre-Apprenticeship ("I2PA") is a 4-week, 120-hour paid pre-apprenticeship designed for students and job-seekers with a high school diploma or equivalent to prepare for entry into any one of several careers that build, connect, power, and operate the infrastructure of the information economy. Built around authentic, hands-on experiences taught by industry professionals, AWS I2PA covers safety, essential workplace skills, and basic electrical, mechanical, fiber-optic, and operations. Those who successfully complete the program will earn industry-recognized credentials and a guaranteed interview with AWS or one of our contractors	$175,000
	Community Colleges	Advanced Module Series (MEP, Controls, Structured Cabling)	AWS will support purpose-built instructional modules designed to address the most in-demand skills related to Data Center construction and operations, co-developed with subject-matter experts, contractors, trade groups, and industry-training providers (like NCCER). Instructors will be industry professionals and finishers will earn industry-recognized certifications.	$250,000
	Community Colleges	Fiber Optic Tech Certificate		$285,000
	Community Colleges	Renewable Energy Short Form Certificate Program (SHINE)	AWS will collaborate with XXXX colleges to support the development and implementa AWS and SHINE, a non-profit org dedicated to building the solar workforce, along with renewable energy developers, are collaborating to bring SHINE cohorts to local Community Colleges timed to when solar talent is locally in-demand. SHINE provides career pathways for individuals from all backgrounds to embark on rewarding careers with family sustaining incomes in the booming solar industry through a 2-day program with hands-on training and direct connections with employment opportunities. Aligning SHINE cohorts to utility scale solar projects ensures the benefits of these solar projects are optimized locally, creating pathways for Virginians to access these jobs and build sustainable solar careers. As graduates complete the SHINE program, they have opportunities to interview with leading solar developers and construction companies with local employment opportunities	$100,000
	Community Colleges / Training Org	Renewable Energy/Clean Tech Medium-Form Program: Clean Tech Accelerator	AWS is working to scale the recently launched Clean Tech Accelerator (CTA), an Accenture and Goodwill program. AWS is considering investing in the CTA to help accelerate training of entry-level junior solar and storage installers. CTA program details are attached, but in summary, Goodwill provides wrap-around services and learners complete 4 weeks of solar+ storage training (all trainees earn OSHA-10, CPR/ First Aid, Construction Basics, Iron Ridge Installation Certifications, GRID Alternatives Installation Basics Training Certification). Other potential cohorts we	$100,000
	Community Colleges	DCEO Upskilling with Amazon Career Choice	AWS will collaborate with local community colleges, universities and other educational organizations to help align their academic and workforce programming to the growing number of data center and related cloud infrastructure roles. This will include supporting the development of short- and long- term training programming. Support from AWS will include: 1) subject matter expertise to align curriculum to employer demands, 2) faculty training around data center operations functions (e.g. role mapping sessions), 3) cutting-edge data center training equipment and hands-on learning environments, and 4) facilitating collaboration with other educational institutions	$200,000
	4-year univ	DC Engineering Design Program with 4-year college	XXX University educates faculty and students at scale on skills needed for data center and cloud engineering jobs. In partnership with Amazon, XXX has created senior research projects that focus on data center electrical (including power/clean energy) and mechanical engineering problems of practice. These are intended to be yearlong research projects that can be implemented year after year to get students working on data centers-related content with AWS mentorship and support. In addition, XXX and AWS will collaboratively increase diversity of tech talent pipeline across DMV through collaborations with XXX Community College and other WFD agencies - and establish predictable hiring mechanisms. In addition, AWS Subject Matter Experts will support the creation of new Data-Centers-focused coursetakings in the Electrical and Mechanical Engineering Departments	$20,000
	4-year univ	Concierge Cloud Computing Service (Academy, MLU, re/Start)	Support for education institutions and independent learners with free, ready-to-learn cloud computing curriculum that works backwards from employer demand for specific skills and roles in AI/ML, software development, data integration, among other in-demand cloud computing skills. This builds on the AWS commitment to provide free cloud skills training to 29 million people globally. AWS Academy provides higher education institutions with a ready-to-teach cloud computing curriculum that prepares students to pursue industry-recognized certifications and in-demand cloud jobs. AWS Academy courses help students develop in-demand cloud computing skills by providing hands-on experience in the AWS Cloud and lessons based on actual industry scenarios. AWS Academy courses and learning resources are aligned to industry-recognized AWS Certification. AWS Educate offers hundreds of free, self-paced online training resources and the opportunity for hands-on practice on the AWS Console. Designed specifically for the new-to-the-cloud learner, AWS Educate provides simple, barrier-free access to learn, practice, and evaluate your cloud skills without creating an Amazon or AWS account. Follow personalized content recommendations to earn badges that demonstrate your skills, search the job board to find employers looking to hire for in-demand roles, and Amazon has created an engaging experience for k-12 students to get inside an AWS Data Center to help them visualize how a data center works and to highlight the variety of career pathways related to cloud infrastructure. Amazon will provide	$25,000
	K-12	AFE Virtual Data	Targetted support for k12 instructors to bring this learning experience into their	$25,000
	K-12	I2C2 (Information	AWS launches fund to help bring "hands-on" STEAM learning experiences to elementary, middle and high school students. - AWS I2C2 (Information Infrastructure Community Capacity) grants [name TBD] will catalyze STEAM education in K-12 systems in our infrastructure communities. The fund will provide strategic capacity-building grants to K-12 school systems to support implementation of best-in-class STEAM programs, such as We Build it Better and NCCER Core, that provide industry-designed "hands-on" learning experiences for students in elementary, middle and high school. The grants will foster interest and develop skills in STEAM fields that have a "hands-on" component from an early age, preparing students for future careers in these dynamic and rapidly evolving sectors.	$500,000

Exhibit 1C

Job Titles
Information Infrastructure Job Titles in Search Parameters
Apprentice Electricians
Cable Installers
Cable Splicers
Cable Technicians
Carpenters/Roofers
Certified Electricians
Civil Construction Engineers
Civil Design Engineers
Civil Engineers
Commercial Construction Plumbers
Commercial Construction Project Engineers
Commercial Electricians
Commercial HVAC Service Technicians
Commercial HVAC Technicians
Commercial Journeyman Electricians
Commercial Plumbers
Commercial Roofers
Computer and Information Systems Managers
Computer Systems Architects
Computer Systems Engineers
Construction Field Supervisors
Construction Foremen
Construction Laborers
Construction Project Coordinators
Construction Project Directors
Construction Project Superintendents
Control Systems Engineers
Data Center Administrators
Data Center Engineers
Data Center Facilities Managers
Data Center Operations Managers
Data Center Operations Supervisors
Data Center Operations Technicians
Data Center Operators
Data Center Technicians
Database Administrators
Database Specialists
Diesel Power Mechanics
Drywall Contractors
Drywall Foremen
Drywall Installers
Electrical Power Engineers
Electrical Power Production Journeymen
Electrical Power Systems Engineers
Electrician Foremen
Electrician Supervisors
Electricians
Fiber Construction Engineers
Fiber Network Field Technicians
Fiber Optic Splicers
Fiber Optic Technicians
Heavy Equipment Operators
High Voltage Electricians
HVAC Building Engineers
HVAC Controls Technicians
HVAC Foremen
HVAC Installers
HVAC Journeymen
HVAC Technicians
Industrial Journeyman Electricians
Information Security Administrators
Information Security Architects
Journeyman Electricians
Journeyman HVAC Technicians
Journeyman/Master Electricians
Lead Solar Installers
Licensed Master Electricians
Licensed Plumbers
Logistics Coordinators
Logistics Managers
Logistics Specialists
Logistics Technicians
Managers of Solar Energy
Managers of Wind Energy
Master Electricians
Master Plumbers
Mechanical Engineers
Network and Computer Systems Administrators
OSP Construction Managers
Plumber Foremen
Plumbers
Plumbers/Electricians
Plumbers/Pipefitters
Plumbers/Steamfitters
Power Generation Technicians
Power Installers
Power Linemen
Power Plant Engineers
Power Plant Operators
Roofer Journeymen
Roofers
Roofers/Foremen
Security Guard Supervisors
Security Guards
Solar Electricians
Solar Installers
Solar Journeyman Electricians
Steel Workers
Structured Cabling Technicians
Wind Energy Engineers
Wind Turbine Technicians

From: Ford, Becky[redacted]

Sent: Wed 10/15/2025 10:13:27 PM (UTC-04:00)

To: Ruby, Kara[redacted] Grisham, Preston[redacted] Neasham, Duncan[redacted]

Cc: Simons, Will[redacted] Anderson, Kayla[redacted] Backover, Justin[redacted] Ickes, Penny[redacted] Ross, Brian[redacted] Okai, Danielle[redacted] Warren, Amanda[redacted] Wade, David[redacted] Madrid, Merle[redacted]

Subject: RE: [External] RE: AWS <-> PA Comms Connect / close hold

Kara,

Thank you 10/22 at 9:30am works for me. _@Grisham, Preston and @Neasham, Duncan please advise regarding your availability.

Kind regards
Becky

Becky Ford I Economic Development
AWS Infrastructure Global Expansion
E:[redacted] M: +[redacted]

-----Original Message-----
From: Ruby, Kara <[redacted]
Sent: Wednesday, October 15, 2025 3:24 PM
To: Ford, Becky <[redacted]
Cc: Simons, Will <[redacted] Anderson, Kayla <[redacted] Backover, Justin <[redacted] Ickes, Penny <[redacted] Ross, Brian <[redacted] Okai, Danielle <[redacted] Warren, Amanda <[redacted] Wade, David <[redacted]
Madrid, Merle <[redacted] Grisham, Preston <[redacted]
Subject: RE: [EXTERNAL] [External] RE: AWS <-> PA Comms Connect / close hold

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hi folks! I wanted to do a quick follow up - maybe we can look at 9:30am on Wednesday, October 22nd? Please let me know if that works.
Thank you again,
Kara

-----Original Message-----

From: Ruby, Kara
Sent: Wednesday, October 8, 2025 3:34 PM
To: Ford, Becky <[redacted]
Cc: Simons, Will <[redacted] Anderson, Kayla <[redacted] Backover, Justin <[redacted] Ickes, Penny <[redacted] Ross, Brian <[redacted] Okai, Danielle <[redacted] Warren, Amanda <[redacted] Wade, David <[redacted] Madrid, Merle <[redacted] Grisham, Preston <[redacted]
Subject: RE: [External] RE: AWS <-> PA Comms Connect / close hold

Hi Becky and team,
Could we do next Thursday, October 15th at 4pm?
If that works, I can send an invite.
Thank you,
Kara

-----Original Message-----
From: Ford, Becky <[redacted]
Sent: Tuesday, October 7, 2025 9:58 PM
To: Siger, Rick <[redacted] Ruby, Kara <[redacted]
Cc: Simons, Will <[redacted] Anderson, Kayla <[redacted] Backover, Justin <[redacted] Ickes, Penny <[redacted] Ross, Brian <[redacted] Okai, Danielle <[redacted] Warren, Amanda <[redacted] Wade, David <[redacted] Madrid, Merle <[redacted] Grisham, Preston <[redacted]
Subject: RE: [External] RE: AWS <-> PA Comms Connect / close hold

Hi Rick-

Thank you. Two updates on my end. We had very productive meetings with SRBC today and anticipate having additional water stories/partnerships to include. And, business teams confirmed we need to focus on November timeframe due to Hazelnut contractual agreement finalization and execution.

Looking forward to seeing you later this week!

Kind regards
Becky

Becky Ford I Economic Development
AWS Infrastructure Global Expansion
E: [redacted] M: +[redacted]

-----Original Message-----
From: Siger, Rick <[redacted]
Sent: Tuesday, October 7, 2025 8:15 PM

To: Ford, Becky < [redacted] Ruby, Kara < [redacted]
Cc: Simons, Will < [redacted] Anderson, Kayla < [redacted] Backover, Justin
< [redacted] Ickes, Penny < [redacted] Ross, Brian < [redacted] Okai, Danielle
< [redacted] Warren, Amanda < [redacted] Wade, David < [redacted]
Madrid, Merle < [redacted] Grisham, Preston < [redacted]
Subject: RE: [EXTERNAL] [External] RE: AWS <-> PA Comms Connect / close hold

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hi Becky –

Thanks so much for getting back and sorry for a delayed response after a long day.

The request is for an in-person event, ideally at one of the SITES (I am partial to Hazelnut given its larger and a fast track site).

I'll let my Governor's office colleagues chime in on the October 17 date and of course we understand there continue to be active conversations that will impact timing.

To get a call on the books, I'm adding the great Kara Ruby; let's try to find 30 minutes this week to advance the conversation.

Best,

Rick

From: Ford, Becky < [redacted]
Date: Monday, October 6, 2025 at 5:59 PM
To: Siger, Rick < [redacted]
Cc: Simons, Will < [redacted] Anderson, Kayla < [redacted] Backover, Justin
< [redacted] Ickes, Penny < [redacted] Ross, Brian < [redacted] Okai, Danielle
< [redacted] Warren, Amanda < [redacted] Wade, David < [redacted]
Madrid, Merle < [redacted] Grisham, Preston < [redacted]
Subject: [External] RE: AWS <-> PA Comms Connect / close hold

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook. <https://www.pa.gov/content/dam/copapwp-pagov/en/oa/documents/documents/cofense-report-phishing-user-guide.pdf>

+Merle and Preston

Rick,

Thank you. I made a few notes in red below. Would it be possible to confirm if the request is for a press release only, or an organized event? As mentioned in our previous conversation there a few contractual issues that determine our timeline for a public announcement.

We should definitely get on a call to keep working the details, I will have an update on timeline by 12pm tomorrow.

Kind regards

Becky

Becky Ford I Economic Development

AWS Infrastructure Global Expansion

E: [redacted] M: +[redacted]

-----Original Message-----
From: Siger, Rick <[redacted]
Sent: Monday, October 6, 2025 12:45 PM
To: Ford, Becky <[redacted]
Cc: Simons, Will <[redacted] Anderson, Kayla <[redacted] Backover, Justin <[redacted] Ickes, Penny <[redacted] Ross, Brian <[redacted] Okai, Danielle <[redacted] Warren, Amanda <[redacted] Wade, David <[redacted]
Subject: [EXTERNAL] AWS <-> PA Comms Connect / close hold

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Exhibit 1C

Hi Becky –

I hope you are well, and I'm looking forward to seeing you in Berwick later this week.

As discussed late last week, I'm connecting you here with a cast of many from the PA side to begin coordination on announcement planning. Specifically, I learned from our team today that we'd like to suggest October 17 as an option. Is there a specific driver for this date?

Of course, please loop in the key folks from your team who are most relevant to this effort as well. For our internal team, here is the status of our core messages (subject of course Becky to your feedback):

1. We will be announcing the next two sites in AWS' innovation campus build out in PA – one in Kline Township, Schuylkill County, and one in Hazle Township, Luzerne County (also known as project Hazelnut, an OTO fast-track project). These will be positioned as additional sites to fulfill the initial $20 billion, 1250 job commitment announced in June.

1. On the AWS side, in addition to the two new locations, you are prepared to announce:

* A “progress report” on our June announcement, including permanent and construction jobs created, capital invested, tax revenues realized at the state and local level, and indirect impacts; we currently have estimated AWS jobs, 2025 payroll, and capital investment for Salem Township and Falls Township sites (I do not have permission to disclose, approval is not guaranteed and may require additional time). I have estimates on local property tax, but we would need to work together on “other” tax revenue (ex. local wage tax, transfer tax, sales and use tax not exempt under CDC program, etc.)

* A new reclaimed water system to be deployed specifically at Hazle (AWS can elaborate further), which saves energy and water; yes, we can discuss on the call.

* AWS will provide funding for a new waterline in Beech Haven (Salem Township) to provide 100+ residents with potable water (many are currently using unsafe wells)

* Within the next 30 days AWS will release a ~$5M Community Benefit Payment to Salem Township as part of our CBA. Similar community benefit agreements have been negotiated with Kline Township and Hazel Township (the CBA’s are not public yet)

and

* A set of community-focused investments in the Hazleton area similar to those announced at the June event in Berwick. We have a list of organizations that applied for and received grant funds from our Community Investment Fund announced in June (the recipient organizations are located in Luzerne, Columbia, and Bucks County)

1. On the PA side, we would ideally like to be prepared to announce:

* $10 million in investments into workforce partners we first announced at the Salem Township site (this will require some rapid work over the next couple weeks to land a comprehensive plan).

* (tentative) ongoing progress regarding partnerships between PA’s research universities and AWS to make cutting-edge compute available to PA-based researchers and startups.

That’s all for now – I hope this helps rekindle the excellent collaboration we saw between our teams

for the first announcement. We are grateful for the continued investment!

Best,

Rick

[cid:image001.png@01DC3480.AA914E60]

Rick Siger | Secretary

PA Department of Community & Economic Development Commonwealth Keystone Building

400 North Street, 4th Floor | Harrisburg, PA 17120-0225

P: [redacted] | E: [redacted] mailto: [redacted] <mailto: [redacted] 20> | dced.pa.gov<http://www.dced.pa.gov/<http://www.dced.pa.gov/>>

Connect with DCED

LinkedIn<https://www.linkedin.com/company/pennsylvania-department-of-community-&-economic-development/posts/?feedView=all> | X<https://x.com/PADCEDnews> | Facebook<https://www.facebook.com/PADCED> | YouTube<https://www.youtube.com/user/dcedpa> | DCED Newsletter<https://dced.pa.gov/newsletter/>

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Pennsylvania
Office of Open Records

Standard Right-to-Know Law Request Form

*Please read carefully. Complete this form and retain a copy of **both** pages; this copy may be required if an appeal is filed. You have 15 business days to appeal after a request is denied or deemed denied. More information about the RTKL is available at https://www.openrecords.pa.gov. In most cases, a completed RTKL request form is a public record.*

SUBMITTED TO AGENCY NAME: Hazle Township (Attn: AORO)

Date Request Submitted: 6/25/26 Submitted via: ■ Email □ U.S. Mail □ Fax □ In Person

PERSON MAKING REQUEST:

Full Name: Erika Cook

Company (if applicable): _____

Please send response via: ■ Email □ U.S. Mail

If you wish to obtain records that only exist in hard copy, or must be provided on an electronic storage device, you may be required to provide a mailing address to the agency. See Section 703.

Email: elcook33@gmail.com

Mailing Address: 38 Red Rock Road

City: Sugarloaf State: PA Zip: 18249 Telephone: 570-233-8205

How do you prefer to be contacted if the agency has questions? □ Telephone ■ Email □ U.S. Mail

■ By checking this box, I affirm that my full name and contact information is true and correct, and that I am a legal resident of the United States. *I understand that failure to check this box may result in the denial of my request and the dismissal of any appeal filed with the Office of Open Records.*

RECORDS REQUESTED: *Provide as much detail as possible, including subject matter, time frame, and type of record sought. RTKL requests must seek records, not ask questions. Use additional pages if necessary.*

Please provide any and all documents, communications, memoranda, notes, emails and electronically stored information pertaining to any application, correspondence, or communication with Amazon Web Services (AWS) or Amazon Data Services, Inc. with any member of the Board of Supervisors, Zoning Hearing Board, Planning Commission,Township Employee, Township Engineer, or Township Solicitor.

Form continues on page 2. Retain a copy of both pages.

RECORDS REQUESTED (continued):

DO YOU WANT COPIES? ☐ Yes, printed ■ Yes, electronic ☐ No, in-person inspection

Records shall be provided in the medium requested if they exist in that medium; otherwise, they shall be provided in the medium in which they exist. See Section 701. Your request may require payment or prepayment of fees. View the Official RTKL Fee Schedule for more details.

I understand that my request may incur fees. Notify me before further processing if fees will be more than ☐ $100 (or) ■ $5_____**.**

Do you want certified copies? ☐ Yes (*may be subject to additional costs*) ■ No

ITEMS BELOW THIS LINE FOR AGENCY USE ONLY

Tracking: _____ Date Received: _____ Response Due (5 bus. days): _____

30-Day Ext.? ☐ Yes ☐ No (If Yes, Final Due Date: _____) Actual Response Date: _____

Request was: ☐ Granted ☐ Partially Granted & Denied ☐ Denied Cost to Requester: $_____

☐ Appropriate third parties notified and given an opportunity to object to the release of requested records.

Retain a copy of both pages of this Form.

Gmail **Erika Cook <elcook33@gmail.com>**

RE: Right to Know Request

1 message

Hazle Township Supervisors <supervisors@hazletownship.com> Thu, Jul 2, 2026 at 9:11 AM
To: Erika Cook <elcook33@gmail.com>

Erika,

Please see attached response.

Have a good holiday weekend.

Wendy

From: Erika Cook <elcook33@gmail.com>
Sent: Sunday, June 28, 2026 8:56 AM
To: Hazle Township Supervisors <supervisors@hazletownship.com>
Subject: Re: Right to Know Request

Oh my goodness, I apologize! I have attached it now.

Thank you!

Erika

On Sun, Jun 28, 2026 at 8:26 AM Hazle Township Supervisors <supervisors@hazletownship.com> wrote:

> Erika,
>
> The RTK request was not attached.
>
> Wendy
>
> ---
>
> **From:** Erika Cook <elcook33@gmail.com>
> **Sent:** Thursday, June 25, 2026 2:26 PM
> **To:** Hazle Township Supervisors <supervisors@hazletownship.com>
> **Subject:** Right to Know Request

Good afternoon,

Please see my attached RTK request dated 6/25/26.

Thank you,

Erika Cook

---

doc05212820260702080934.pdf
451K

Exhibit 2C

HAZLE TOWNSHIP SUPERVISORS

P.O. BOX 506
HARLEIGH, PA 18225-0506

ZONING 570 455-2030
FAX 570 453-2402

SUPERVISORS 570 455-2039
FAX 570 455-6184

CODE ENFORCEMENT 570 455-2030
FAX 570 453-2402

Freight Delivery Address: 101 W. 27th St.., Hazle Township, PA 18202

July 2, 2026

via email only: elcook33@gmail.com
Erika Cook
38 Red Rock Road
Sugarloaf, PA 18249

RE: Right-to-Know Request

Dear Mrs. Cook:

Thank you for writing to Hazle Township with your request for information pursuant to the Pennsylvania Right-to-Know Law ("RTKL), 65 P.S. 67.101, *et. seq*. On June 29, 2026 we received your complete request via e-mail, where you requested copies of "any and all documents, communications, memoranda, notes, emails and electronically stored information pertaining to any application, correspondence, or communication with Amazon Web Services (AWS) or Amazon Data Services, Inc. with any member of the Board of Supervisors, Zoning Hearing Board, Planning Commission, Township Employee, Township Engineer, or Township Solicitor". Your request is denied for the following reason, as permitted by Section 705 of the RTKL.

Based on a thorough examination of records/documents in the possession, custody and control of Hazle Township, the records/documents you requested do not exist.

You have a right to appeal this denial in writing to: Office of Open Records, 333 Market St., 16th Floor, Harrisburg, PA 17101-2234. Appeals can also be filed online at the Office of Open Records website, https://www.openrecords.pa.gov.

If you choose to file an appeal, you must do so within 15 business days of the mailing date of the agency's response. See 65 P.S. Section 67.1101. Please note that a copy of your original RTKL request, the agency's extension notice (if applicable), and this denial letter should be included when filing an appeal. More information about how to file an appeal under the RTKL is available at the Office of Open Records website, https://www.openrecords.pa.gov.

If you have additional questions, please contact Wendy Naprava, Hazle Township Right to Know Officer, at 570-455-2039.

Respectively,

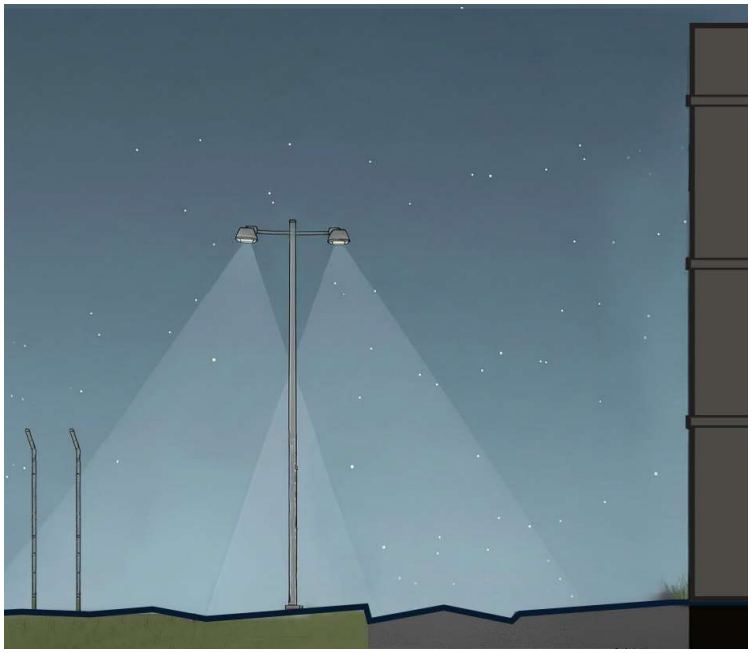
Wendy Naprava

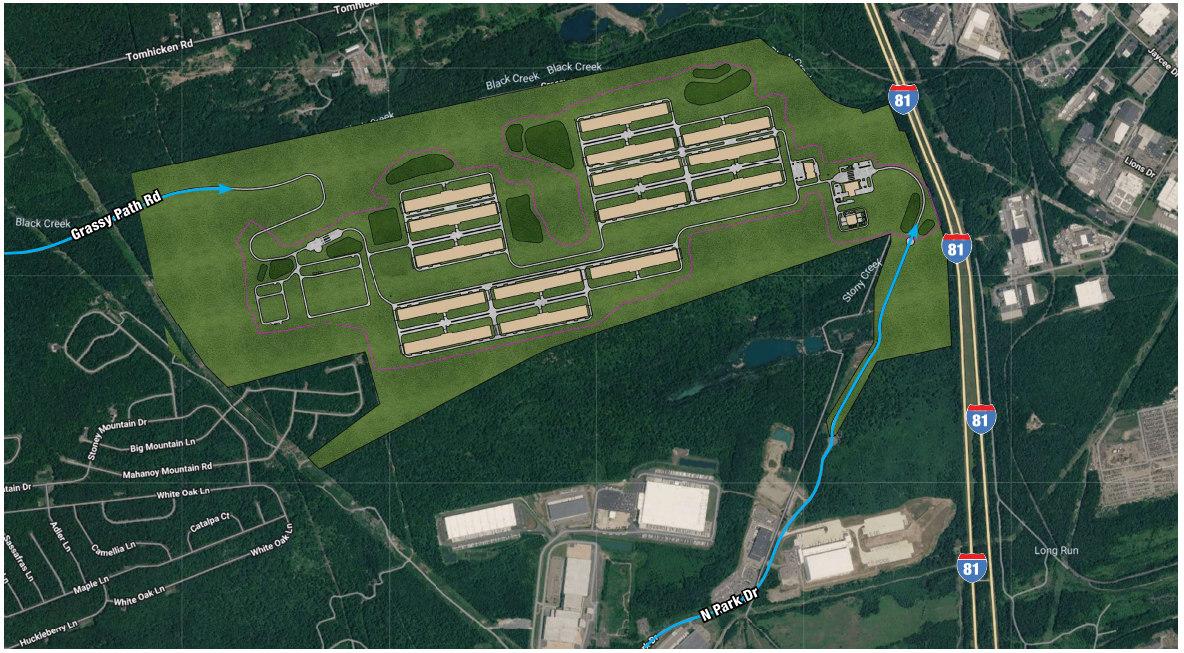
Wendy Naprava
Open Records Officer

Exhibit 3

PROJECT HAZELNUT

TRAFFIC & LIGHTING





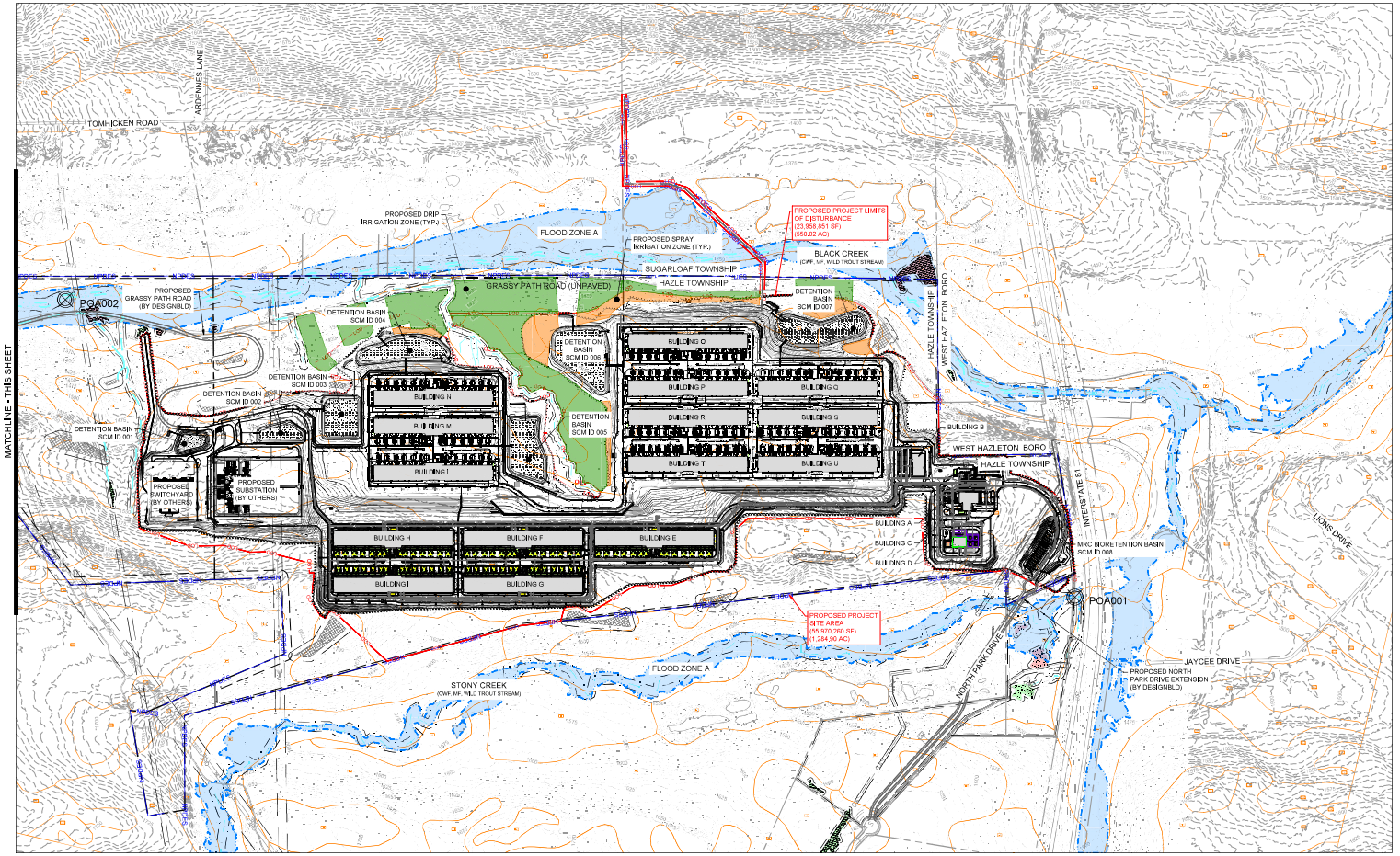
LIGHTING

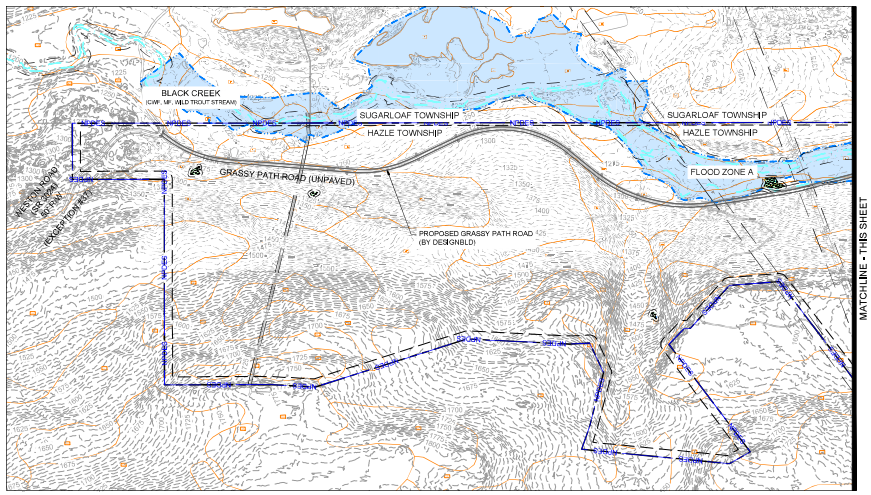
- Lighting is proposed to shine within campus fencing
- All lighting is designed to project light downward, without upward spill of light
- Buildings nearest to Eagle Rock will be more than 700' from nearest residential property line

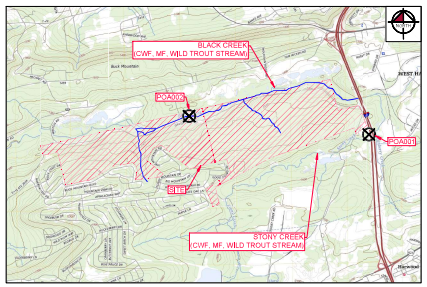
TRAFFIC

- Traffic study has been approved by PennDOT
- Campus will have two (2) access points:
  - **North Park Dr**
  - **Grassy Path Rd**
- Both access points will have private roadways leading to campus
- Project will fund and construct expanded turning lanes at southern end of North Park Dr

Exhibit 4







USGS MAP
(CONYNGHAM QUADRANGLE)
SCALE: 1" = 3,000'

POST CONSTRUCTION STORMWATER MANAGEMENT LEGEND

- PARCEL LINE
- LOD — LIMITS OF DISTURBANCE (550.02 AC)
- NPDES — PROJECT SITE BOUNDARY (1,284.90 AC)
- LOD — LIMITS OF DISTURBANCE FOR ACCESS SCOPE OF WORK (SEE DESIGNBLD PLANS)
- XXX — EXISTING CONTOUR
- XXX — PROPOSED CONTOUR
- STORM MANHOLE
- EXISTING SOIL BOUNDARY
- F — FIRE WATER PIPE
- W — DOMESTIC WATER PIPE
- IW — INDUSTRIAL WATER PIPE
- S — SANITARY SEWER PIPE
- IWW — INDUSTRIAL WASTEWATER SANITARY PIPE
- SAN—FM — SANITARY SEWER FORCE MAIN
- IWW — INDUSTRIAL WASTEWATER FORCE MAIN
- PROPOSED STORM PIPE
- PROPOSED UTILITY
- 18"Ø — PROPOSED 18"Ø COMPOST FILTER SOCK
- 24"Ø — PROPOSED 24"Ø COMPOST FILTER SOCK
- 32"Ø — PROPOSED 32"Ø COMPOST FILTER SOCK
- OHE — OVERHEAD ELECTRIC
- NON-EV WETLAND
- EV WETLAND
- PROPOSED DETENTION BASIN BOTTOM (PER DETAIL)
- PROPOSED DRIP IRRIGATION ZONE
- PROPOSED SPRAY IRRIGATION ZONE
- POA000 — PROPOSED POINT OF ANALYSIS
- TP-## — INFILTRATION TEST PITS
- PROPOSED IRRIGATION EQUIPMENT (REFER TO IRRIGATION PLANS)

POST CONSTRUCTION STORMWATER MANAGEMENT NOTES

1. THIS PLAN DEPICTS ALL EXISTING FEATURES. REFER TO THE EXISTING CONDITIONS AND DEMOLITION PLANS FOR EXISTING FEATURES THAT ARE SPECIFIED TO BE REMOVED OR RELOCATED.

SCHEDULE OF INSTALLATION INSPECTIONS

THE TOWNSHIP ENGINEER OR HIS MUNICIPAL ASSIGNEE SHALL INSPECT ALL PHASES OF THE INSTALLATION OF THE PERMANENT STORMWATER MANAGEMENT FACILITIES INCLUDING:

A. COMPLETION OF PRELIMINARY SITE PREPARATION INCLUDING STRIPPING OF VEGETATION, STOCKPILING OF TOPSOIL, AND INSTALLATION OF TEMPORARY STORMWATER MANAGEMENT, SEDIMENT CONTROL, DRAINAGE FACILITIES, AND EROSION CONTROL.
B. EXCAVATION OF FACILITY TO SUB-BASE AND TRENCHES FOR ENCLOSED STORM DRAINAGE PIPE, CONCRETE STRUCTURES, AND CATCH BASINS.
C. COMPLETION OF ROUGH GRADING, BUT PRIOR TO PLACING TOPSOIL, PERMANENT DRAINAGE, OR OTHER SITE DEVELOPMENT IMPROVEMENTS AND GROUND COVER.
D. DURING PLACEMENT OF STRUCTURAL FILL, TRENCH BACKFILL, AND EMBANKMENT CONSTRUCTION.
E. DURING CONSTRUCTION OF PERMANENT STORM WATER FACILITIES.
F. UPON COMPLETION OF FINAL GRADING, VEGETATIVE CONTROL MEASURES, FENCING AND ESTABLISHMENT OF PERMANENT STABILIZATION OR OTHER SITE RESTORATION WORK AS DONE IN ACCORDANCE WITH APPROVED PLANS AND PERMITS.
G. FINAL INSPECTION UPON COMPLETION OF ALL STORMWATER MANAGEMENT FACILITIES TO DETERMINE IF COMPLETED WORK IS CONSTRUCTED IN ACCORDANCE WITH THE APPROVED PLAN.

ANTICIPATED PROJECT SCHEDULE

1. MASS GRADING: SEPT 2025 - MAY 2027
2. PHASE 1: JAN 2026 - JUN 2027
3. PHASE 2: SEPT 2027 - JUL 2028 (PROJECTED)
4. PHASE 3: OCT 2028 - APR 2030 (PROJECTED)

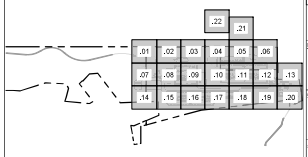
STORMWATER DISCHARGE INFORMATION

NPDES PERMIT TYPE REQUIRED: INDIVIDUAL
ABACT BMP(S) REQUIRED: YES

POINT OF ANALYSIS NUMBER	RECEIVING WATERS DISCHARGE INFORMATION							
	NAME OF RECEIVING WATERS	CHESAPEAKE BAY WATERSHED	DISCHARGE TO MS4, SURFACE WATERS	CH. 93 CLASSIFICATION	IMPAIRED	IMPAIRMENT	TMDL	▶ TMDL?
001	STONY CREEK	Y	N	CWF, MF	Y	N	Y	N
002	BLACK CREEK	Y	N	CWF, MF	Y	N	Y	N

IMPAIRED? - IF YES, IMPAIRED FOR SILTATION, SUSPENDED SOLIDS, TURBIDITY, WATERFLOW VARIABILITY, FLOW MODIFICATIONS/ALTERATIONS, OR NUTRIENTS?

TMDL? - IF YES, EPA APPROVED OR EPA-ESTABLISHED TOTAL MAXIMUM DAILY LOAD (TMDL) IN WHICH THE POLLUTANT(S) OF CONCERN INCLUDE SILTATION, SUSPENDED SOLIDS, OR NUTRIENTS?



KEY MAP
SCALE: 1" = 3,000'

GRAPHIC SCALE IN FEET
0 250 500 1000

NORTH

CALL BEFORE YOU DIG!
PA 1 CALL
811

CONFIDENTIAL

PROJECT ADDRESS
N. PARK DRIVE
HAZLE TOWNSHIP, PA

PROJECT DELIVERY PACKAGE
DESIGN DEVELOPMENT

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LEGAL NOTICE
REGIONAL LEGAL NOTICE

ISSUE DATE: 06DEC2024 | PROJECT NO: 112137012
DRAWING: ACP | CHK/APP: KWJM

REV.	DATE	DESCRIPTION
0	06DEC2024	MASS GRADING SUBMISSION
1	07FEB2025	MASS GRADING RESUBMISSION
2	21MAR2025	MASS GRADING RESUBMISSION
3	03MAY2025	MASS GRADING RESUBMISSION
4	26JUN2025	MAJOR AMENDMENT I
5	25JUL2025	MAJOR AMENDMENT RESUBMISSION
6	17OCT2025	MAJOR AMENDMENT 1 RESUBMISSION

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SECURITY ENGINEER
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999 1ST AVE SUITE 102, PMB 2287
SEATTLE, WA 98104

PROJECT: PROJECT HAZELNUT

TITLE: OVERALL POST CONSTRUCTION STORMWATER MANAGEMENT PLAN

DRAWING: C120.00 | SHEET: — OF 000

PAPER SIZE: ARCH E1 | SCALE: AS SHOWN | AGILE NO. | REV: 0

FOR PRINT DATE: 10/17/2025

PPL Electric Utilities

UNDERSTANDING ELECTROMAGNETIC FIELDS (EMF)

FACTS, SOURCES AND ANSWERS

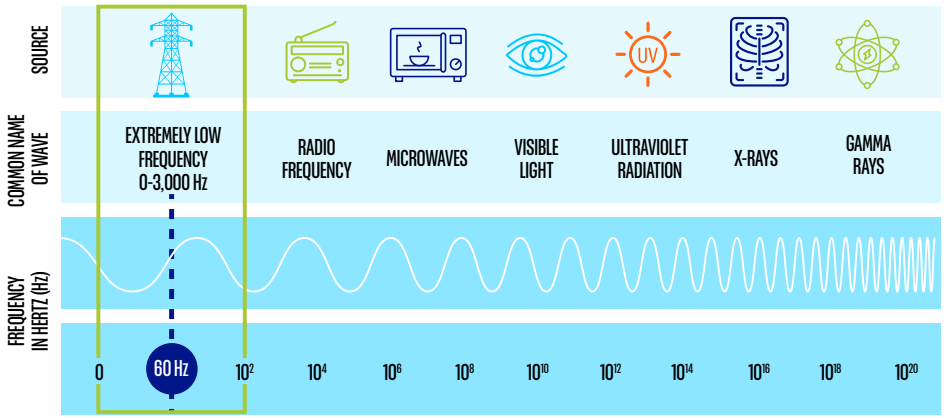
What is EMF?

Electric and magnetic fields or electromagnetic fields (EMF) are invisible areas of energy that form around electrical devices and wiring. These fields are generated whenever electricity flows, meaning they are present around things like power lines, household appliances and everyday electronics like cell phones, computers and microwaves.

Often times, EMF can be confused with radiation like medical X-rays or ultraviolet sunlight as the term "radiation" is often used to refer to two very different things.

Radiation is a scientific term that simply describes how energy travels from a source. A rock tossed into a pond is a source of energy. Where it lands it will cause ripples that "radiate" out in circles — that is a simple example of radiation. Television and radio broadcast towers, power lines, appliances and even home wiring all have fields that radiate from them.

The term radiation, however, can also refer to very different fields, such as those from medical X-rays or the ultraviolet part of sunlight. Exposure to fields from those types of sources can damage cells, which can lead to cancer. A good example is overexposure to sunlight, which can lead to skin cancer. The damage occurs by a process called ionization, so those, more dangerous, fields are categorized by science as ionizing radiation.



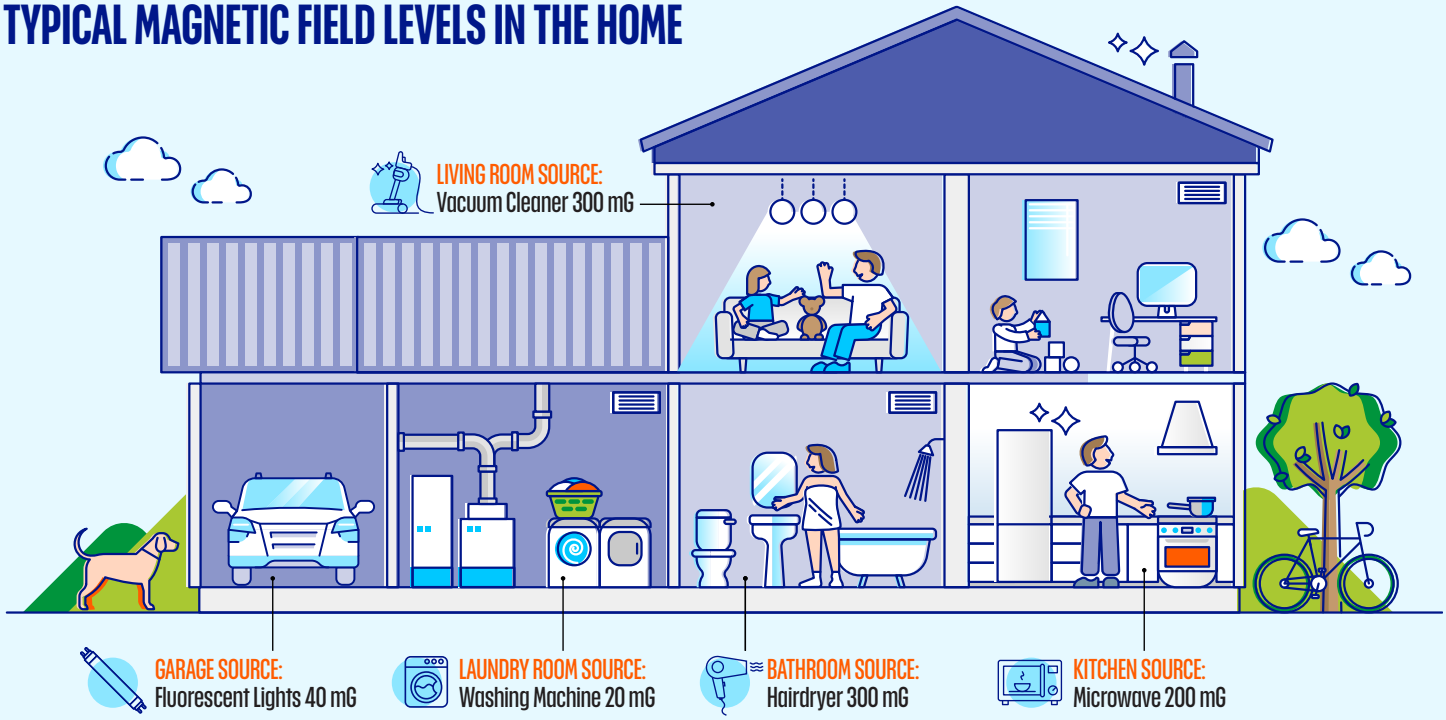
However, EMF from power lines, electrical appliances and home wiring is not strong enough to damage cells, so it's not the same as the radiation from medical X-rays or the ultraviolet part of sunlight. Because of this, EMF is categorized as non-ionizing.

The capability to damage cells is determined by the frequency of the source. That is measured in Hertz (Hz). For a source to produce enough energy to damage cells, it must be at a frequency of approximately 10,000,000,000,000,000 Hertz.

EMF from the use of electricity is at a frequency of only 60 Hertz here in the U.S. and Canada.

How much research has been done on EMF and health?

EMF has been studied for nearly 50 years, with studies dating back to 1977. Based on this research, which includes approximately 25,000 articles in the past 30 years, the World Health Organization (WHO) has concluded that scientific knowledge in this area is now more extensive than for most chemicals. ***In a recent comprehensive review of the scientific literature, the WHO concluded that current evidence does not confirm the existence of any health consequences from exposure to low-level electromagnetic fields.***



Common EMF sources

EMF can be found around electrical devices and wiring. Things like power lines, household appliances and everyday electronics like cell phones, computers and microwaves have an electromagnetic field. The table below shows examples of common EMF sources as well as their associated levels in milligauss.

It's important to note that the strength of EMF decreases significantly with distance. For example, the magnetic fields people encounter inside their homes from common appliances can often be stronger than those from nearby transmission lines, according to the National Cancer Institute (NCI).

Levels of EMF from common sources (median in milligauss)			
Source	EMF level at 6"	EMF level at 1'	EMF level at 4'
Copy machine	4	2	-
Coffee maker	7	-	-
Toasters	10	-	-
Dishwasher	20	10	-
Washing machine	20	7	-
Fluorescent lights	40	6	2
Blenders	70	10	-
Electric shaver	100	20	-
Microwave	200	4	2
Hairdryers	300	1	-
Vacuum cleaners	300	60	1
Can openers	600	150	2
Levels of EMF from distribution power lines (average in milligauss)			
Source	EMF level at 6'	EMF level at 165'	EMF level at 300'
12 kV distribution power line	10	-	-
Levels of EMF from transmission power lines (average in milligauss)			
Source	EMF level at 100'	EMF level at 200'	EMF level at 300'
115 kV transmission power line	2	-	-
230 kV transmission power line	7	2	1
500 kV transmission power line	13	3	1

FREQUENTLY ASKED QUESTIONS (FAQS)

Are there any health effects associated with exposure to EMF?
Current scientific evidence reveals no health consequences from exposure to low-level electromagnetic fields (EMF), which are produced by things like appliances, wiring found in homes and power lines.

What has PPL Electric done to reduce potential EMF risks?
Our lines are designed to minimize the effects of EMF and while there are no specific State or Federal regulations around electric and magnetic fields, we have internal specifications that we engineer for during the design phase of projects.

For example, options we consider for new transmission lines include:

- Reversing the phases of new overhead double-circuit transmission lines, which can result in some cancellation of magnetic fields from the line and also lowers the magnetic fields at the edge of the right-of-way area.
- Building new transmission and distribution lines higher than previous designs because the level of magnetic fields at ground level will be lower overall.

Public health and safety are always a focus for us. We adhere to all applicable safety and engineering standards, and we monitor and follow research from trusted institutions such as the World Health Organization and the U.S. National Institutes of Health.

What conclusions have government health authorities and organizations in other countries reached about whether EMF causes health effects?

- **The Swedish Radiation Safey Authority (SSM)** stated, in their annual report that covers different areas of EMF (static, low frequency, intermediate and radio frequency fields) and different types of studies such as biological, human and epidemiological studies, that no new established causal relationships between EMF exposure and health risk have been identified.
- **Health Canada** recently found that the vast majority of scientific research to date does not support a link between extremely low frequency magnetic field exposure and human cancers.
- **The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA)** found that scientific evidence does not firmly establish that exposure to 50 Hz electric and magnetic fields found around the home, the office or near power lines is a hazard to human health.
- **Energy Networks Association**, based in the United Kingdom, notes that in over 40 years of biological research looking for proposed health risk from EMF, there have been no such reproductible results.

How are agencies evaluating whether EMF exposure causes health effects?
There are three main types of studies that agencies use. These include laboratory, clinical and epidemiology studies. All of these provide valuable information. However, within any scientific discipline, it's important that all of the available studies and research are examined wholistically. No single study or type of study can be definitive.

Regardless of the timeframe, country of origin or peoples researched, there are no consistent findings that there are any health consequences from exposure to low-level electromagnetic fields (EMF). In addition, scientific knowledge in the area of EMF's biological or health effects is now more extensive than for most chemicals, according to the World Health Organization.

If I have an implanted medical device, how does EMF affect me?
The guidelines and exposure limits presented here are intended for the general public and may not apply to individuals with implanted medical devices, such as pacemakers. If you have such a device, it's important to consult both the manufacturer and the healthcare professional who implanted it for personalized advice about EMF exposure.

Are there any EMF exposure guidelines?

Our lines are designed to minimize the effects of EMF and while there are no specific State or Federal regulations around electric and magnetic fields, we have internal specifications that we engineer for during the design phase of projects.

Two international industrial expert groups — the Institute of Electrical and Electronics Engineers (IEEE) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP) — do have exposure guidelines based on avoiding very high levels of exposure that can produce short-term biological responses, such as the perception of a faint flickering of light or a tingling on the skin. Both groups have concluded that no adverse health effects occur at EMF levels below their exposure guidelines.

EMF levels under a typical 500 kV transmission line are 95% below the strictest guideline.

Typical EMF levels from power lines compared to EMF exposure guidelines *(in milligauss)*	
IEEE exposure guideline for general public	9,000
ICNIRP exposure guideline for general public	2,000
500 kV transmission line average under the line	87
Typical distribution line maximum under the line	70
Typical distribution line maximum underground	40
500 kV transmission line at edge of right-of-way	30
Typical distribution line average	20

Are there any exposure limits for EMF in Pennsylvania?

Pennsylvania has not adopted any electric or magnetic field exposure limits.

Can I avoid being exposed to EMF if I avoid power lines?

Not entirely. Electromagnetic fields are present wherever electricity is used — this includes household wiring, electrical devices and power lines. Your level of exposure depends on three factors: the strength of the EMF at its source, your distance from that source and how long you're near it. Levels are highest right at the source, but the strength of EMF decreases significantly with distance. For example, the magnetic fields people encounter inside their homes from common appliances can often be stronger than those from nearby transmission lines, according to NCI.

Would having underground lines eliminate EMF altogether?

No. While the ground can block electric fields, magnetic fields can still pass through the ground.

Does my digital advanced electric meter emit EMF?

These devices, which operate at about the same radiofrequencies as cell phones, transmit information on the consumption of electricity to utility companies, like PPL Electric. Advanced meters — sometimes known as smart meters — produce very low-level fields that often cannot be distinguished from the total background radiofrequency radiation levels inside a typical home.

Does Earth itself produce EMF?

Yes. The planet naturally emits EMF, mostly in the form of static fields, which are similar to those produced by direct current (DC) electricity. Electric fields arise from atmospheric activity like air turbulence, while the Earth's magnetic field — measured around 500 milligauss — is believed to be generated by electric currents deep within the planet's core.

Where else can I find more information about EMF?

We encourage customers to visit the following resources for additional, science-based information:

- ***U.S. National Cancer Institute's Electromagnetic Fields Webpage***
- ***World Health Organization's Electromagnetic Fields Webpage***
- ***Electric Power Research Institute's (EPRI) EMF and Your Health Webpage***
- ***Health Canada's Extremely Low Frequency Electric and Magnetic Fields Webpage***
- ***Swedish Radiation Safety Authority's Recent Research on EMF and Health Risk Report***

Sources

1. World Health Organization. "Radiation: Electromagnetic fields." *World Health Organization Website.* August 4, 2016. https://www.who.int/news-room/questions-and-answers/item/radiation-electromagnetic-fields
2. Chou, Chung-Kwang. "Controversy in Electromagnetic Safety." *International journal of environmental research and public health* vol. 19,24 16942. December16, 2022, doi:10.3390/ijerph192416942
3. National Institute of Environmental Health Sciences and National Institutes of Health. *"EMF: Electric and Magnetic Fields Associated with the Use of Electric Power."* June, 2002. https://www.niehs.nih.gov/sites/default/files/health/materials/electric_and_magnetic_fields_associated_with_the_use_of_electric_power_questions_and_answers_english_508.pdf
4. The Swedish Radiation Safety Authority (SSM). *"2024: 05 Recent Research on EMF and Health Risk, Seventeenth report from SSM's Scientific Council on Electromagnetic Fields, 2022."* March 26, 2024. https://www.stralsakerhetsmyndigheten.se/en/publications/reports/radiation-protection/2024/202405/
5. Health Canada. *"Power lines and electrical products: Extremely low frequency electric and magnetic fields."* November 1, 2022. https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/everyday-things-emit-radiation/power-lines-electrical-appliances.html
6. Australian Radiation Protection and Nuclear Safety Agency (ARPANSA). *"Electricity and health."* Accessed July 10, 2025. https://www.arpansa.gov.au/understanding-radiation/radiation-sources/more-radiation-sources/electricity
7. Energy Networks Association. "Electric and Magnetic Fields (EMFs): The Facts Issue 2 (2025)." April 2025. https://www.emfs.info/sites/g/files/atxybb296/files/2025-04/ENA%20EMFs%20THE%20FACTS_V01%202025.pdf

PPL Electric Utilities

Exhibit 6

Gmail

Erika Cook <elcook33@gmail.com>

RE: Proofs of publication -- PPL Electric Utilities Corporation Letter of Notification (Tomhicken 230 kV) - Docket No. A-2025-3059443

1 message

Wilburn, Hayley <HWilburn@postschell.com> Mon, Jun 29, 2026 at 2:26 PM
To: "Coogan, John" <jcoogan@pa.gov>, "Berkstresser, Lindsay" <LBerkstresser@postschell.com>, "Lent, Garrett" <GLent@postschell.com>, "Shafer, Michael J" <mjshafer@pplweb.com>, "Bartolomei, Michelle Lynne" <mlbartolomei@pplweb.com>, "MacGregor, David" <dmacgregor@postschell.com>, "Corey, Brittney" <BCorey@postschell.com>
Cc: "Gannon, Erin" <egannon@pa.gov>, "Guthrie, Jacob D." <JGuthrie@paoca.org>, jharmar <jharmar@paoca.org>, "El Atieh, Melanie J." <MElAtieh@paoca.org>, elcook33 <elcook33@gmail.com>, zolajj <zolajj@gmail.com>

Good afternoon, Your Honors,

PPL Electric will be filing the proofs of publication today.

However, as an update to PPL Electric's publication of the Public Input Hearing Notices, PPL Electric was informed that the Wilkes-Barre Citizen's Voice failed to publish the Notice twice. The Notice was run on June 16, 2026, but not on June 9, 2026. This was an error made by the publication, which the Company did not learn about until today.

In an attempt to remedy the situation to the best of its ability, PPL Electric has asked that the Wilkes-Barre Citizen's Voice also publish the Notice tomorrow morning.

Respectfully,

Hayley Wilburn
Associate
Post & Schell, P.C.
One Oxford Centre
301 Grant Street
Suite 3010
Pittsburgh, PA 15219

412-506-6362 (Phone)
412-227-9065 (Fax)
hwilburn@postschell.com
www.postschell.com

From: Coogan, John <jcoogan@pa.gov>
Sent: Monday, June 29, 2026 8:42 AM
To: Wilburn, Hayley <HWilburn@PostSchell.com>; Berkstresser, Lindsay <LBerkstresser@PostSchell.com>; Lent, Garrett <GLent@PostSchell.com>; Shafer, Michael J <mjshafer@pplweb.com>; Bartolomei, Michelle Lynne <mlbartolomei@pplweb.com>; MacGregor, David <dmacgregor@postschell.com>; Corey, Brittney <BCorey@PostSchell.com>

Cc: Gannon, Erin <egannon@pa.gov>; Guthrie, Jacob D. <JGuthrie@paoca.org>; jharmar <jharmar@paoca.org>; El Atieh, Melanie J. <MElAtieh@paoca.org>; elcook33 <elcook33@gmail.com>; zolajj <zolajj@gmail.com>
Subject: Proofs of publication -- PPL Electric Utilities Corporation Letter of Notification (Tomhicken 230 kV) - Docket No. A-2025-3059443

Exhibit 6

ALERT: This message originated outside of Post & Schell's network. BE CAUTIOUS before clicking any link or attachment.

Counsel for PPL,

Please file the proofs of publication of notice for the public input hearings before the public input hearings start tomorrow, or otherwise provide a status on the proofs of publication.

Thank you,

ALJs Coogan and Gannon

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Exhibit 7A

COMMONWEALTH OF PENNSYLVANIA
OFFICE OF THE GOVERNOR
HARRISBURG

April 24, 2026

***Via* Electronic Transmission to <[redacted]>**
Colby Wesner
[redacted]

Re: Right-to-Know Law Request - dated March 18, 2026
Internal No. C-2026-053

Dear Mr. Wesner:

On March 18, 2026, the Office of the Governor (Office) received your request for information pursuant to the Pennsylvania Right-To-Know Law, 65 P.S. §§ 67.101, et seq. (RTKL), wherein you requested:

1. I am requesting any and all correspondence, including emails with attachments, between Governor Josh Shapiro (and staff) and Data Center Coalition members, including, but not limited to Dan Diorio, from June 2025 to the present.

2. I am requesting any and all correspondence, including emails with attachments, between Governor Josh Shapiro (and staff) and any PA state elected representatives or senators, that discusses House Bill 2151. Included in this request is any correspondence with other state agencies, including, but not limited to, DCED and DEP, about House Bill 2151.

3. I am requesting any and all correspondence, including emails with attachments, between Governor Josh Shapiro (and staff) and Becky Ford of Amazon, from June 2025 to the present, that discusses Project Anvil and/or data center development in Montour County.

4. I am requesting any and all correspondence, including emails with attachments, between Governor Josh Shapiro (and staff) and any AWS employees or constituents, discussing data center legislation or incentives, from June 2025 to the present.

5. I am requesting any, and all correspondence, including emails with attachments, between Governor Josh Shapiro (and staff) and DCED Secreatry Rick Siger, discussing AWS data centers, data center regulations, data center legislation, and/or data center ordinances, from June 2025 to the present.

6. I am requesting any and all correspondence, including emails with attachments, between Governor Josh Shaprio (and staff) and Jennifer Wakemen of DRIVE, from October 2025 to the present, discussing data center development in Montour County.

7. Copies of all pending, or executed, community benefits agreements, regarding data centers in Pennsylvania

Exhibit 7A

By letter dated March 25, 2026, this Office informed you that it would require an extension of time, until no later than April 24, 2026, to review your request.

After review, your request is granted as to the attached pdf. However, the Office has not provided or has redacted records or portions of records protected by the attorney-client or attorney work product privileges; records or portions of records that would reveal personal identification information such as personal email addresses, telephone numbers, personal financial information, or similar personal identifying information; and records or portions of records that would reveal the internal, predecisional deliberations of officials or employees. 65 P.S. § 67.102, 65 P.S. § 67.708 (b)(6), (b)(10).

You have the right to appeal this response to the Office of Open Records. If you choose to file an appeal, you must do so in writing and within 15 business days of the mailing date of this response and simultaneously send a copy of the appeal to me in the same manner as the appeal is sent to the Office of Open Records (i.e., e-mail, fax, and regular U.S. mail or hand delivery.) Please direct your appeal to the Executive Director, Office of Open Records, 555 Walnut Street, Suite 605, Harrisburg PA 17101. If you choose to file an appeal, you must include the following:

(1) a copy of your request;
(2) a copy of this response; and
(3) the reason(s) in support of your appeal and/or why you believe the agency is in possession of records, or unable to meet any of the exemptions as stated in this response.

For your convenience, the Office of Open Records has an appeal form available on its website at: http://www.openrecords.pa.gov/Documents/Appeals/Appeal_Form.pdf , and an appeal may be filed online at https://www.openrecords.pa.gov/Appeals/AppealForm.cfm .

Thank you for your patience as we processed your request. Should you have any questions or require any further assistance, please do not hesitate to contact me *via* e-mail at RA-GOVRTKL@pa.gov
.

Respectfully,



Marc Eisenstein
Agency Open Records Officer

From: Siger, Rick[redacted]
Sent: Mon 6/23/2025 2:09:03 PM (UTC-04:00)
To: Ford, Becky[redacted] Kirshner, Benjamin[redacted]
Subject: Re: [External] Confidential Real Clear PA interview on Amazon data centers

This is news to me – will check into it ASAP.

From: Ford, Becky <[redacted]
Date: Monday, June 23, 2025 at 1:26 PM
To: Siger, Rick <[redacted] Kirshner, Benjamin <[redacted]
Subject: [External] Confidential Real Clear PA interview on Amazon data centers

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.

Rick/Ben-

Please see the inquiry below. Would it be possible to understand who from the Governor's office may have directed the reporter to contact our team? This was not one of the two sites disclosed.

Becky

Becky Ford I Economic Development
AWS Infrastructure Global Expansion
E:[redacted] **M:** +[redacted]

From: Grisham, Preston <[redacted]
Sent: Monday, June 23, 2025 12:48 PM
To: Ford, Becky <[redacted] Madrid, Merle <[redacted]
Cc: Neasham, Duncan <[redacted]
Subject: FW: [EXTERNAL] Real Clear PA interview on Amazon data centers

Becky and Merle – Please see the media inquiry below as it relates to "Project Hazelnut" – Duncan and I are not familiar with this and not sure what has been communicated to the Governor's office. It appears from the inquiry and the fact that the Gov's office has directed the reporter to Amazon for more details they may have outed us on a project.

Welcome any additional context here.

From: "Griffin, Simone" <[redacted]

Date: Monday, June 23, 2025 at 12:08 PM
To: "Neasham, Duncan" <[redacted] "Grisham, Preston" <[redacted] "Hurst, Matt" <[redacted]
Subject: FW: [EXTERNAL] Real Clear PA interview on Amazon data centers

Hi - I hope all is well. I've received the inquiry below from a writer with Real Clear Pennsylvania regarding Amazon's data center infrastructure expansion efforts in Pennsylvania, along with our recent $20 billion investment announcement on June 9.

This writer is inquiring about "Project Hazelnut" and claims that Governor Shapiro's office directed him to speak with Amazon for a response. I've highlighted the sections that deal with Project Hazelnut and I'm seeking insight from the Policy Comms team on any information that has been communicated to Governor Shapiro's office regarding Amazon infrastructure projects, including Project Hazelnut.

For the highlighted section, I plan to share our About Amazon blog post on the $20 billion investment to answer his questions, along with our approved Pennsylvania announcement messaging.

Please provide more details about Project Hazelnut, ideally **by 2 PM ET today,6/23**. I look forward to hearing back from you.

-Simone

From: Ethan Dodd <[redacted]
Sent: Monday, June 23, 2025 11:38 AM
To: Griffin, Simone <[redacted]
Subject: RE: [EXTERNAL] Real Clear PA interview on Amazon data centers

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

I should add: For the 900 permanent jobs from Project Hazelnut, what are the specific job roles to be created? What are expected salaries for these roles?

Same question for the 1,250 jobs promised with the $20 billion investment.

Thanks,
Ethan

On Mon, Jun 23, 2025 at 11:18 AM Ethan Dodd <[redacted] wrote:
Hi Simone,

I'm writing about data centers for Real Clear Pennsylvania and had some questions. Governor Shapiro's office thought you would be best to answer these.

It sounds like Amazon's Project Hazelnut is going to be huge, promising 900 permanent jobs. Can

you help me explain how you arrived at this number? Will there be 900 full-time employees at the data center campus when it's up and running? Are some of these indirect or induced jobs?

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What will the projected tax payments be for Project Hazelnut and the two other Amazon sites? County and state if possible.

Are these going to be 100MW data centers? How much power will these campuses require?

What factors were most important when choosing to locate data center campuses in Pennsylvania? Did Governor Shapiro's fast-track permitting program help decide on the state?

Would you like to answer these questions by phone? My cell is 3013056998.

Can you answer these before 5 PM today?

Thank you so much,
Ethan

From: Siger, Rick[redacted]
Sent: Mon 6/23/2025 2:18:10 PM (UTC-04:00)
To: Ford, Becky[redacted] Kirshner, Benjamin[redacted]
Subject: Re: [External] Confidential Real Clear PA interview on Amazon data centers

Reading this again – its very possible the reporter made an inquiry about Hazlenut and we didn't comment…but I will run this down.

Back to you shortly.

R.

From: Ford, Becky <[redacted]
Date: Monday, June 23, 2025 at 1:26 PM
To: Siger, Rick <[redacted] Kirshner, Benjamin <[redacted]
Subject: [External] Confidential Real Clear PA interview on Amazon data centers

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Rick/Ben-

Please see the inquiry below. Would it be possible to understand who from the Governor's office may have directed the reporter to contact our team? This was not one of the two sites disclosed.

Becky

Becky Ford I Economic Development
AWS Infrastructure Global Expansion
E:[redacted] **M:** +[redacted]

From: Grisham, Preston <[redacted]
Sent: Monday, June 23, 2025 12:48 PM
To: Ford, Becky <[redacted] Madrid, Merle <[redacted]
Cc: Neasham, Duncan <[redacted]
Subject: FW: [EXTERNAL] Real Clear PA interview on Amazon data centers

Becky and Merle – Please see the media inquiry below as it relates to "Project Hazelnut" – Duncan and I are not familiar with this and not sure what has been communicated to the Governor's office. It appears from the inquiry and the fact that the Gov's office has directed the reporter to Amazon for more details they may have outed us on a project.

Welcome any additional context here.

From: "Griffin, Simone" <[redacted]
Date: Monday, June 23, 2025 at 12:08 PM
To: "Neasham, Duncan" <[redacted] "Grisham, Preston" <[redacted] "Hurst, Matt" <[redacted]
Subject: FW: [EXTERNAL] Real Clear PA interview on Amazon data centers

Hi - I hope all is well. I've received the inquiry below from a writer with Real Clear Pennsylvania regarding Amazon's data center infrastructure expansion efforts in Pennsylvania, along with our recent $20 billion investment announcement on June 9.

This writer is inquiring about "Project Hazelnut" and claims that Governor Shapiro's office directed him to speak with Amazon for a response. I've highlighted the sections that deal with Project Hazelnut and I'm seeking insight from the Policy Comms team on any information that has been communicated to Governor Shapiro's office regarding Amazon infrastructure projects, including Project Hazelnut.

For the highlighted section, I plan to share our About Amazon blog post on the $20 billion investment to answer his questions, along with our approved Pennsylvania announcement messaging.

Please provide more details about Project Hazelnut, ideally **by 2 PM ET today,6/23**. I look forward to hearing back from you.

-Simone

From: Ethan Dodd <[redacted]
Sent: Monday, June 23, 2025 11:38 AM
To: Griffin, Simone <[redacted]
Subject: RE: [EXTERNAL] Real Clear PA interview on Amazon data centers

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I should add: For the 900 permanent jobs from Project Hazelnut, what are the specific job roles to be created? What are expected salaries for these roles?

Same question for the 1,250 jobs promised with the $20 billion investment.

Thanks,
Ethan

On Mon, Jun 23, 2025 at 11:18 AM Ethan Dodd <[redacted] wrote:
Hi Simone,

I'm writing about data centers for Real Clear Pennsylvania and had some questions. Governor

Exhibit 7B

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Would you like to answer these questions by phone? My cell is 3013056998.

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Thank you so much,
Ethan

From: Kirshner, Benjamin[redacted]
Sent: Mon 6/23/2025 8:25:07 PM (UTC-04:00)
To: Siger, Rick[redacted] Ford, Becky[redacted]
Subject: Re: [External] Confidential Real Clear PA interview on Amazon data centers

During the same inquiry, they asked us about the job number mentioned in the press release. We advised them to reach out to AWS to discuss the job numbers from that release. I believe the reporter is conflating the two questions and attempting to create a narrative.

We did absolutely not tell this reporter that Northpoint was aws.

Ben Kirshner | Chief Transformation Officer
Office of the Governor | Office of Transformation and Opportunity
Cell: [redacted]
www.governor.pa.gov

From: Siger, Rick <[redacted]
Sent: Monday, June 23, 2025 6:21:46 PM
To: Ford, Becky <[redacted] Kirshner, Benjamin <[redacted]
Subject: Re: [External] Confidential Real Clear PA interview on Amazon data centers

Hi Becky –

Closing this loop – earlier today Rosie from our press team connected with Preston and I believe we are all good. If not, let me know and we'll get it right.

In talking to the team we absolutely did not confirm or discuss anything about AWS and Hazelnut. We did many months ago talk about Hazlenut as part of the Fast Track program, and this reporter I believe was following up on that story. It also seems folks in Luzerne County are speculating about AWS at Hazelnut – though we did not comment/confirm.

Looking forward to talking tomorrow – it has been too long!

Best,

Rick

From: Ford, Becky <[redacted]
Date: Monday, June 23, 2025 at 1:26 PM
To: Siger, Rick <[redacted] Kirshner, Benjamin <[redacted]
Subject: [External] Confidential Real Clear PA interview on Amazon data centers

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Exhibit 7B

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Exhibit 7B

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Exhibit 7B

What factors were most important when choosing to locate data center campuses in Pennsylvania? Did Governor Shapiro's fast-track permitting program help decide on the state?

Would you like to answer these questions by phone? My cell is 3013056998.

Can you answer these before 5 PM today?

Thank you so much,
Ethan

Exhibit 7B

From: Aaron Tinjum[redacted]
Attendees: Dan Diorio; Troncoso, Aaron; Robinson, Samuel; Finkel, Jacob; Josh Levi
Location: Microsoft Teams Meeting
Subject: DCC Intro Call
Importance: Normal
Start Time: Tue 8/5/2025 12:00:00 PM (UTC-04:00)
End Time: Tue 8/5/2025 12:30:00 PM (UTC-04:00)
Required Attendees: Dan Diorio; Troncoso, Aaron; Robinson, Samuel; Finkel, Jacob
Optional Attendees: Josh Levi

Microsoft Teams Need help?

Join the meeting now
Meeting ID: [redacted]
Passcode: [redacted]

Dial in by phone
[redacted] United States, Chicago
Find a local number
Phone conference ID: [redacted]
For organizers: Meeting options | Reset dial-in PIN

From: Aaron Tinjum[redacted]
Sent: Tue 7/29/2025 1:49:29 PM (UTC-04:00)
To: Dan Diorio[redacted] Troncoso, Aaron[redacted]
Cc: Robinson, Samuel[redacted] Finkel, Jacob[redacted]
Subject: Re: [External] Re: Setting up a Conversation

Thanks, Aaron — I just sent a calendar invite to this email chain for next Tuesday, August 5 at 12:00 pm ET. Please feel free to forward to anyone else that should be included.

We look forward to connecting with you then.

Best,

Aaron

Aaron Tinjum
Vice President, Energy
Data Center Coalition
[redacted]
https://www.datacentercoalition.org

From: Dan Diorio <[redacted]
Sent: Monday, July 28, 2025 5:03 PM
To: Troncoso, Aaron <[redacted] Aaron Tinjum <[redacted]
Cc: Robinson, Samuel <[redacted] Finkel, Jacob <[redacted]
Subject: RE: [External] Re: Setting up a Conversation

4:30PM on Thursday or next Tuesday at 12pm-1PM work for me.

Thanks! Look forward to the conversation.

Dan

Dan Diorio
Vice President, State Policy
Data Center Coalition
[redacted] (mobile)
[redacted]
https://www.datacentercoalition.org
https://www.centerofyourdigitalworld.org/2025-impact-study
What do Data Centers do for You?

From: Troncoso, Aaron <[redacted]
Sent: Monday, July 28, 2025 3:35 PM
To: Aaron Tinjum <[redacted] Dan Diorio <[redacted]
Cc: Robinson, Samuel <[redacted] Finkel, Jacob <[redacted]
Subject: RE: [External] Re: Setting up a Conversation

Absolutely. Looks like this Thursday (between 11:30-1pm or 4-5pm) or next Tuesday (between 12-1pm or 3-4pm) would work well. Please let me know if either of those work for you two.

Looking forward to the conversation, and certainly open to discussing who else might make sense to include—thanks for your time!

Best,
Aaron

From: Aaron Tinjum <[redacted]
Sent: Monday, July 28, 2025 5:02 PM
To: Troncoso, Aaron <[redacted]
Cc: Dan Diorio <[redacted]
Subject: [External] Re: Setting up a Conversation

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.*

Hi Aaron,

Thank you very much for reaching out — I hope you are doing well!

We would welcome the opportunity for a quick call to learn more before participating in a broader conversation. Can you please let us know if you have any upcoming availability later this week or next week?

As an initial suggestion, we would also recommend including representation from co-location/multitenant data center companies that own and operate facilities throughout PJM. We are happy to help identify and suggest any additional participants as helpful.

Please let us know when you have a chance.

Best,

Aaron

Aaron Tinjum

Vice President, Energy

Data Center Coalition

[redacted]

[redacted]

https://www.datacentercoalition.org

From: Troncoso, Aaron <[redacted]
Sent: Friday, July 25, 2025 12:49 PM
To: Aaron Tinjum <[redacted] Dan Diorio <[redacted]
Subject: Setting up a Conversation

Dear Aaron and Dan,

I hope this email finds you well. Over the last several months, a set of states have been discussing how best to manage and enable the growth of new and significant sources of electricity load across the PJM region, which will increase demand for electricity over the coming years. Out of those conversations, our team here has identified a set of five specific actions, which we believe if undertaken by a new large load source would make that development much easier to manage.

I'm hoping to set up a staff-level conversation with you and a core group of your members (Google, AWS, Meta, Microsoft, and Oracle) to discuss the actions that we've come up with, and whether your members feel that this list captures a realistic set of high-value ideas.

We understand that having a consistent set of asks across the region is important to your members, and we also understand that speed is key. The aim of this staff-level conversation would be to lay the groundwork for principal-level sign-on from the states that have participated in these conversations thus far and your members to a joint letter outlining these ideas.

Please let me know if a staff-level meeting with that group of members would be possible in the coming weeks, and if you might have some time in advance of that for a quick call to set the stage with some of the ideas we've been discussing.

Best,

Aaron D. Troncoso

Senior Policy Advisor

Exhibit 7B

Governor's Policy Office & Department of Environmental Protection

[redacted] | [redacted]

Exhibit 7B

From:	Finkel, Jacob[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=607B30D05398433CAA0BF98BB78FA2B4-D2132AAE-04]
Location:	Microsoft Teams Meeting
Subject:	Accepted: DCC Intro Call
Importance:	Normal
Start Time:	Tue 8/5/2025 12:00:00 PM (UTC-04:00)
End Time:	Tue 8/5/2025 12:30:00 PM (UTC-04:00)
Required Attendees:	Aaron Tinjum

Exhibit 7B

From: Aaron Tinjum[redacted]

Sent: Fri 8/15/2025 2:51:01 PM (UTC-04:00)

To: Finkel, Jacob[redacted] Troncoso, Aaron[redacted] Robinson, Samuel[redacted]

Cc: Dan Diorio[redacted] Morgan Johnson[redacted]

Subject: Re: [External] Re: Setting up a Conversation

Attachment: 20250423-5244_DCC_Comments_EL25-49_4.23.25.pdf

Hi Aaron, Jacob, and Sam,

Thank you again for taking time to speak with us last week. Per our conversation, I wanted to follow up on three items:

1. Last week, E3 published a new whitepaper: "Balancing Risk and Growth: Best Practices for Utility Credit and Collateral Requirements for Large Load Customers." The whitepaper, which was sponsored by the Data Center Coalition, provides utilities, regulators, consumer advocates, and other key stakeholders with a modern, principles-based framework for credit and collateral best practices. The framework is based on five core principles: 1) Balance; 2) Equity; 3) Optionality; 4) Scalability; and 5) Adaptability. By promoting a balanced, holistic approach that distinguishes between perceived and actual risk, the whitepaper outlines actionable recommendations that can manage risk effectively while supporting modern economic growth.
2. I am also sharing a recent filing submitted by DCC in the PJM Show Cause proceeding at FERC related to co-located load arrangements (attached). The filing outlines DCC's guiding principles for responsible co-located load arrangements as well as some recommendations for improving PJM's load forecasting practices.
3. Finally, I wanted to highlight that DCC's Senior Energy Policy Manager Morgan Johnson (CCed) and I self-nominated to participate in the upcoming multi-state technical conference on PJM governance being held on September 22 in Philadelphia. A vast majority of DCC's member companies have infrastructure, operations, and teams in the PJM footprint, and we want to ensure all are represented in the discussions. PJM is a critically important entity in ensuring reliability while supporting economic growth, and DCC has directly engaged with PJM on a range of topics, including load forecasting improvements. While we recognize that grid planning and management is ultimately the role of utilities, grid operators, regulators, and policymakers, the data center industry is committed to working collaboratively as an engaged partner to help advance an affordable, reliable, and resilient electricity grid for all customers in PJM. We appreciate any consideration given to our nominations.

I hope this is helpful — please let me know if you have any questions or need any additional information.

Have a great weekend!

Best,

Aaron

Aaron Tinjum
Vice President, Energy
Data Center Coalition
[redacted]
https://www.datacentercoalition.org

From: Troncoso, Aaron <[redacted]
Sent: Monday, July 28, 2025 4:35 PM
To: Aaron Tinjum <[redacted] Dan Diorio <[redacted]
Cc: Robinson, Samuel <[redacted] Finkel, Jacob <[redacted]
Subject: RE: [External] Re: Setting up a Conversation

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Please let us know when you have a chance.

Best,

Aaron

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https://www.datacentercoalition.org

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Best,

Aaron D. Troncoso

Senior Policy Advisor

Governor's Policy Office & Department of Environmental Protection

[redacted] | [redacted]

Exhibit 7B

UNITED STATES OF AMERICA

BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C., et al.	)	Docket Nos. EL25-49-000
	)	
Large Loads Co-Located at Generating Facilities	)	Docket No. AD24-11-000
	)	
	)	
Constellation Energy Generation, LLC	)	Docket No. EL 25-20-000
	)	(Consolidated)

COMMENTS OF THE DATA CENTER COALITION

Pursuant to Rule 211 of the Federal Energy Regulatory Commission's (Commission) Rules of Practice and Procedure, 18 C.F.R. § 385.211, the Data Center Coalition (DCC), respectfully submits these formal comments in response to the Commission's February 20, 2025 Order Instituting Proceeding under Section 206 of the Federal Power Act and Consolidating with Other Proceedings (Show Cause Order).[1]

I. COMMUNICATIONS

Correspondence and communications regarding this filing should be directed to the following:

Aaron Tinjum
Vice President, Energy
Data Center Coalition
525-K East Market Street #253
Leesburg, VA 20176
[redacted]

Morgan A. Johnson
Senior Energy Policy Manager
Data Center Coalition
525-K East Market Street #253
Leesburg, VA 20176
[redacted]

II. INTRODUCTION

DCC submits these comments in response to the Commission's consolidated show cause order in the above-captioned dockets, which address the appropriate regulatory treatment of large loads—including data centers—that seek to co-locate with generation in the PJM footprint. This proceeding arises at a pivotal moment for the nation's energy grid and digital infrastructure, as regional grid operators face rising demand, constrained transmission capacity, increased local opposition to infrastructure development, and growing uncertainty around supply adequacy.

[1] *PJM Interconnection, L.L.C., et al.*, 190 FERC ¶ 61,115 (2025).

Exhibit 7B

Data centers are foundational to the modern economy and digital society. They support essential services across nearly every sector, including finance, healthcare, education, communications, manufacturing, defense, and government. As the backbone of the nation's digital infrastructure, data centers host the computing platforms that power artificial intelligence and machine learning workloads, cybersecurity systems that protect critical institutions, and data processing capabilities relied upon by federal agencies and national security entities. These facilities support real-time digital operations that are now inseparable from the functioning of core public and private systems.

In recent years, energy demand has accelerated—driven by AI development, cloud computing, electrification of buildings, industry and transportation, hydrogen fuel production, and the reshoring of U.S. advanced manufacturing. This has created a step change in electricity needs, particularly in regions like PJM, where demand is outpacing outdated planning frameworks. Data center operators are responding with urgency—but face growing constraints from generator interconnection delays, opaque infrastructure planning, and limited transparency into available capacity.

In this context, co-location of load with generation—whether front-of-the-meter or behind-the-meter—is a pragmatic, common, and commercially legitimate strategy to secure timely access to power as markets grapple with years-long interconnection queue backlogs. These arrangements provide critical flexibility and efficiency, enabling data center developers to meet emerging needs on faster timelines and without undue reliance on already-congested grid infrastructure.

At the same time, it is clear that the current regulatory focus on co-location stems less from the structure of these arrangements themselves and more from broader system concerns—specifically, whether there will be sufficient capacity to meet demand in the years ahead. In a more balanced resource environment, co-location would likely be viewed as a beneficial tool, not a policy concern. Indeed, co-location can reduce transmission congestion, avoid costly infrastructure buildouts, and enable the more efficient interconnection of new resources. But amid tightening margins, it has become a stand-in for deeper anxiety about supply adequacy and planning accuracy.

These underlying concerns deserve attention. Rather than restricting or reclassifying commercially valuable arrangements like co-location, the Commission should focus on strengthening the planning and forecasting tools that drive regional infrastructure decisions. Getting this right requires better visibility into both expected load growth and anticipated supply—and a regulatory framework that evolves with changing market dynamics.

DCC strongly believes that this proceeding can and should be resolved through constructive, timely dialogue among affected stakeholders. To that end, and consistent with the Commission's longstanding preference for settlement where feasible,[2] DCC joins other parties in this proceeding seeking that the Commission establish settlement judge procedures and stay these proceedings for a 90-day period.[3] The requested process would facilitate focused, good faith negotiations under Commission oversight, with the aim of achieving clarity, preserving reliability, and supporting just and reasonable outcomes for all parties.

The Commission now has the opportunity to modernize its approach in a manner that reinforces reliability, preserves commercial flexibility, and supports efficient investment. To assist in that effort, these comments: (1) reaffirm DCC's co-location principles previously submitted into the record;[4] (2)

---

[2] *See*, *e.g.*, *Certification of Uncontested Settlements by Settlement Judges*, Order No. 883, 179 FERC ¶ 61,130, at P 2 (2022) ("The Commission has long recognized the importance of settlements among the participants to litigated proceedings as a tool to efficiently and expeditiously resolve those contested proceedings set for trial-type evidentiary hearing, as well as other contested proceedings." (footnote omitted)); *Ariz. Pub. Serv. Co.,* 97 FERC ¶ 61,315, at 62,449 (2001) ("[I]t has been Commission policy to promote voluntary settlements as an important tool in the administration of our jurisdictional responsibilities."); *Tex. Gas Transmission Corp.*, 28 FERC ¶ 61,372, at 61,665-66 (1984) (encouraging settlements, as they can play an important part in resolving issues without prolonged and contentious litigation); *cf. Tex. E. Transmission Corp. v. FPC*, 306 F.2d 345, 347-48 (5th Cir. 1962) ("For Commission approved voluntary settlements are an important and desirable mechanism as the Commission undertakes the staggering burden of dealing with the ceaseless flow of the ever-more complicated problems….Consequently settlements should be encouraged, not discouraged." (footnotes omitted)).

[3] *See, e.g.*, Joint Comments and Motion to Stay Proceedings and Request to Establish Settlement Judge Procedures of the Electric Power Supply Association, the PJM Power Providers Group, Calpine Corporation, Cogentrix Energy Power Management, LLC, Constellation Energy Generation, LLC, and LS Power Development, LLC, Docket Nos. EL25-49-000, EL25-20-000, and AD24-11-000 (Apr. 22, 2025), Accession No. 20250422-5166 (requesting that the Commission find the PJM Tariff unjust and unreasonable, stay the consolidated proceedings, and initiate a 90-day settlement judge process to develop a replacement rate).

[4] *Statement of Aaron Tinjum on Behalf of the Data Center Coalition*, Docket No. AD24-11-000, at Panel 1 (Nov. 4, 2024), Accession No. 20241104-4011.

clarify the nature and benefits of co-located arrangements; (3) respond to stakeholder concerns raised in this proceeding; and (4) offer targeted recommendations to improve forecasting, tariff clarity, and planning alignment.

Together, these actions will help ensure that emerging load arrangements are addressed in a manner that is fair, transparent, and aligned with the long-term public interest.

II. REINFORCING DCC'S ESTABLISHED CO-LOCATION PRINCIPLES

DCC has previously submitted testimony identifying six core principles that should guide the regulatory treatment of co-located load arrangements.[5] These principles reflect the realities of current market conditions and the commercial, technical, and operational drivers behind co-location. As the Commission considers whether and how to clarify the application of open access and cost allocation rules to these arrangements, it is critical that any resulting framework remain consistent with the following tenets:

- **Preserving Open Access and Commercial Flexibility**:
  Large Loads, particularly data center operators, must retain the ability to pursue behind-the-meter (BTM) and other innovative configurations consistent with applicable rules and operational requirements. Regulatory frameworks that eliminate or disincentivize these options will reduce market efficiency, delay investment, and risk distorting otherwise beneficial commercial arrangements.

- **Ensuring Grid Reliability and Fair Cost Allocation**:
  Co-location should be subject to appropriate grid impact assessments and planning oversight. Where transmission or distribution upgrades are required to accommodate a co-located arrangement, cost responsibility should be allocated to the parties that benefit—consistent with cost causation principles. Avoiding cost shifts to other customers is both feasible and necessary to maintain confidence in these arrangements.

- **Maintaining Consistency with Prior Commission Guidance**:
  Co-location arrangements are not new. Commission precedent supports flexibility in load-serving arrangements and does not impose a single configuration or cost allocation methodology. DCC urges the Commission to reinforce that principle while allowing for further clarity where operational questions arise.

[5] *Id* at 4.

- **Recognizing Co-location as a Legitimate Response to Infrastructure Constraints**: These arrangements are not a means of avoiding planning processes or cost responsibility. Rather, they reflect the practical need for large new loads—such as data centers—to access power in a timely manner amid system congestion and long interconnection timelines. That commercial motivation should be acknowledged and appropriately integrated into regulatory expectations.

- **Aligning Regulatory Treatment with Grid and Market Realities**: As PJM and other regions experience rapid load growth and limited infrastructure headroom, enabling flexible, efficient service arrangements like co-location can help alleviate pressure on the broader system. Regulatory approaches that support, rather than restrict, these configurations will better serve both reliability and affordability objectives.

DCC respectfully refers the Commission to its technical conference testimony[6] for the full articulation of these principles, including additional discussion of community engagement, environmental considerations, and innovation. These principles are not theoretical—they are grounded in the real-world operational experience of data center developers, owners, and operators seeking to support digital infrastructure while maintaining compliance with evolving grid requirements.

As this proceeding moves forward, DCC urges the Commission to use these principles as guideposts for evaluating tariff language, assessing stakeholder proposals, and crafting regulatory clarity that is durable, consistent, and adaptable to continued growth.

III. CLARIFYING THE NATURE OF CO-LOCATION

Co-location is a commercial arrangement—not a system problem. It enables load and generation to be sited together in ways that facilitate timely power delivery, reduce dependence on constrained transmission systems, and enhance investment certainty. These arrangements involve sophisticated engineering, contractual, and regulatory compliance components. When properly structured, they can preserve and improve overall grid reliability while expanding the set of viable options available to new large loads.

The increased scrutiny of co-located load in the PJM footprint is not primarily about the nature of the arrangement itself. Rather, it reflects growing concern about tightening resource adequacy margins,

---

[6] *Id.*

interconnection queue delays, an increasingly congested transmission grid, and the adequacy of grid operators' planning tools in the face of rapid demand growth. In a more balanced supply environment, co-location would likely be viewed as a beneficial market response to reduce expensive transmission upgrades. However, against the backdrop of constrained capacity and delayed infrastructure development, co-location has become a focal point for concerns about whether the grid can meet emerging load requirements at all, rather than being seen as a possible solution in PJM's toolbox.

This misdirected focus risks clouding policy decisions. Renewed interest in co-location is not the cause of planning strain—it is a symptom of it. The urgency surrounding this docket is not because co-location arrangements evade responsibility or undermine grid operations, but because they are advancing more quickly and visibly than the traditional processes for bringing on new generation or transmission infrastructure. That visibility has made co-location a convenient—yet misplaced—target for broader anxieties about system adequacy.

DCC urges the Commission to avoid adopting prescriptive or overly restrictive frameworks that wrongly conflate co-location with systemic risk. Instead, the Commission should focus on strengthening the underlying tools that support sound system planning—improved transmission planning, timely generator interconnection, and the accuracy and transparency of load forecasting processes.

Ultimately, the challenge before the Commission is not whether co-location should be allowed—it should—but how to ensure that planning frameworks are modernized to reflect new load patterns and enable timely response of new generation to meet new load.

As discussed in the next section, improving the transparency and accuracy of load forecasting—particularly around large, non-traditional load additions—is critical to aligning infrastructure investment with real-world demand. Mischaracterizing co-location as a mere workaround risks obscuring the actual planning failure: the inability to systematically and reliably forecast what load is coming, when, and how and enable the marketplace and transmission planners to respond effectively.

IV. RESPONSE TO FERC'S SHOW CAUSE ORDER AND STAKEHOLDER POSITIONS

DCC appreciates the Commission's attention to the complex issues raised in this proceeding and supports the development of a regulatory framework that provides clarity, preserves commercial flexibility, and protects reliability. The Commission's February 20, 2025, show cause order—alongside stakeholder comments and PJM's subsequent filings—underscores the need for a coherent, transparent, and durable approach to co-location arrangements, especially as they become more prevalent across the PJM footprint.

DCC acknowledges PJM's recognition, in its Answer and Exhibit A, that multiple viable configurations of co-located load and generation exist today, including both front-of-meter and behind-the-meter designs. However, DCC emphasizes that these configurations must not only be acknowledged—they must be *explicitly supported* in PJM's tariff to provide developers and large customers with the certainty necessary to proceed with time-sensitive projects. Regulatory silence or ambiguity creates risks for all parties involved and invites inconsistent application by Transmission Owners (TOs).

To that end, the Commission should direct PJM to develop clear, enforceable tariff language that affirms the permissibility of multiple co-location configurations, including those where load is served directly from a generation resource located on or near the same site. Tariff clarity is essential to reduce unnecessary disputes, avoid case-by-case confusion, and enable transmission providers to process interconnection and load addition requests efficiently and predictably.

DCC also responds to arguments advanced by certain TOs advocating for the universal classification of co-located load as Network Load, regardless of configuration or actual reliance on the grid. This categorical approach is both overbroad and unworkable. It risks undermining legitimate commercial arrangements, misaligning cost allocation, and chilling innovation. Rather than applying a one-size-fits-all label, the Commission should instead require PJM to adopt a criteria-based framework

that evaluates co-located load based on specific, fact-driven indicators—such as the nature of grid reliance, services taken, and metering configuration.

Such a framework can preserve open access and nondiscrimination while reflecting the physical and operational distinctions among co-location designs. It would also reduce the likelihood of cost-shifting and ensure that grid services are paid for by those who use them, consistent with long-standing cost causation principles.

Finally, given the contested nature of the issues raised and the diversity of views among stakeholders, DCC strongly supports the initiation of expedited settlement procedures. The Commission should place these consolidated proceedings into a structured, 90-day settlement process overseen by a Commission-appointed settlement facilitator or settlement judge. This would allow PJM, TOs, large load customers, and other interested parties to engage in a focused and facilitated dialogue aimed at expeditiously resolving the most contentious issues, including tariff clarity, network service classification, and the integration of co-located load into planning processes.

Structured settlement procedures have proven effective in prior PJM-related proceedings and offer the best chance of achieving a workable and broadly supported resolution in a timely manner. DCC is actively participating in a joint motion requesting the establishment of such procedures and encourages the Commission to grant that request.

V. RECOMMENDATIONS FOR IMPROVED LOAD FORECASTING

As emphasized throughout these comments, many of the concerns raised in this proceeding—particularly around co-location—are rooted not in the technical structure of load-generation arrangements, but in broader questions of resource adequacy. The current sense of urgency around how load is served reflects a deeper and more consequential challenge: planning frameworks have not kept pace with accelerating demand, and current load forecasting practices are failing to provide the transparency, consistency, and reliability needed to support sound infrastructure investment.

Exhibit 7B

Effective load forecasting is not merely a technical input—it is a foundational requirement for ensuring long-term grid reliability, resource adequacy, and cost-effective transmission development. When forecasts are too high, they can lead to inflated capacity prices, trigger unnecessary transmission buildouts, and result in stranded or underutilized assets. When forecasts are too low, the consequences are even more severe: insufficient capacity procurement, underinvestment in transmission, and a persistent cycle of short-term emergency responses rather than long-term strategic planning.

While no forecast will ever be perfect, the Commission must take steps to modernize load forecasting practices across all levels of the system and hold PJM accountable for ensuring its forecasts reflect the best available data and methods.

PJM currently builds its long-term forecast using an in-house econometric model but supplements this forecast with large load additions reported by TOs and electric distribution companies. These supplemental values—presented annually in Table B-9—often reflect inconsistent assumptions, are not subject to standardized validation, and lack meaningful transparency. Yet they are incorporated directly into forecasts that drive capacity procurement and transmission planning outcomes.

Although PJM cannot control how load is interconnected at the distribution level—a process governed by state jurisdiction—it is responsible for the integrity of its forecast. This includes ensuring that reported large load additions are vetted for commercial viability and reasonably reflect actual development timelines. That responsibility cannot be delegated, nor excused by reference to differing utility practices.

To that end, DCC urges the Commission to require the following forecasting reforms:

1. **Commercial Readiness Verification for Large Load Additions**:
   For any load adjustment of 50 MW or greater submitted for inclusion in PJM's forecast, the submitting entity should demonstrate indicators of commercial viability. These could include attestations to executed service agreements, site control, permitting progress, or other objective milestones.[7] Criteria should be firm enough to exclude purely speculative additions, but not so inflexible such as to exclude genuine proposals reaching commercial readiness. This approach mirrors the readiness criteria applied in generator interconnection processes and ensures the

[7] PJM, PUCs and the TOs may be best suited to identify objective milestones but these should be transparent and effective indicators of commercial viability.

forecast reflects realistic development trajectories. This would not impose such structures within the TO and EDC load interconnection process–instead it would provide discipline and consistency to what PJM does with the request for the large load adjustment.

2. **Transparency of Forecast Assumptions**:
   PJM should be required to publicly disclose the key assumptions, data sources, and validation processes underlying both its base forecast and supplemental inputs. This would enable stakeholders to engage more effectively and improve accountability in planning processes.

3. **Reporting Standardization Across TOs and EDCs**:
   The Commission should direct PJM to develop clear and enforceable standards for how member utilities report anticipated load additions, including data quality, documentation, information about associated transmission needs, including supplemental projects, and regular revalidation. A common framework would reduce uncertainties and improve the comparability of load inputs across PJM's footprint.

4. **Regular Forecast Review and Backcasting Analysis**:
   PJM should conduct annual assessments comparing past forecasts to actual outcomes (backcasting) to identify sources of error and improve future performance. These assessments should be shared with stakeholders and posted for public review.

These reforms would significantly improve the accuracy and integrity of PJM's load forecast while preserving flexibility for utilities and customers. They would also ensure that co-located arrangements—whether grid-connected or BTM—are integrated into forecasts in a manner that reflects actual system impacts rather than assumption-driven speculation.

Importantly, these changes would simply refine the process that PJM currently uses to verify large load adjustments before adding them to its annual load forecast. PJM would only accept large load additions into its forecast that the EDC demonstrates verifiable commercial viability. This approach to load forecasting is a non-arbitrary, non-discriminatory way to inject discipline into PJM's load forecast by ensuring that requesting customers are commercially ready. It also incentivizes participation from end use customers and the EDCs because PJM's transmission planning processes will accurately reflect the appropriate level of investment to reliably meet expected demand.

PJM has the authority today to implement this approach through its load forecasting business practice manual without changes to its current tariff and other governing documents.

Under PJM's Manual 19, PJM must verify that proposed load adjustments are "real and significant."[8] To manage the near term risk of significant capacity and transmission-driven cost increases over the next 5-8 years, PJM should only include in the load forecast requested load adjustments due to new large load requests (50 MW or greater) when the requesting EDC/LSE demonstrates that the large load interconnections are backed by stringent financial commitments.

Ultimately, strengthening load forecasting is a prerequisite to resolving not just the questions raised in this docket, but the broader resource adequacy and infrastructure planning challenges PJM now faces. The Commission has an opportunity—and a responsibility—to lead this reform.

VI. ENHANCED VISIBILITY INTO SUPPLEMENTAL PROJECTS AND REGIONAL LOAD DEVELOPMENT

As PJM continues to experience significant growth in large load additions it is essential that planning processes reflect how infrastructure is evolving to serve this demand. While many of the upgrades necessary to support new load are pursued through supplemental projects initiated by TOs, additional transparency can improve alignment between infrastructure development and PJM's system-level forecasts and planning efforts.

Specifically, DCC recommends that the Commission direct PJM to enhance visibility into the relationship between new large loads and the transmission upgrades that support them, by requiring the following:

1. **Disclosure of Load Linkages for Supplemental Projects**:
   For any supplemental project developed primarily to support new large load, the responsible entity should indicate whether the project is associated with a specific customer load addition. This disclosure should include the general location of the load, the expected service date, and a qualitative description of the anticipated ramp-up schedule. This information would help PJM and stakeholders understand emerging demand patterns without compromising commercially sensitive data.

2. **Confirmation of Forecast Inclusion**:
   When a supplemental project is identified as being load-driven, PJM should confirm whether the associated load has already been incorporated into its system-level forecast, including Table B-9.

[8] *See* PJM Manual 19: Load Forecasting and Analysis, Attachment B at 26 (Rev. 37, effective Dec. 18, 2024) (requiring PJM to verify that any proposed load adjustment is "real and significant").

If the load is not reflected in the forecast, PJM should indicate whether it expects it to be incorporated in the next forecast update and on what basis.

These modest improvements would help ensure that infrastructure decisions made at the local level are visible within broader planning discussions and appropriately reflected in resource adequacy and transmission assessments. They would also support more accurate forecasting and reinforce stakeholder confidence in the alignment between load growth and infrastructure investment.

VII. SPECIFIC RECOMMENDATIONS TO THE COMMISSION

In light of the issues raised in this proceeding and the recommendations outlined in the sections above, the Data Center Coalition respectfully urges the Commission to take the following actions to support a durable, transparent, and flexible framework for co-located load:

1. **Affirm the Legitimacy of Co-location**:
   Confirm that co-location—whether behind-the-meter or front-of-meter—is a commercially legitimate and operationally viable arrangement, consistent with open access principles and not inherently inconsistent with reliability or cost causation.

2. **Direct PJM to Provide Tariff Clarity**:
   Require PJM to develop and file clear, enforceable tariff language that supports multiple viable co-location configurations and avoids default classifications that mischaracterize grid usage or constrain commercial flexibility.

3. **Reject One-Size-Fits-All Treatment of Network Load**:
   Decline to endorse stakeholder proposals that would universally categorize all co-located load as Network Load. Instead, require PJM to establish criteria that evaluate grid reliance and service characteristics on a fact-specific basis.

4. **Initiate Expedited Settlement Procedures**:
   Place these consolidated proceedings into a 90-day settlement process supervised by a Commission-appointed settlement judge, with the goal of resolving outstanding disputes related to co-location configurations, tariff treatment, and cost allocation.

5. **Improve Large Load Forecasting Practices**:
   Direct PJM to implement commercial readiness criteria for all forecasted load additions of 50 MW or greater, ensure consistency across TOs and EDCs, and increase transparency around forecasting assumptions and methodologies.

These recommendations are designed to help the Commission provide needed regulatory clarity, avoid unnecessary market disruptions, and ensure the planning process is aligned with current and emerging system needs.

VIII. CONCLUSION AND SUMMARY OF KEY REQUESTS

The issues raised in this proceeding lie at the intersection of rapidly evolving load growth, strained infrastructure, and regulatory frameworks that must adapt to new market realities. Co-location arrangements are not the cause of grid stress—they are a rational, flexible, and increasingly necessary response to it. Rather than restricting these arrangements, the Commission should seize this opportunity to clarify their legitimacy, reinforce open access principles, and ensure that planning tools are modernized to reflect the scale and pace of change in electricity demand.

To that end, the Data Center Coalition respectfully urges the Commission to:

- **Affirm the legitimacy of co-location arrangements** and the right of large customers to pursue service through behind-the-meter and other commercially viable configurations;
- **Direct PJM to develop clear tariff language** supporting multiple co-location models and avoid prescriptive classifications that reduce flexibility;
- **Reject proposals to universally classify co-located load as Network Load**, and instead require PJM to apply criteria that reflect actual grid reliance;
- **Initiate a 90-day settlement process**, appointing a settlement judge to assist parties in resolving contested issues around tariff language, service classification, and cost allocation;
- **Improve large load forecasting processes** by requiring readiness criteria, increased transparency, and standardized inputs across utilities; and
- **Enhance visibility into large load additions and associated infrastructure**, including confirmation of whether new loads tied to supplemental projects are reflected in PJM's official forecast.

These steps are essential to ensuring that regulatory treatment of co-located load is fair, transparent, and aligned with long-term grid reliability and economic growth. DCC appreciates the

Commission's attention to these comments and respectfully requests timely and decisive action consistent with the recommendations set forth herein.

Respectfully Submitted,

/s/ Aaron Tinjum
Aaron Tinjum
Vice President, Energy
Data Center Coalition
525-K East Market Street #253
Leesburg, VA 20176
[redacted]

Morgan A. Johnson
Senior Energy Policy Manager
Data Center Coalition
525-K East Market Street #253
Leesburg, VA 20176
[redacted]

Exhibit 7B

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding. Dated at Herndon, VA this 23 day of April 2025.

/s/ Morgan A. Johnson
Morgan A. Johnson
Senior Energy Policy Manager
Data Center Coalition
525-K East Market Street #253
Leesburg, VA 20176
[redacted]

From: Siger, Rick[redacted]
Sent: Tue 10/7/2025 8:14:57 PM (UTC-04:00)
To: Ford, Becky[redacted] Ruby, Kara[redacted]
Cc: Simons, Will[redacted] Anderson, Kayla[redacted] Backover, Justin[redacted] Ickes, Penny[redacted] Ross, Brian[redacted] Okai, Danielle[redacted] Warren, Amanda[redacted] Wade, David[redacted] Madrid, Merle[redacted] Grisham, Preston[redacted]
Subject: Re: [External] RE: AWS <-> PA Comms Connect / close hold

Hi Becky –

Thanks so much for getting back and sorry for a delayed response after a long day.

The request is for an in-person event, ideally at one of the SITES (I am partial to Hazelnut given its larger and a fast track site).

I'll let my Governor's office colleagues chime in on the October 17 date and of course we understand there continue to be active conversations that will impact timing.

To get a call on the books, I'm adding the great Kara Ruby; let's try to find 30 minutes this week to advance the conversation.

Best,

Rick

From: Ford, Becky <[redacted]
Date: Monday, October 6, 2025 at 5:59 PM
To: Siger, Rick <[redacted]
Cc: Simons, Will <[redacted] Anderson, Kayla <[redacted] Backover, Justin <[redacted] Ickes, Penny <[redacted] Ross, Brian <[redacted] Okai, Danielle <[redacted] Warren, Amanda <[redacted] Wade, David <[redacted] Madrid, Merle <[redacted] Grisham, Preston <[redacted]
Subject: [External] RE: AWS <-> PA Comms Connect / close hold

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+Merle and Preston

Rick,

Thank you. I made a few notes in red below. Would it be possible to confirm if the request is for a press release only, or an organized event? As mentioned in our previous conversation there a few contractual issues that determine our timeline for a public announcement.

We should definitely get on a call to keep working the details, I will have an update on timeline by 12pm tomorrow.

Kind regards
Becky

Becky Ford I Economic Development
AWS Infrastructure Global Expansion
E: [redacted] M: +[redacted]

-----Original Message-----
From: Siger, Rick <[redacted]
Sent: Monday, October 6, 2025 12:45 PM
To: Ford, Becky <[redacted]
Cc: Simons, Will <[redacted] Anderson, Kayla <[redacted] Backover, Justin <[redacted] Ickes, Penny <[redacted] Ross, Brian <[redacted] Okai, Danielle <[redacted] Warren, Amanda <[redacted] Wade, David <[redacted]
Subject: [EXTERNAL] AWS <-> PA Comms Connect / close hold

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Hi Becky –

I hope you are well, and I'm looking forward to seeing you in Berwick later this week.

As discussed late last week, I'm connecting you here with a cast of many from the PA side to begin coordination on announcement planning. Specifically, I learned from our team today that we'd like to suggest October 17 as an option. Is there a specific driver for this date?

Of course, please loop in the key folks from your team who are most relevant to this effort as well. For our internal team, here is the status of our core messages (subject of course Becky to your feedback):

1. We will be announcing the next two sites in AWS' innovation campus build out in PA – one in Kline Township, Schuylkill County, and one in Hazle Township, Luzerne County (also known as project Hazelnut, an OTO fast-track project). These will be positioned as additional sites to fulfill the initial $20 billion, 1250 job commitment announced in June.

1. On the AWS side, in addition to the two new locations, you are prepared to announce:

* A "progress report" on our June announcement, including permanent and construction jobs created, capital invested, tax revenues realized at the state and local level, and indirect impacts; we currently have estimated AWS jobs, 2025 payroll, and capital investment for Salem Township and Falls Township sites (I do not have permission to disclose, approval is not guaranteed and may require additional time). I have estimates on local property tax, but we would need to work together on "other" tax revenue (ex. local wage tax, transfer tax, sales and use tax not exempt under CDC program, etc.)
* A new reclaimed water system to be deployed specifically at Hazle (AWS can elaborate further), which saves energy and water; yes, we can discuss on the call.
* AWS will provide funding for a new waterline in Beech Haven (Salem Township) to provide 100+ residents with potable water (many are currently using unsafe wells)
* Within the next 30 days AWS will release a ~$5M Community Benefit Payment to Salem Township as part of our CBA. Similar community benefit agreements have been negotiated with Kline Township and Hazel Township (the CBA's are not public yet)

and

* A set of community-focused investments in the Hazleton area similar to those announced at the June event in Berwick. We have a list of organizations that applied for and received grant funds from our Community Investment Fund announced in June (the recipient organizations are located in Luzerne, Columbia, and Bucks County)

1. On the PA side, we would ideally like to be prepared to announce:

* $10 million in investments into workforce partners we first announced at the Salem Township site (this will require some rapid work over the next couple weeks to land a comprehensive plan).
* (tentative) ongoing progress regarding partnerships between PA's research universities and AWS to make cutting-edge compute available to PA-based researchers and startups.

That's all for now – I hope this helps rekindle the excellent collaboration we saw between our teams for the first announcement. We are grateful for the continued investment!

Best,

Rick

[cid:image001.png@01DC3480.AA914E60]
Rick Siger | Secretary
PA Department of Community & Economic Development Commonwealth Keystone Building
400 North Street, 4th Floor | Harrisburg, PA 17120-0225
P: [redacted] | E: [redacted] <mailto:[redacted]20> |

dced.pa.gov<http://www.dced.pa.gov>

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Exhibit 7B

From: Wade, David[redacted]

Sent: Tue 11/11/2025 10:48:19 AM (UTC-05:00)

To: Kirshner, Benjamin[redacted] Siger, Rick[redacted] Ross, Brian[redacted] Okai, Danielle[redacted] Kostival, Ryan C[redacted] Tarquino, Michelle[redacted]

Subject: project hazelnut

All,

The land development plan for project hazelnut was tabled last night by the township. It's unclear if it is just being put on hold temporarily or if the public opposition is pushing the local supervisors to re-think their support. Northpoint expects to hear more from the township later today and I'll pass on whatever info they get about next steps.

https://www.2822news.com/news/local-news/outcry-grows-over-proposed-data-center-campus/

Thanks,
David

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From: Finkel, Jacob[redacted]
Sent: Fri 11/14/2025 5:39:29 AM (UTC-05:00)
To: Rumsey, Amanda N[redacted] Stern, Alexander:(Exelon)[redacted] Pamela Quinlan[redacted] Connor Shinn -GOV-[redacted]
Cc: Troncoso, Aaron[redacted] Bautista, Alejandro:(Exelon)[redacted] Shannon Frede -MEA-[redacted] ryan.opsal[redacted] Litynski, Jackie[redacted] Simeone, Christina[redacted] Robinson, Samuel[redacted] Ghattas, Monica:(Exelon)[redacted] Sauer, William J:(Exelon)[redacted] Fabiano, Janell Leilani[redacted] Morgan Johnson[redacted] Preethy Thangaraj[redacted] Miller, Eric [GOV][redacted] Davis, Glenn (Energy)[redacted]
Subject: Re: [External] Re: [EXTERNAL]Prep Session - Pre Stage 4 Meeting

Works here, thanks. And adding our colleagues in New Jersey and Virginia in case they can join as well.

From: Rumsey, Amanda N <[redacted]
Date: Thursday, November 13, 2025 at 5:04 PM
To: Stern, Alexander:(Exelon) <[redacted] Pamela Quinlan <[redacted] Connor Shinn -GOV- <[redacted]
Cc: Troncoso, Aaron <[redacted] Bautista, Alejandro:(Exelon) <[redacted] Shannon Frede -MEA- <[redacted] ryan.opsal <[redacted] Finkel, Jacob <[redacted] Litynski, Jackie <[redacted] Simeone, Christina <[redacted] Robinson, Samuel <[redacted] Ghattas, Monica:(Exelon) <[redacted] Sauer, William J:(Exelon) <[redacted] Fabiano, Janell Leilani <[redacted] Morgan Johnson <[redacted]
Subject: [External] Re: [EXTERNAL]Prep Session - Pre Stage 4 Meeting

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Great idea, Pamela. I can make 3:30 Tuesday work.

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Business Use

From: Stern, Alexander:(Exelon) <[redacted]
Sent: Thursday, November 13, 2025 4:54:07 PM

To: Pamela Quinlan <[redacted] Connor Shinn -GOV- <[redacted]
Cc: Troncoso, Aaron <[redacted] Bautista, Alejandro:(Exelon) <[redacted] Shannon Frede -MEA- <[redacted] ryan.opsal <[redacted] Finkel, Jacob <[redacted] Litynski, Jackie <[redacted] Simeone, Christina <[redacted] Robinson, Samuel <[redacted] Ghattas, Monica:(Exelon) <[redacted] Sauer, William J:(Exelon) <[redacted] Rumsey, Amanda N <[redacted] Fabiano, Janell Leilani <[redacted] Morgan Johnson <[redacted]
Subject: RE: [EXTERNAL]Prep Session - Pre Stage 4 Meeting

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I can make 3:30 pm Tuesday work. Good suggestion. Thanks, Pamela!

~ Alex

Alexander C. Stern
Director RTO Relations & Strategy
[redacted]

(M) [redacted]

exelon | atlantic city electric | bge | comed | delmarva power | peco | pepco

exeloncorp.com

From: Pamela Quinlan <[redacted]
Sent: Thursday, November 13, 2025 4:51 PM
To: Connor Shinn -GOV- <[redacted]
Cc: Stern, Alexander:(Exelon) <[redacted] Troncoso, Aaron <[redacted] Bautista, Alejandro:(Exelon) <[redacted] Shannon Frede -MEA- <[redacted] ryan.opsal <[redacted] Finkel, Jacob <[redacted] Litynski, Jackie <[redacted] Simeone, Christina <[redacted] Robinson, Samuel <[redacted] Ghattas, Monica:(Exelon) <[redacted] Sauer, William J:(Exelon) <[redacted] Rumsey, Amanda N <[redacted] Morgan Johnson <[redacted]
Subject: [EXTERNAL]Prep Session - Pre Stage 4 Meeting

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Hi all –

I think we should find some time ahead of next Wednesday to align on our plan for the presentation. Recognizing there are a lot of folks on this list to coordinate, I was thinking Tuesday afternoon.

Would 3:30 work for everyone? If we don't have critical mass, we can find another time — but wanted to float this as a first option.

Thanks,
Pamela

Pamela Quinlan
Principal, GQS New Energy Strategies.
www.GQSenergy.com
[redacted]

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Exhibit 7B

From: Wade, David[redacted]

Sent: Tue 11/18/2025 5:09:55 PM (UTC-05:00)

To: Siger, Rick[redacted]

Cc: Deitrich, Scott[redacted] Ross, Brian[redacted] Vernon, Brent[redacted] Kirshner, Benjamin[redacted]

Subject: Coreweave Lancaster Data Center

Attachment: Lancaster City Council to consider data center benefits agreement on Thursday _ Local News _ lancasteronline.com[34].pdf

Sec. Siger,

The latest news out of Lancaster it that the developer reached a deal with the City of Lancaster on a CBA and a special vote by Council is set for Thursday night. Details of the deal from the City government are here: https://www.cityoflancasterpa.gov/data-center/ The attached article also provides some color. Happy to follow up on any additional questions you may have.

Thanks,
David

--
David Wade
Chief of Staff
Office of Transformation and Opportunity
Pennsylvania Governor's Office
[redacted]

https://lancasteronline.com/news/local/lancaster-city-council-to-consider-data-center-benefits-agreement-on-thursday/article_3cbeae2f-c584-4034-83e6-b82273d7304c.html

Lancaster City Council to consider data center benefits agreement on Thursday



CHRIS REBER | Staff Writer

Nov 18, 2025

1 of 9



Lancaster Mayor Danene Sorace listens to a question during a press conference about the community benefits agreement between the city and Chirisa Technology parks for the Lancaster city data centers on Tuesday, Nov. 18, 2025.

SUZETTE WENGER | Staff Photographer

A combined $20 million in funding for economic development and sustainability in Lancaster city, and a commitment to use renewable energy are among the benefits being offered by data center developers in an agreement residents will be able to weigh in on when city council discusses it on Thursday.

A special meeting to consider and potentially approve the agreement is scheduled for 6 p.m. Thursday at city hall, 120 N. Duke St.

Mayor Danene Sorace on Tuesday presented details from the community benefits agreement negotiated with Chirisa Technology Parks for the proposed data center campuses at 216 Greenfield Road and 1375 Harrisburg Pike. The full text of the agreement is available online at lanc.news/BenefitsAgreement.

Sorace said that the agreement includes benefits far beyond what could be accomplished through zoning and is atypical among Pennsylvania communities. It includes regulations on water usage, noise and clean energy.

"It not only protects our environment and quality of life, but also invests directly in Lancaster city sustainability goals and its future economic development," Sorace said.

IF YOU GO

Lancaster city council will hear plans for the data centers during its meeting on Thursday at 6 p.m. in the Nelson M. Polite Sr. council chambers, 120 N. Duke St.

Exhibit 7B

The agreement between the city and the data center owners is good for 20 years, and would still apply if the data center properties are sold to another entity. Sorace said the financial obligations will be secured by letters of credit, and the environmental protections can be enforced by court action, including shutting down the centers' operations if they fail to comply.

The centers, which have a combined construction budget of $10 billion, have faced opposition from residents over environmental impact and because they got zoning approval without facing a vote or any public discussion. A resident has appealed the zoning approval, however Chirisa has filed a lawsuit to invalidate the appeal.

The agreement says that the city's proposed new rules for data centers – which include requiring zoning hearing board approval and public input for any data centers to move forward – would not apply to the Greenfield Road and Harrisburg Pike sites, as long as the owners submit their land development plans within two years. Plans for the Harrisburg Pike project would have to go before the city's planning commission.

Mayor-elect Jaime Arroyo, who will succeed Sorace in January, wasn't present at Tuesday's press conference. Sorace said that as council vice president, Arroyo has been updated on negotiations along with council President Amanda Bakay.

LNP | LancasterOnline contacted all members of city council for comment on the proposal. Amanda Bakay wrote in an email that she plans to support it because of its commitments on clean energy, and because the quality of life protections go far beyond what the zoning ordinance could provide.

"It will be in our best interest to move forward and ensure the highest level of accountability, and I will vote to approve the agreement," Bakay wrote.

Councilor Janet Diaz wrote in an email that she is still reviewing the agreement and won't reveal how she plans to vote until she has a chance to discuss it with the rest of council on Thursday.

"I'm evaluating the enforceability of these new standards, the long-term impact on nearby residents and neighborhoods, and whether the commitments in the CBA provide meaningful and measurable benefits to the community," Diaz wrote.

Here's what's included in the new agreement:

Grant funding

The data center owners have agreed to pay a combined $20 million toward local grant programs.

Of that, $10 million will go to an economic development fund for grants that will be available to residents, businesses, nonprofits and institutions. The other $10 million will go toward a fund for sustainable development and clean energy, managed by the city.

The money would be paid in increments up until the completion of the second phase at Greenfield Road.

Lancaster County Community Foundation will manage the economic development funds. Grant recipients will be chosen by a committee with appointees from the city, the data center, the community foundation, and EDC Lancaster County, the county's lead economic development agency. Ezra Rothman, EDC Lancaster County's president, said grant recipients could include workforce development programs, tech startups, and local businesses looking to add new technology.

The sustainability fund will be used to carry out goals in the city's climate action plan and 2023 comprehensive plan, according to Chris Delfs, the city's economic development and community planning director. Possible uses include solar projects in the city, or energy efficiency upgrades for Lancaster city homeowners.

Environmental impact

The centers must get their electricity from clean energy sources for their first 10 years in operation. If they fail to do so, the owners will have to pay additional funds into the sustainable development and clean energy fund – on top of the grant money. The payment would be $2.5 million if less than 100% of the electricity comes from clean energy sources,

and $5 million if they fall below than 80%. If the centers cannot obtain at least 60% clean energy, they would not be allowed to operate, Sorace said.

Clean energy sources include nuclear, solar, wind hydro, ocean and geothermal.

The noise from the project cannot be greater than what exists now for any residential and parks / open space properties that share a property line. Generators can only be tested during the day and are required to have catalytic converters. The generators and electrical substations must be fenced or walled off to limit noise. Developers are required to add a 50-foot strip of grass and trees at each property line – 100 feet where it borders a park or residence.

Closed loop, magnetic levitation chiller systems are required for cooling. Each campus will use no more than 20,000 gallons of municipal water per day.

Operations

The developers will create a local hiring plan setting benchmarks for the number of local residents, minorities and women employed at the facilities. Each campus is expected to employ 150 people.

The developers will set up a website to provide the public with construction timelines, public meetings and information on construction and operations.

The owners will be required to train first responders on how to specifically deal with the facility. If there are emergencies that require an emergency response costing more than $25,000, the owners will pay the difference.

Plans to address noise, thermal heat, emergency management, e-waste and local hiring are due for the Greenfield site within 60 days of the agreement being approved, and for the Harrisburg Pike site within 60 days of the CoreWeave signing a lease with Chirisa for the facility.



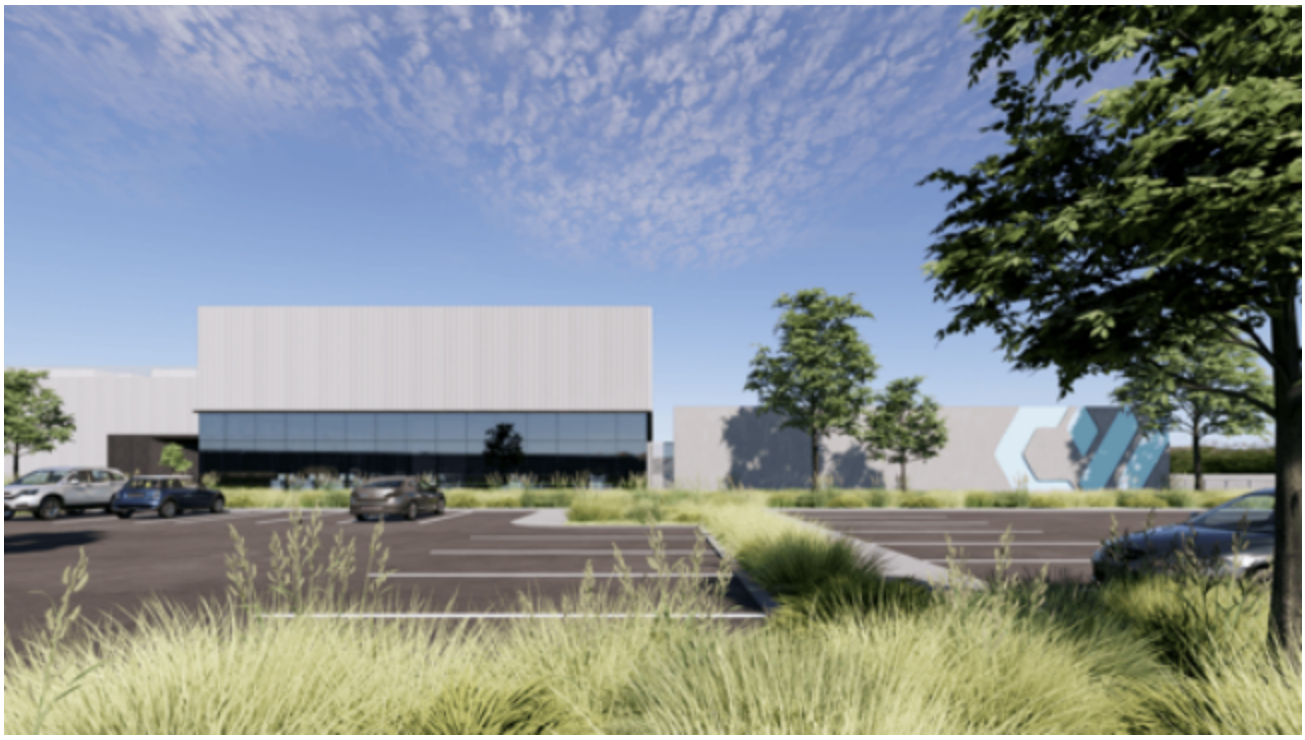
Local News
Developers face residents at data center open house in Lancaster city



Local News
Here's a look inside the Lancaster data center developer's Virginia facility [video]



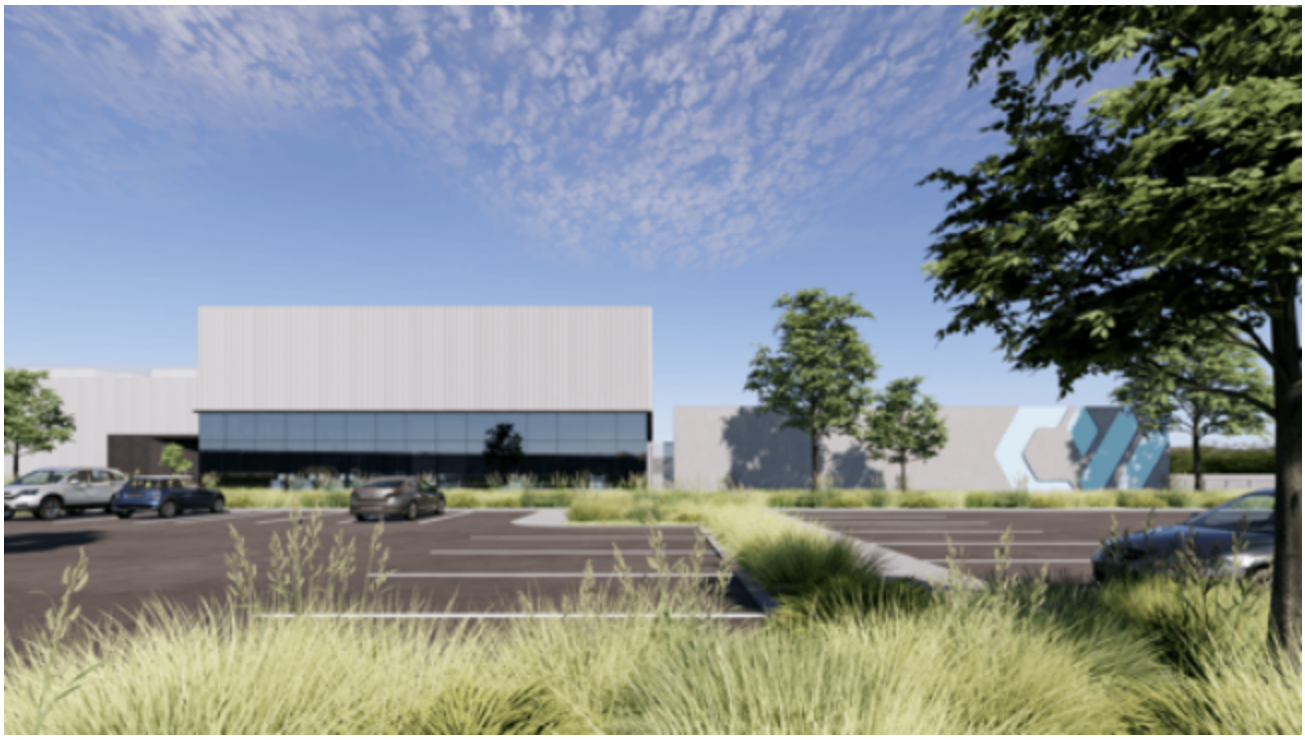
Local News
Lancaster city data center's second phase expected to cost up to $2.5B



Local News
Full coverage of data centers in Lancaster County [roundup]
Nov 11, 2025



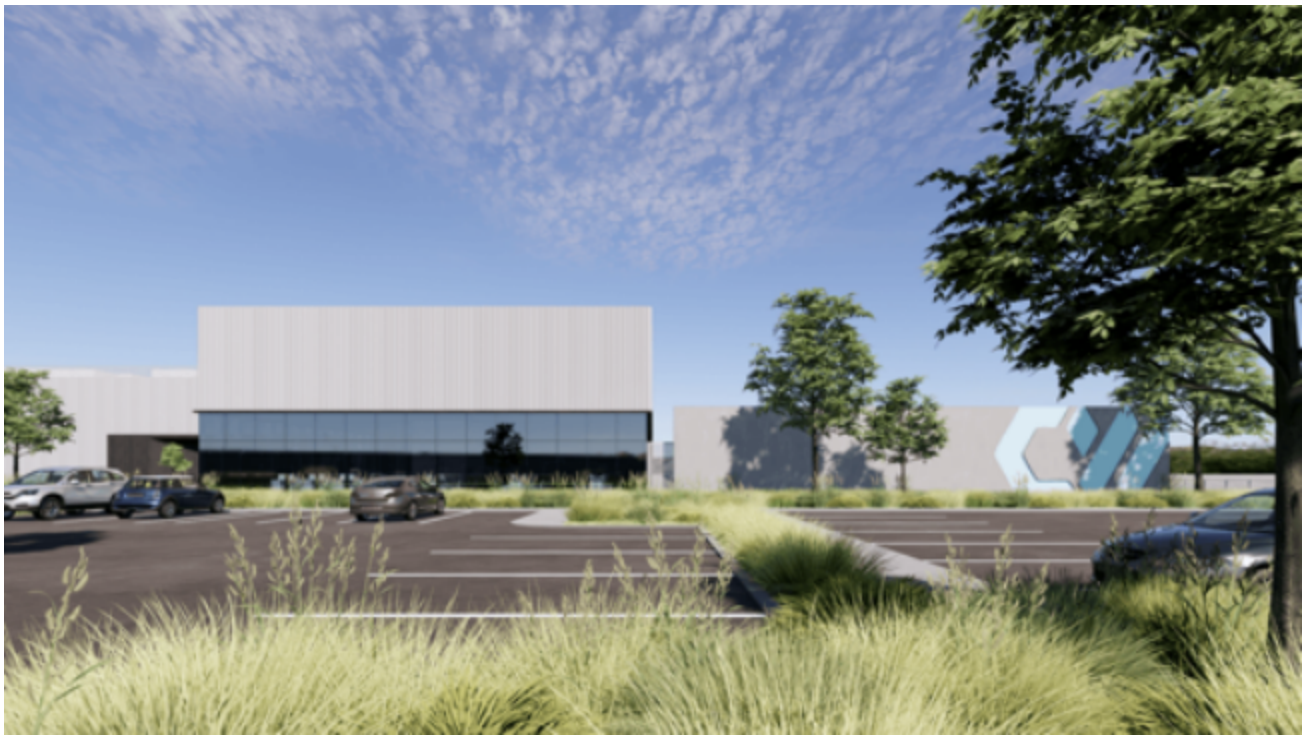
Proposed data center rules and pact won't reach Lancaster city council this week



Lancaster city data center developer hosting open house Wednesday



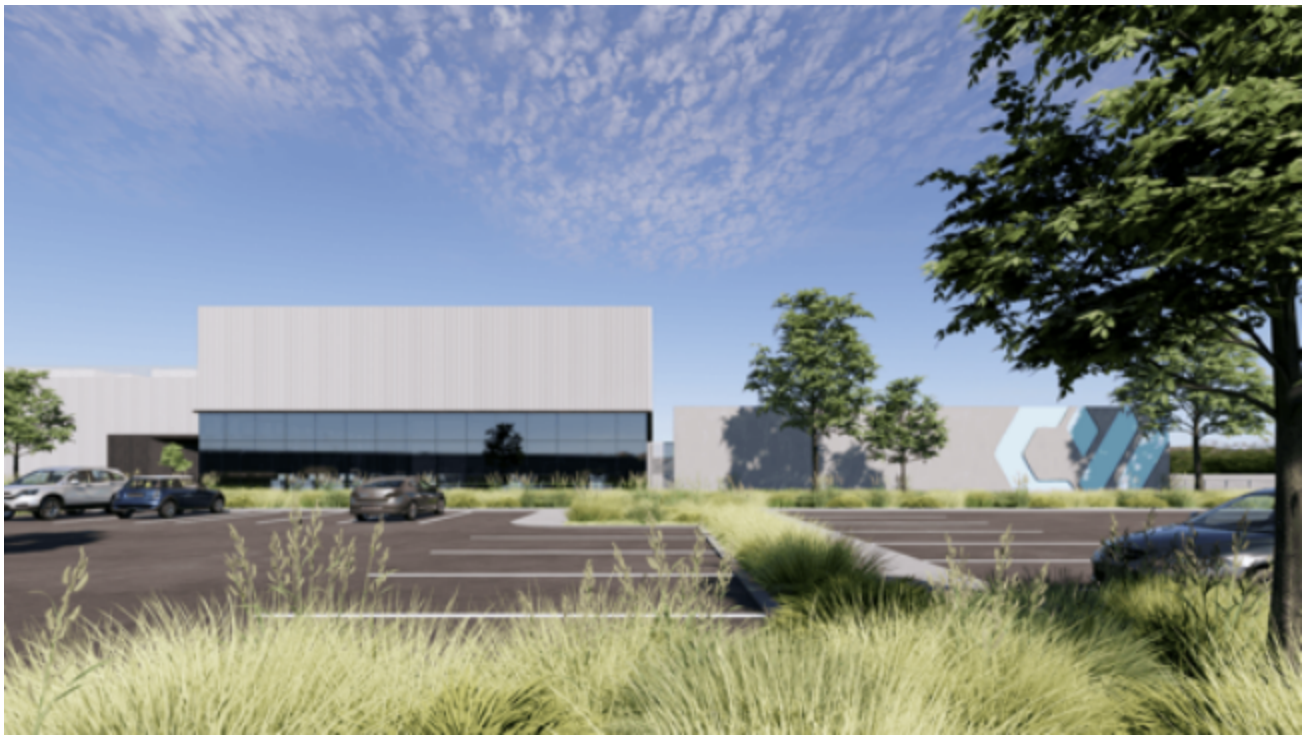
Lancaster city departments walk City Council through their budgets



Here are the new rules proposed for data centers in Lancaster city



Lancaster City Council to consider new data center rules



Plans submitted for Lancaster city data center's second phase



Lancaster city planners cancel data center hearing after mayor, zoning officer decline invite



Lancaster city data centers' water allotment to be 80% less than former printing plants



Lancaster mayor says taxes will not go up next year thanks to the home rule charter



Judge's order cancels Lancaster city data center zoning hearing



Data center developer asks judge to block Lancaster city zoning appeal

Learn more about your privacy options

[

From: Kirshner, Benjamin [redacted]
Sent: Thur 11/20/2025 9:08:03 PM (UTC-05:00)
To: Miller, Kevin (McCormick) [redacted]
Cc: Siger, Rick [redacted]
Subject: Re: [External] FW: 2 data center stories for your awareness

Thanks...appreciate it..

Ben Kirshner | Chief Transformation Officer
Office of the Governor | Office of Transformation and Opportunity
Cell: [redacted]
www.governor.pa.gov

From: Miller, Kevin (McCormick) <[redacted]
Sent: Thursday, November 20, 2025 9:07:00 PM
To: Kirshner, Benjamin <[redacted]
Cc: Siger, Rick <[redacted]
Subject: RE: [External] FW: 2 data center stories for your awareness

Yes of course. That's my miss.

Rick - Good evening. Sending this to you in case you haven't see this. Whenever something hits my desk that's material, I'll send to the two of you.

Thanks Kevin

-----Original Message-----
From: Kirshner, Benjamin <[redacted]
Sent: Thursday, November 20, 2025 9:03 PM
To: Miller, Kevin (McCormick) <[redacted]
Subject: Re: [External] FW: 2 data center stories for your awareness

Thanks so much. Can I send this to my DCED friends?

Ben Kirshner | Chief Transformation Officer

Office of the Governor | Office of Transformation and Opportunity

Cell: [redacted]

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From: Miller, Kevin (McCormick) <[redacted]
Sent: Thursday, November 20, 2025 9:01:47 PM
To: Kirshner, Benjamin <[redacted]
Subject: [External] FW: 2 data center stories for your awareness

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FYI - K

From: Gerace, Nate (McCormick) <[redacted]
Sent: Thursday, November 20, 2025 4:29 PM
To: Miller, Kevin (McCormick) <[redacted]
Subject: 2 data center stories for your awareness

Kevin,

These are two stories from this week about data centers that you may or may not find interesting.

Best,

Developer continues push for data center | 28/22 News<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.2822news.com%2Fnews%2Flocal-news%2Fdeveloper-continues-push-for-data-center-appeals-denied-zoning-application%2F&data=05%7C02%7Cbkirshner%40pa.gov%7Cd6947fe3ffc0402c3fea08de28a2a948%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638992876271464750%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Bdu526y6lJi9loPT02nhEWuFOt1Kewt%2ByHWaZxbPmTg%3D&reserved=0>

November 18

A prospective developer continues their push to build a new data center in Lackawanna County. Breaker Street Associates LLC met with Jessup's zoning hearing board on Tuesday to appeal a previously denied zoning application involving a proposed data center. The original application was denied in June after the borough's zoning officer determined the substation for the center could not be placed in a residential zone. The developer is now arguing that the substation should be allowed as an accessory use to the center. They also say that since the substation will be operated by PPL, it should be classified as a public utility, but admit it will not provide any direct benefit to the public. "While the switchyard and substation is not a direct benefit to the community, the data center will be. It allows for economic growth with taxes and jobs, and then infrastructure improvements that may be required as this development goes through approvals," Rettew Associates Project Manager Kim Fasnacht stated. Jessup's zoning board did not make any decisions at Tuesday night's appeal. No timeline was given as to when a decision might be reached.

Dickson City to regulate data centers through zoning<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thetimes-tribune.com%2F2025%2F11%2F18%2Fdickson-city-to-regulate-data-centers-through-zoning%2F&data=05%7C02%7Cbkirshner%40pa.gov%7Cd6947fe3ffc0402c3fea08de28a2a948%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638992876271480010%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=XK6f%2F3peEy46U3mRQF9l%2FoVytXA5JrBcgtiGeJi%2BF40%3D&reserved=0>

November 18, Times-Tribune

Dickson City is the latest Midvalley community working to regulate data centers. The borough will hold a public hearing Dec. 9 at 5:30 p.m. in the Borough Building, 901 Enterprise St., to solicit input on a proposed data center ordinance, according to a public notice published in The Sunday Times. The ordinance would make data centers special exceptions in Dickson City's light manufacturing districts, requiring developers to testify at a public hearing in front of the Dickson City Zoning Hearing Board while adhering to criteria established in the legislation, according to a draft of the ordinance. Dickson City's light manufacturing zoning encompasses Enterprise Street near Eagle Lane and undeveloped land southeast of Railroad Street. In the past year, the Midvalley has become a hotspot for data center proposals, not just in Lackawanna County, but across the state. Out of the nine data center proposals in Lackawanna County - one of which was withdrawn - eight were in the Midvalley. There are five proposed data center campuses in Archbald and two in Jessup. A developer also sought zoning relief to build a data center campus in Blakely but subsequently withdrew the proposal amid significant

community opposition. The only non-Midvalley proposal is a large campus planned for Clifton and Covington townships along Interstate 380. By scheduling a public hearing for its data center ordinance, Dickson City joins its Midvalley neighbors in Archbald, Blakely, Jessup and Olyphant in trying to regulate the rapidly expanding industry. Jessup was the first community to adopt a data center zoning ordinance, on Aug. 19, followed by adopting a reamended zoning ordinance with adjusted boundary lines Nov. 5. Archbald considered a data center zoning ordinance Oct. 3, but council did not vote on the legislation after a motion to vote on the ordinance died without a second; Archbald will reconsider that zoning ordinance during a special meeting Nov. 24 at 5 p.m. at the Borough Building, 400 Church St.

Blakely Borough Council unanimously voted Monday to apply 30-plus restrictions on data centers while limiting them to land on the outskirts of the town. Olyphant is also working on data center zoning. Dickson City's proposed ordinance handles data centers differently from other Midvalley communities. While the other towns designate data centers as conditional uses, Dickson City instead classifies them as special exceptions. Conditional uses and special exceptions are comparable types of zoning designations that allow municipalities to establish criteria that developers must follow to receive approval, but the governing bodies overseeing them differ. Borough council considers conditional use requests, while the zoning hearing board considers special exceptions. The draft legislation in Dickson City defines data centers as "a facility where digital data is stored and processed for access from the internet or other digital information pathways," and it establishes criteria they must meet as special exceptions. Those include: data centers must be sited with access to high-capacity electric substations to ensure reliable power; they must be set back at least 200 feet from residences or other noise-sensitive uses; they must be built on a minimum of 5 acres to ensure sufficient land area; they can be up to four stories tall; when using water cooling, they must have access to municipal sewer systems, on-site water treatment facilities or adequate drainage for wastewater, with preference given to sites with access to nonpotable water sources; generators and other power supply equipment must be fully enclosed to provide screening and reduce noise levels unless the zoning officer determines it isn't feasible; data centers must provide evidence of coordination of fire protection with the local fire department while meeting all reasonable requests for training, equipment and information, as well as preparing a master firefighting plan; and they must provide a decommissioning plan for any energy supply systems, among other criteria.

The Dickson City Planning Commission worked on the ordinance for months, although the borough has not received any official submissions or even sketch plans for data centers, borough Manager Cesare Forconi said. "The planning commission realized that these things weren't specifically addressed in our current zoning ordinance, so they realized that we needed to put in the protections for the municipality and for the residents," he said. Dickson City adopted its current zoning ordinance in April 2012 and last amended it in August 2018, he said. By allowing data centers as special exceptions in its light manufacturing zones, the borough will provide enough space to accommodate the use, but with the town having a footprint of only about 4 miles, they aren't an industrial community with large industrial parks and warehouses, Forconi said. "We don't have that much open land," Forconi said. While there is land on Bell Mountain, Forconi said it's zoned for residential and open space uses. He also noted the steep topography. Jim Marzolino, the president of Kriger Construction who is involved with two Archbald data center projects and the withdrawn Blakely project, is also involved with a development on Bell Mountain that includes plans to build a Wawa. Council has not decided if it will vote immediately following the conclusion of the Dec. 9 hearing, or at a later date, Forconi said.

Exhibit 7B

Nathan Gerace

Northeast Regional Director

U.S. Senator David H. McCormick

[redacted] (cell)

[redacted] mailto:[redacted]

Keep up with Senator McCormick with the links below!

X-
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[cid:image001.jpg@01DC5A3A.C68D3C20]

From: Siger, Rick[redacted]
Sent: Fri 11/21/2025 8:44:43 AM (UTC-05:00)
To: Miller, Kevin (McCormick)[redacted] Kirshner, Benjamin[redacted]
Subject: Re: [External] FW: 2 data center stories for your awareness

Thanks Kevin – much appreciated.

We should probably talk [redacted] soon as well – lots of good progress there.

Best.
Rick

From: Miller, Kevin (McCormick) <[redacted]
Date: Thursday, November 20, 2025 at 9:07 PM
To: Kirshner, Benjamin <[redacted]
Cc: Siger, Rick <[redacted]
Subject: RE: [External] FW: 2 data center stories for your awareness

Yes of course. That's my miss.

Rick - Good evening. Sending this to you in case you haven't see this. Whenever something hits my desk that's material, I'll send to the two of you.

Thanks Kevin

-----Original Message-----
From: Kirshner, Benjamin <[redacted]
Sent: Thursday, November 20, 2025 9:03 PM
To: Miller, Kevin (McCormick) <[redacted]
Subject: Re: [External] FW: 2 data center stories for your awareness

Thanks so much. Can I send this to my DCED friends?

Ben Kirshner | Chief Transformation Officer

Office of the Governor | Office of Transformation and Opportunity

Cell: [redacted]

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ov%7Cd6947fe3ffc0402c3fea08de28a2a948%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638992876271934692%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Bdg8Xda%2FQFsX9ZHfPrudg3%2BvbV%2FCfWkP302UEJZVNQg%3D&reserved=0>

From: Miller, Kevin (McCormick) <[redacted]
Sent: Thursday, November 20, 2025 9:01:47 PM
To: Kirshner, Benjamin <[redacted]
Subject: [External] FW: 2 data center stories for your awareness

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FYI - K

From: Gerace, Nate (McCormick) <[redacted]
Sent: Thursday, November 20, 2025 4:29 PM
To: Miller, Kevin (McCormick) <[redacted]
Subject: 2 data center stories for your awareness

Kevin,

These are two stories from this week about data centers that you may or may not find interesting.

Best,

Exhibit 7B

Developer continues push for data center | 28/22 News<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.2822news.com%2Fnews%2Flocal-news%2Fdeveloper-continues-push-for-data-center-appeals-denied-zoning-application%2F&data=05%7C02%7Cfsiger%40pa.gov%7Cd6947fe3ffc0402c3fea08de28a2a948%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638992876271963574%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Q%2Fmgh%2FTPmObugFqrsSxesnA5f4nfOhOxrDpx2FWCWI%3D&reserved=0>

November 18

A prospective developer continues their push to build a new data center in Lackawanna County. Breaker Street Associates LLC met with Jessup's zoning hearing board on Tuesday to appeal a previously denied zoning application involving a proposed data center. The original application was denied in June after the borough's zoning officer determined the substation for the center could not be placed in a residential zone. The developer is now arguing that the substation should be allowed as an accessory use to the center. They also say that since the substation will be operated by PPL, it should be classified as a public utility, but admit it will not provide any direct benefit to the public. "While the switchyard and substation is not a direct benefit to the community, the data center will be. It allows for economic growth with taxes and jobs, and then infrastructure improvements that may be required as this development goes through approvals," Rettew Associates Project Manager Kim Fasnacht stated. Jessup's zoning board did not make any decisions at Tuesday night's appeal. No timeline was given as to when a decision might be reached.

Dickson City to regulate data centers through zoning<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thetimes-tribune.com%2F2025%2F11%2F18%2Fdickson-city-to-regulate-data-centers-through-zoning%2F&data=05%7C02%7Cfsiger%40pa.gov%7Cd6947fe3ffc0402c3fea08de28a2a948%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C0%7C638992876271978076%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=1wiTb%2B76m6gnAxMBKPfVOj1IYDgYsv05F9glEN9BXXw%3D&reserved=0>

November 18, Times-Tribune

Dickson City is the latest Midvalley community working to regulate data centers. The borough will hold a public hearing Dec. 9 at 5:30 p.m. in the Borough Building, 901 Enterprise St., to solicit input on a proposed data center ordinance, according to a public notice published in The Sunday Times. The ordinance would make data centers special exceptions in Dickson City's light manufacturing districts, requiring developers to testify at a public hearing in front of the Dickson City Zoning Hearing Board while adhering to criteria established in the legislation, according to a draft of the ordinance. Dickson City's light manufacturing zoning encompasses

Enterprise Street near Eagle Lane and undeveloped land southeast of Railroad Street. In the past year, the Midvalley has become a hotspot for data center proposals, not just in Lackawanna County, but across the state. Out of the nine data center proposals in Lackawanna County - one of which was withdrawn - eight were in the Midvalley. There are five proposed data center campuses in Archbald and two in Jessup. A developer also sought zoning relief to build a data center campus in Blakely but subsequently withdrew the proposal amid significant community opposition. The only non-Midvalley proposal is a large campus planned for Clifton and Covington townships along Interstate 380. By scheduling a public hearing for its data center ordinance, Dickson City joins its Midvalley neighbors in Archbald, Blakely, Jessup and Olyphant in trying to regulate the rapidly expanding industry. Jessup was the first community to adopt a data center zoning ordinance, on Aug. 19, followed by adopting a reamended zoning ordinance with adjusted boundary lines Nov. 5. Archbald considered a data center zoning ordinance Oct. 3, but council did not vote on the legislation after a motion to vote on the ordinance died without a second; Archbald will reconsider that zoning ordinance during a special meeting Nov. 24 at 5 p.m. at the Borough Building, 400 Church St.

Blakely Borough Council unanimously voted Monday to apply 30-plus restrictions on data centers while limiting them to land on the outskirts of the town. Olyphant is also working on data center zoning. Dickson City's proposed ordinance handles data centers differently from other Midvalley communities. While the other towns designate data centers as conditional uses, Dickson City instead classifies them as special exceptions. Conditional uses and special exceptions are comparable types of zoning designations that allow municipalities to establish criteria that developers must follow to receive approval, but the governing bodies overseeing them differ. Borough council considers conditional use requests, while the zoning hearing board considers special exceptions. The draft legislation in Dickson City defines data centers as "a facility where digital data is stored and processed for access from the internet or other digital information pathways," and it establishes criteria they must meet as special exceptions. Those include: data centers must be sited with access to high-capacity electric substations to ensure reliable power; they must be set back at least 200 feet from residences or other noise-sensitive uses; they must be built on a minimum of 5 acres to ensure sufficient land area; they can be up to four stories tall; when using water cooling, they must have access to municipal sewer systems, on-site water treatment facilities or adequate drainage for wastewater, with preference given to sites with access to nonpotable water sources; generators and other power supply equipment must be fully enclosed to provide screening and reduce noise levels unless the zoning officer determines it isn't feasible; data centers must provide evidence of coordination of fire protection with the local fire department while meeting all reasonable requests for training, equipment and information, as well as preparing a master firefighting plan; and they must provide a decommissioning plan for any energy supply systems, among other criteria.

The Dickson City Planning Commission worked on the ordinance for months, although the borough has not received any official submissions or even sketch plans for data centers, borough Manager Cesare Forconi said. "The planning commission realized that these things weren't specifically addressed in our current zoning ordinance, so they realized that we needed to put in the protections for the municipality and for the residents," he said. Dickson City adopted its current zoning ordinance in April 2012 and last amended it in August 2018, he said. By allowing data centers as special exceptions in its light manufacturing zones, the

borough will provide enough space to accommodate the use, but with the town having a footprint of only about 4 miles, they aren't an industrial community with large industrial parks and warehouses, Forconi said. "We don't have that much open land," Forconi said. While there is land on Bell Mountain, Forconi said it's zoned for residential and open space uses. He also noted the steep topography. Jim Marzolino, the president of Kriger Construction who is involved with two Archbald data center projects and the withdrawn Blakely project, is also involved with a development on Bell Mountain that includes plans to build a Wawa. Council has not decided if it will vote immediately following the conclusion of the Dec. 9 hearing, or at a later date, Forconi said.

Nathan Gerace

Northeast Regional Director

U.S. Senator David H. McCormick

[redacted] (cell)

[redacted] mailto:[redacted]

Keep up with Senator McCormick with the links below!

X-
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Exhibit 7B

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[cid:image001.jpg@01DC5A3A.C68D3C20]

Exhibit 7B

From: Morgan Sipple [redacted]

Sent: Tue 11/25/2025 11:40:12 AM (UTC-05:00)

To: Finkel, Jacob [redacted]

Cc: Josh Levi [redacted] Dan Diorio [redacted] Aaron Tinjum [redacted] Khara Boender [redacted]

Subject: [External] Connect with DCC

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Hi Jacob,

Thanks for your engagement with DCC/Pam Quinlan in the PJM CIFP process—well done last week!

I want to connect you with my colleagues Dan Diorio and Khara Boender (cc'd) who lead DCC's state policy efforts. Do you have time to chat with us over Teams next week?

Happy Thanksgiving,

Morgan A. Sipple
Senior Energy Policy Manager
Data Center Coalition
[redacted]
https://www.datacentercoalition.org

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Exhibit 7B

From: Wade, David[redacted]
Attendees: [redacted]
Location: Microsoft Teams Meeting
Subject: OTO<>DCC
Importance: Normal
Start Time: Wed 12/3/2025 12:00:00 PM (UTC-05:00)
End Time: Wed 12/3/2025 12:30:00 PM (UTC-05:00)
Required Attendees: [redacted]

Microsoft Teams Need help?

Join the meeting now

Meeting ID: [redacted]
Passcode: [redacted]

Dial in by phone

[redacted] United States, Philadelphia
Find a local number
Phone conference ID: [redacted]
For organizers: Meeting options | Reset dial-in PIN
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Privacy and security

Exhibit 7B

From:	Dan Diorio[redacted]
Location:	Microsoft Teams Meeting
Subject:	Accepted: OTO<>DCC
Importance:	Normal
Start Time:	Wed 12/3/2025 12:00:00 PM (UTC-05:00)
End Time:	Wed 12/3/2025 12:30:00 PM (UTC-05:00)
Required Attendees:	Wade, David

From: Kirshner, Benjamin [redacted]
Sent: Fri 3/6/2026 2:35:48 PM (UTC-05:00)
To: Robinson, Samuel [redacted] Wade, David [redacted] Siger, Ricki [redacted] Bharill, Shivum [redacted] Finkel, Jacob [redacted]
Subject: Fast-tracking compliant data centers

FYI

Ben Kirshner | Chief Transformation Officer

Office of the Governor | Office of Transformation and Opportunity

Cell: [redacted]

www.governor.pa.gov

Book a Teams Meeting Here

From: J Brian Oneill <[redacted]
Date: Friday, March 6, 2026 at 2:14 PM
To: Kirshner, Benjamin <[redacted]
Subject: [External] Fast-tracking compliant data centers

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Ben,
Amazon has just informed us in writing, and I have sent you the e-mail, that they will not be doing any projects in Pennsylvania until they get certainty that the projects they have invested in can move forward. In conversations, they have pointed out to us that they have been appealed in **EVERY** project at **EVERY** turn. We are complying 100% with all of the governor's objectives, including brownfield, existing reuse, behind the meter power, closed-loop systems, etc. We want to make sure we are not going to get appealed frivolously by people that just want to slow us down for sport as they are currently doing to Amazon. Please include this in your policy and legislation.

1. Data centers should be required to build behind the meter power and should be protected from frivolous appeals.
    1. To ensure the construction of behind the meter power, those who wish to appeal EPA, DEP, or zoning applications for data center power should have to post a bond equal to two times the damages they would cause the developer/user.

        i. Example: If a $2 billion development is postponed due to an appeal, they should have to post a bond for $4 billion.
2. Zoned sites should have the right to build data centers so long as they comply with the zoning requirements.
    1. In order to ensure quick construction for users who need data center space now, anyone who wishes to appeal a zoned site should have to post a bond equivalent to two times the damages that are causing the developer, i.e., if a $2 billion development is being held up, they should have to post a bond for $4 billion.

Ben. Our phase one project generates $44 million in taxes versus $400,000 currently being paid by buildings which are empty and are being down valued to reduce those taxes. See the grid below. These taxes will pay over $30 million to the school district which needs to retool to prepare our children for AI, an expense that people are greatly underestimating, and $10s of millions of dollars to the county and municipality.

Of the Proposed MLP Data Center in Upper Merion Township and West Conshohocken Borough — February 9, 2026

	Upper Merion Twp.	West Conshohocken Bor.	Upper Merion School Dist.	Montgomery County	Total
Square Feet of Development	3,796,941	867,362	4,664,303	4,664,303	4,664,303
Assessed Value per SF	$300	$300	$300	$300	
Total Assessed Value	$1,139,082,300	$260,208,600	$1,399,290,900	$1,399,290,900	$1,399,290,900
Current Real Estate Tax Millage	5.619	1.180	24.010	5.642	36.451
Annual Real Estate Tax Revenue	**$6,400,503**	**$307,046**	**$33,596,975**	**$7,894,799**	**$48,199,323**

Our project is 20X the value of the Comcast Tower:

- Our 1 GW Data Center costs $35.16 Billion.
- The Comcast Tower total project cost was: $1.5 Billion
- The Comcast Tower generated 20,000 construction jobs.
- Comcast Tower created 2,800 permanent jobs
- The construction phase alone was projected to generate $2.75 Billion in economic activity within the state of PA

Sincerely,
Brian

Exhibit 7B

Exhibit 7B

From: Robinson, Samuel [redacted]

Sent: Wed 3/18/2026 5:21:17 PM (UTC-04:00)

To: Aaron Tinjum [redacted] Morgan Johnson [redacted] Dan Diorio [redacted]

Cc: Spishock, Sarah [redacted]

Subject: GRID Principle Review Draft

Good afternoon DCC team—

Thank you to everyone who provided helpful input on the Governor's Responsible Infrastructure Development (GRID) Principles since the program was announced in the Budget Address. In a folder you will receive momentarily, you will find a Feedback Draft of the principles, laying out the process of obtaining and maintaining GRID certification. We are looking to finalize and make the Principles public shortly, but first we would very much appreciate feedback on this draft.

Could you please provide any comments you have in a markup to the draft, and put it back in the folder that will be shared with you by **close of business Wednesday, March 25th.** From there, we will review all feedback, make revisions or reach out to discuss as necessary, and then finalize the program guidance. Kindly don't share beyond your internal team. Much appreciated, and as always, we're more than happy to discuss any questions you have as you review.

Thanks again,

Sam

Sam Robinson | Deputy Chief of Staff
Office of Governor Josh Shapiro
238 Main Capitol, Harrisburg, PA 17120
Cell: (717) [redacted]

Exhibit 7B

From: Robinson, Samuel [redacted]
Sent: Wed 3/18/2026 5:26:49 PM (UTC-04:00)
To: [redacted]
Subject: Robinson, Samuel shared the folder "DCC GRID Draft" with you



Robinson, Samuel shared a folder with you

Here's the folder that Robinson, Samuel shared with you.



DCC GRID Draft

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Exhibit 7B

From: Robinson, Samuel [redacted]
Sent: Wed 3/18/2026 5:26:49 PM (UTC-04:00)
To: [redacted]
Subject: Robinson, Samuel shared the folder "DCC GRID Draft" with you



Robinson, Samuel shared a folder with you

Here's the folder that Robinson, Samuel shared with you.



DCC GRID Draft

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From: Robinson, Samuel [redacted]
Sent: Wed 3/18/2026 5:26:50 PM (UTC-04:00)
To: [redacted]
Subject: Robinson, Samuel shared the folder "DCC GRID Draft" with you



Robinson, Samuel shared a folder with you

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DCC GRID Draft

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From: Robinson, Samuel [redacted]
Sent: Wed 3/18/2026 10:07:09 PM (UTC-04:00)
To: Ford, Becky [redacted] Madrid, Merle [redacted]
Cc: Spishock, Sarah [redacted]
Subject: Re: [External] Re: Updates from PA

Sounds good, thank you!

From: Ford, Becky <[redacted]
Sent: Wednesday, March 18, 2026 7:11 PM
To: Robinson, Samuel <[redacted] Madrid, Merle <[redacted]
Cc: Spishock, Sarah <[redacted]
Subject: [External] Re: Updates from PA

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Thanks, Sam. We will review and look forward to providing feedback.

Kind regards, Becky.

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From: Robinson, Samuel <[redacted]
Sent: Wednesday, March 18, 2026 5:21:10 PM
To: Madrid, Merle <[redacted] Ford, Becky <[redacted]
Cc: Spishock, Sarah <[redacted]
Subject: RE: [EXTERNAL] Updates from PA

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Good afternoon AWS team—

Thank you to everyone who provided helpful input on the Governor's Responsible Infrastructure Development (GRID) Principles since the program was announced in the Budget Address. In a folder you will receive momentarily, you will find a Feedback Draft of the principles, laying out the process of obtaining and maintaining GRID certification. We are looking to finalize and make the Principles public shortly, but first we would very much appreciate feedback on this draft.

Could you please provide any comments you have in a markup to the draft, and put it back in the folder that will be shared with you by close of business Wednesday, March 25th. From there, we will review all feedback, make revisions or reach out to discuss as necessary, and then finalize the program guidance. Kindly don't share beyond your internal team. Much appreciated, and as always, we're more than happy to discuss any questions you have as you review.

Thanks again,

Sam

[signature_2270517134]<https://www.pa.gov/governor/newsroom/2025-press-releases/gov-shapiro-s--lightning-plan--moves-forward-two-key-components->
Sam Robinson| Deputy Chief of Staff
Office of Governor Josh Shapiro
238 Main Capitol, Harrisburg, PA 17120
Cell: (717) [redacted]

From: "Siger, Rick" <[redacted]
Date: Tuesday, February 3, 2026 at 8:51 AM
To: "Madrid, Merle" <[redacted] "Ford, Becky" <[redacted]
Cc: "Ruby, Kara" <[redacted] "Spishock, Sarah" <[redacted] "Robinson, Samuel" <[redacted] "Finkel, Jacob" <[redacted]
Subject: Updates from PA

Dear AWS Colleagues,

As you may know, today Governor Shapiro will deliver his Budget Address, which will feature significant discussion of energy and affordability issues that are before the Commonwealth. I wanted to reach out and share details about new "Data Center Principles" he will be announcing (that you spoke with our team about yesterday), as well as our desire to work with you both to flesh out and refine the Principles, but more importantly put them into practice. The Principles fall in four buckets: 1) maintaining energy affordability; 2) transparency and direct community engagement; 3) local workforce and economic development; and 4) protecting our environment.

Examples of the first Principle includes data centers bringing their own sources of energy. Transparency and community engagement includes things like sharing information with the host community that will allow it to make informed decisions about the facility, such as traffic information, and potential emissions. The local workforce and economic development Principle includes things like hiring and training local workers and entering into community benefit agreements. Finally, the environmental Principle includes commitments to water conservation and energy efficiency.

The Principles are intended to be voluntary, and the Governor is not proposing to ban or even discourage data centers or other large loads that don't agree to implement them from siting here. What he is proposing is to condition state support going forward—things like his vocal support, fast track permitting, and favorable tax treatment—on the degree to which proposed projects adhere to the Principles. We think that this creates an opportunity for social license, much like a LEED certified building; projects will have the opportunity to get a stamp of approval from the state (and additive state support) by following a set of common-sense best practices. Also like LEED, we anticipate different tiers of commitment, which correspond to differing levels of support from the state.

While the Governor is going to propose these Principles today, we very much want to engage with all of you to make them strong and workable and would like to set up meetings with the appropriate members of your team and ours over the next several weeks to discuss. I've asked Kara Ruby and Sarah Spishock, copied here to coordinate times that work for you. I look forward to those conversations, and to continuing to make Pennsylvania a leading location for investment and adoption of best practices in this critical industry.

On a personal note, our team has benefitted enormously from AWS' commitment to PA as we learn about this incredibly fast-moving industry. We particularly look forward to our continued work to grow your presence here, and want to emphasize that this new approach will not look back at projects or agreements already in place, like those we are working on together.

All the best,

Rick

[cid:image002.png@01DCB6FB.9D01A710]

Rick Siger | Secretary

PA Department of Community & Economic Development

Commonwealth Keystone Building

400 North Street, 4th Floor | Harrisburg, PA 17120-0225

P: [redacted] | E: [redacted] <mailto:[redacted]20> | dced.pa.gov<http://www.dced.pa.gov>

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