October 23, 2026

Via Electronic Mail Only

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 Subchapter G, for Approval to Build Approximately 1.1 Miles of New Parallel Double Circuit 230 kV Transmission Taps that are Needed to Connect the Existing Susquehanna-Harwood #1 & #2 Transmission Lines on the New Tomhicken 230 kV Switchyard that are Respectively Located in Luzerne County, Pennsylvania
Docket No. A-2025-3059443

Dear Secretary Homsher,

Enclosed for filing with the Pennsylvania Public Utility Commission is the Reply Brief 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
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570-436-3089

Enclosures

Matthew L. Homsher, Secretary

October 23, 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 have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Reply Brief of John Zola in Protest to the Application of PPL Electric Utilities Corporation ("PPL Electric"), upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 5.101 (relating to preliminary objections), in the manner and upon the persons listed below.

Dated this 23rd day of October 2026.

VIA E-MAIL

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October 23, 2026

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	:	

Reply Brief of John Zola

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I. Introduction

My name is John Zola. I am a property owner and resident of Sugarloaf Township as well as a PPL Ratepayer. There are many reasons why I decided to submit a protest to this Letter of Notification, or Phase 1, of this Project. These reasons include the need/necessity of the Project, the cost to PPL rate payers, the accuracy of the Project information, the health and safety concerns of the public, environmental impacts, lack of public notification, and acts in bad faith.

II. Background

1. On November 14, 2025, the Hazle Township Board of Supervisors (BOS) denied NP Hazleton Holdings 1, LLC's land development plan.
2. On December 12, 2025, NP Hazleton Holdings 1, LLC ("NorthPoint") filed a lawsuit appealing the land development plan denial for the proposed project site.
3. On December 19, 2025, PPL Electric filed a Letter of Notification of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Phase 1: Approval to Build Approximately 1.1 Miles of New Parallel Double Circuit 230 kV Transmission Taps that are Needed to Connect the Existing Susquehanna-Harwood #1 & #2 Transmission Lines on the New Tomhicken 230 kV Switchyard that are Respectively Located in Luzerne County, Pennsylvania (hereinafter, the "Letter of Notification"). As noted by the OCA in their Motion for Consolidation, page 3:

   According to PPL, it "will carry out the projects necessary to serve this Customer's load request in two separate phases. Phase 1, subject to this [LON], is needed to connect the Customer requesting transmission-level service." Phase 1 LON ¶ 23. Further: Phase 2 will be needed to address the Customer's future electrical needs and demands, as well as PPL Electric's system needs. Phase 2 will be submitted in a subsequent filing, which PPL Electric anticipates may necessitate a full siting application. PPL Electric notes that the phases are being submitted separately because only the first phase is required to meet the Customer's inservice request; Phase 2 will not be necessary until the Customer's load increases at a future date. Phase 1 LON ¶ 24.

4. On March 12, 2026, I, John Zola, pro se Protestant, filed a Protest to the Phase 1 LON.
5. On March 13, 2026, Erika Cook filed a Protest to the Phase 1 LON.
6. On March 18, 2026, ALJs Gannon and Coogan convened a Prehearing Conference regarding the Phase 1 LON.

7. On April 7, 2026, PPL submitted a transmission line siting application for Phase 2 requesting approval to (1) bifurcate and rebuild 4.4 miles of the existing Sunbury-Susquehanna #1 230 kV transmission line; (2) construct 0.9 miles of new transmission line tap for future 230 kV double-circuit operation; (3) raise approximately 0.5 miles of the Sunbury-Susquehanna 500 kV transmission line; and (4) construct 11.2 miles of new double-circuit 230 kV transmission line for future double-circuit 500 kV capacity, located in Black Creek, Hazle, Hollenback, Nescopeck, and Sugarloaf Townships in Luzerne County, Pennsylvania (Phase 2 Application). The Applicant's proposed project and routing are contingent upon local zoning, land use, and property rights.
8. On May 7, 2026, the OCA submitted a Protest and Public Statement to the Phase 2 Application and a Motion for Consolidation of the Phase 1 LON and Phase 2 Application proceedings.
9. On May 13, 2026 PPL Electric filed its Direct Testimony for Phase 1 Docket A-2025-3059443 with the PUC.
10. On May 19, 2026, Erika Cook, pro se Protestant, submitted a Motion to Deny the Applications/Zoning Exemption Petition Without Prejudice.
11. On May 26, 2026, Luzerne County court denied the land use appeal by NP Hazleton Holdings 1, LLC in Case # 202513744 remanding the matter to the Hazle Township Zoning Hearing Board for special exception or NP Hazleton Holdings 1, LLC was permitted to challenge the validity of the Hazle Township Zoning Ordinance.
12. On May 27, 2026, PPL submitted its Answer to the OCA's Motion for Consolidation of the Phase 1 LON and Phase 2 Application proceedings.
13. On June 8, 2026, the Hazle Township Board of Supervisors adopted Resolution 2026-16:

RESOLUTION #2026-16

HAZLE TOWNSHIP, LUZERNE COUNTY, PENNSYLVANIA

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

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

15. On June 10, 2026, NP Hazleton Holdings 1, LLC appealed the land use denial issued by Luzerne County to the Commonwealth Court of Pennsylvania.
16. On June 18, 2026, ALJs Coogan and Gannon issued an Order Denying the OCA's Motion for Consolidation.
17. On June 23, 2026, ALJs Coogan and Gannon issued an Order denying the Motion to Deny Applications/Petition Without Prejudice filed by Erika Cook.
18. On June 30, 2026, the Commission held two in-person Public Input Hearings (PIH) in Hazleton, PA.
19. On July 6, 2026, the OCA submitted a Motion to Leave to Submit Supplemental Direct Testimony in the Phase 1 proceeding, which was granted, in part through ALJs Coogan and Gannon's July 10, 2026 Order.
20. Only July 8, 2026, I, John Zola, pro se Protestant, submitted my Direct Testimony.
21. Only July 8, 2026, Erika Cook, pro se Protestant, submitted Direct Testimony.
22. On July 8, 2026, the OCA submitted its Direct Testimony consisting of OCA Statement 1, the Direct Testimony of Frank Felder, and OCA Statement 2, the Direct Testimony of Rao Konidena.
23. On August 4, 2026 Luzerne County Judge Lesa Gelb issued her Order and Opinion in Case # 202513744, Docket List Item # 104.
24. On August 6, 2026, PPL submitted the Motion of PPL Electric Utilities Corporation to Dismiss Objections and Compel Responses to Requests for Admission Propounded on the Office of Consumer Advocate – Set I, Nos. 10 through 13.
25. On August 7, 2026, the OCA submitted its Renewed Motion for Consolidation of the Phase 1 LON and Phase 2 Application proceedings.
26. On August 7, 2026, PPL submitted its Rebuttal Testimony consisting of:
    - PPL Electric Statement No. 1-R – Rebuttal Testimony of Joseph Lookup
        - PPL Electric Exhibit JBL-1R
    - PPL Electric Statement No. 2-R – Rebuttal Testimony of Kyle Swartzentruber
    - PL Electric Statement No. 3-R – Rebuttal Testimony of Peter Sparhawk
    - PPL Electric Statement No. 4-R – Rebuttal Testimony of Chad Huber
    - PPL Electric Statement No. 5-R – Rebuttal Testimony of John D. Taylor
        - PPL Electric Exhibits JDT-1R
    - PPL Electric Statement No. 6-R – Rebuttal Testimony of Bethany L. Johnson
        - PPL Electric Exhibits BLJ-1R through BLJ-3R

27. On August 12, 2026, Erika Cook, pro se Protestant, submitted a Renewed Motion to Deny the Application (LON) Without Prejudice or Stay the Application (LON) until the land-use conflict litigation is resolved in a manner that satisfies all Commission requirements.
28. On August 21, 2026, ALJs Coogan and Gannon issued an Order Denying the Motion of PPL Electric Utilities Corporation to Dismiss Objections and Compel Responses to Requests for Admission Propounded on the Office of Consumer Advocate – Set I, Nos. 10 through 13.
29. On September 4, 2026, OCA filed its Surrebuttal Testimony Statements 1SR: Surrebuttal Testimony of Frank A. Felder, Ph.D. and 2SR: Surrebuttal Testimony of Rao Konidena.
30. On September 4, 2026, I, John Zola, submitted my Surrebuttal Testimony.
31. On September 4, 2026, Erika Cook submitted her Surrebuttal Testimony.
32. On September 8, 2026, ALJs Coogan and Gannon issued an Order Denying the OCA's Renewed Motion for Consolidation.
33. On September 8, 2026, ALJs Coogan and Gannon issued an Order denying the Renewed Motion to Deny Application Without Prejudice or Stay the Application filed by Erika Cook.
34. On September 14, 2026, PPL filed Objections and Motion to Strike Portions of the Written Direct Testimony of the Office of Consumer Advocate.
35. On September 14, 2026, PPL submitted the Affidavits and Proofs of Publication indicating that the Evidentiary Hearing Notice for the above-referenced proceeding was published in the Wilkes Barre Times Leader on August 27, 2026 and September 2, 2026, and in the Hazleton Standard Speaker and Wilkes Barre Citizens' Voice on August 28, 2026 and September 4, 2026.
36. On September 14, 2026 PPL submitted Rejoinder Testimony consisting of:
    - PL Electric Statement No. 1-RJ – Rejoinder Testimony of Joseph Lookup
    - PPL Electric Statement No. 2-RJ – Rejoinder Testimony of Kyle Swartzentruber
    - PPL Electric Statement No. 5-RJ – Rejoinder Testimony of John D. Taylor
37. On September 17, 2026, Day 1 of the Evidentiary Hearing was held in Harrisburg, PA.
38. On September 18, 2026, Day 2 of the Evidentiary Hearing was held in Harrisburg, PA.
39. On September 18, 2026, OCA submitted the Motion of the Office of Consumer Advocate (OCA) to Amend or Withdraw Expert Witnesses' Admissions Pursuant to 52 Pa. Code Section 5.350(f) in this proceeding.
40. On September 22, 2026, ALJs Coogan and Gannon issued an Order Addressing Briefs, Denying PPL's Motion to Strike Portions of the Written Direct Testimony of the Office of Consumer

Advocate, and Denying OCA's Motion to Amend or Withdraw Expert Witnesses' Admissions Pursuant to 52 Pa. Code Section 5.350(f).

41. On October 23, 2026, I, John Zola, submit my Main Brief.
42. On October 8, 2026, Main Briefs were also submitted by Erika Cook, OCA and PPL Electric.
43. On October 23, 2026, I, John Zola, submit my Reply Brief.

III. Reply Argument

PPL CLAIM: The company claims that this project will serve more than one customer.[1]

Argument: In Mr. Zola's cross examination of Mr. Joseph Lookup he asked if he was aware that the customer was denied land use approval necessary to proceed with the project. Mr Lookup acknowledged that he was aware of that fact. Mr. Lookup was then asked, if there is no customer to serve, would PPL be effectively constructing a transmission line to nowhere that serves no purpose. Mr. Lookup responded yes. So if the Company's claim was factual that it would be serving more than one customer, then why did Mr. Lookup agree that without land use approval for "the customer " the company would be constructing a line to nowhere serving no purpose?

PPL CLAIM: Section 1501 of the Code obligates PPL Electric to furnish and maintain adequate, efficient, safe and reasonable service and facilities in its territory.[2]

Argument: PPL has not proven that there is sufficient energy generation to serve this project's immediate needs or future needs ,creating inadequate,inefficient ,unsafe and unreasonable service to its existing electric customers. A power generation shortfall would be catastrophic if this project is approved.

PPL Claim: There is undisputed need for the proposed HV Transmission Lines.[3]

Argument: Please see Mr. Zola's cross examination of Mr. Joseph Lookup where Mr. Lookup Admits that without land approval for " the customer " they would be constructing a line to nowhere serving no purpose. That testimony under oath proves that there is no undisputed need for the proposed HV Transmission Line in fact there would be no need.

[1] PPL Main Brief, p. 3 ¶ 12
[2] PPL Main Brief, p. 27
[3] PPL Main Brief, p. 26

PPL CLAIM: While Mr. Zola disputes whether the Project is needed due to ongoing litigation surrounding the customers land use approvals, this does not change the fact that " IF " the customer constructs its facilities , it has the requested service that PPL Electric is obligated to provide.[4]

Argument: The operative word is " IF " and at this point in time there is no way to determine if it will ever construct its facilities and if it doesn't it will unnecessarily cost rate payers millions of dollars for a project that wasn't needed.

PPL CLAIM: PPL Electric also demonstrated that the HV transmission lines will not create an unreasonable risk of danger to the health and safety of the public.[5]

Argument: PPL has not demonstrated that there is adequate power generation to provide the required energy to the project leading to line sag, overheating of wires and potential fire risk creating an unreasonable risk of danger to the health and safety of the public.

PPL CLAIM: Importantly ,however the applicant is not required to receive all necessary permits before the commission may approve the transmission line, or before construction or the proposed line begins.[6]

Argument: The customer is not simply trying to obtain a permit in fact they have been denied land use approval by the Township, have lost their appeal in Luzerne County Court and now wait to be heard in the Commonwealth Court. Approving this project would be a disservice to the rate payers.

IV. Conclusion

In conclusion, I do not believe that PPL has met the burden of proving that there is a need for this Project and that the need is paramount for the health, safety and welfare of the Public. Furthermore, I ask the commission to give very serious attention to the obvious lack of power generation to safely provide the electricity for this Project regardless of the land use approval status.

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 the need for the project and that the need is paramount for the health, safety and welfare of the Public as well as solid proof that there is adequate power generation existing at this point in time to supply the customers projected 2030 needs.

[4] PPL Main Brief, p. 21
[5] PPL Main Brief, p. 17
[6] PPL Main Brief, p. 13

Respectfully,



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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: October 23, 2026



John Zola, Pro Se Protestant