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 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
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570-233-8205

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 Erika Cook 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 Erika Cook

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I. Introduction

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

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

RESOLUTION #2026-16

HAZLE TOWNSHIP, LUZERNE COUNTY, PENNSYLVANIA

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

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

15. On June 10, 2026, NP Hazleton Holdings 1, LLC appealed the land use denial issued by Luzerne County to the Commonwealth Court of Pennsylvania.
16. On June 18, 2026, ALJs Coogan and Gannon issued an Order Denying the OCA's Motion for Consolidation.
17. On June 23, 2026, ALJs Coogan and Gannon issued an Order denying the Motion to Deny Applications/Petition Without Prejudice filed by Erika Cook.
18. On June 30, 2026, the Commission held two in-person Public Input Hearings (PIH) in Hazleton, PA.
19. On July 6, 2026, the OCA submitted a Motion to Leave to Submit Supplemental Direct Testimony in the Phase 1 proceeding, which was granted, in part through ALJs Coogan and Gannon's July 10, 2026 Order.
20. Only July 8, 2026, I, Erika Cook, pro se Protestant, submitted my Direct Testimony.
21. Only July 8, 2026, John Zola, 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, I, Erika Cook, pro se Protestant, submitted my Renewed Motion to Deny the Application (LON) Without Prejudice or Stay the Application (LON) until the land-use conflict litigation is resolved in a manner that satisfies all Commission requirements.
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, Erika Cook, submitted my Surrebuttal Testimony.
31. On September 4, 2026, John Zola submitted his 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 8, 2026, I, Erika Cook, submitted my Main Brief.
42. On October 8, 2026, Main Briefs were also submitted by John Zola, OCA and PPL Electric.
43. On October 23, 2026, I, Erika Cook, submit my Reply Brief.

III. Reply Argument

A. Assessment of Witness Credibility

PPL speaks about impeaching a witness's credibility[1]. PPL's own witness, Mr. Joseph Lookup, made multiple conflicting statements regarding the Project. Are Phase 1 and Phase 2 required for the only Customer or are they for the Customer and potential growth in the area[2]?

B. Burden of Proof

PPL Electric continues to state that they have proven the need for this line. Repeatedly, their only argument continues to be that they are obligated to serve when asked to provide service. But in adding new large load customers to their service, they are being discriminatory and jeopardizing their current customers and their service.

As stated previously, the Customer is no longer awaiting permit approval, they are actively litigating against a denial.[3] It is my understanding that the case law referenced by PPL is regarding a PJM project and for the stability of the regional grid.[4] That is not the case here. This LON Project is not a PJM project, it is for A Customer. PPL indicates they will only proceed with construction if a need persists.[5] Why did PPL submit the LON *after* the Customer was denied their land development plans? The Customer was denied on November 14, 2025 and PPL submitted the LON on December 19, 2025. They could have waited to submit the LON until land development approval was received, instead PPL chose to move forward with it anyway.

[1] PPL Main Brief, p. 8
[2] Cook Direct Testimony, p. 11-13
[3] Cook Main Brief, p. 11
[4] PPL Main Brief, p. 13, footnote 53
[5] PPL Main Brief, p. 16

C. Providing Reliable and Safe Power

PPL has not stated where the power is coming from to transmit through these transmission lines. As PPL states, they have a statutory obligation to provide safe and reliable service to its customers[6]. They have not provided any proof that they can actually provide safe or reliable service to its customers based upon the LON only. They can only do that with the incorporation of Phase 2. PPL intentionally submitted Phase 1 and Phase 2 separately. PPL has not secured any protections for itself or its existing customers within its ESA for this Customer in the case that Phase 2 does not materialize as projected. They have agreed to uninterruptible service with Customer 1 based upon assumption of approvals. By connecting Customer 1, they are failing to furnish and maintain adequate, efficient, safe, and reasonable services and facilities.[7]

D. Supplemental Project

PPL submitted this LON to PJM as a Supplemental Project. [8] According to PJM's website, Supplemental projects "are transmission expansions or enhancements that are not required for compliance with PJM criteria and are not state public policy projects according to the PJM Operating Agreement. These projects are used as inputs to RTEP models, but are not required for reliability, economic efficiency, or operation performance criteria, as determined by PJM". Since Phase 1 and Phase 2 were submitted as part of the same PJM Supplemental Project - s3528, they must not be required for reliability per PJM's definition.

PPL then continues on to state that the non-transmission line facilities are appropriately designed to anticipate future load needs in the area.[9] They also discuss that OCA challenges the design regarding the switchyard and argue that the facilities are not in question. The facilities are questioned because if this is a Supplemental Project, why would the design be needed for future load needs? This definitely bears weight on the issues pending before the ALJ's and the Commission. The information submitted to the Commission must be accurate for a prudent and judicial review.

Most importantly, PJM's evaluation states Project S3528 does no harm when evaluated as ONE PROJECT.[10] Phase 1 sections of the Supplemental Project are: S3528.1, S3528.4, S3528.6, S3528.9, S3528.11. Phase 2 sections are: S3528.2, S3528.3, S3528.5, S3528.7, S3528.8, S3528.10. Yet these have been presented as two separate applications in front of the Commission. PPL is advising that the Commission can only review Phase 1 here. It is not fair to make a blanket statement saying PJM approves when we are only supposed to be looking at Phase 1 for the LON. If the Commission is to only

[6] PPL Main Brief, p. 19
[7] PPL Main Brief, p. 27
[8] PPL Main Brief, p. 22
[9] PPL Main Brief, p. 25
[10] PPL Main Brief, p. 31

review Phase 1, then PJM should also have to evaluate only Phase 1 portions of Supplement Project S3528 and confirm that Phase 1 alone will not cause harm to the transmission system.

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. This Project is to serve A Customer and that Customer's development may not come to fruition. Moreover, PPL cannot safely provide the requested overall 965 MW load request from Customer within the scope of the LON and Phase 1 alone.

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,



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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: October 23, 2026



Erika Cook, Pro Se Protestant