

**Written Testimony to be Presented at the Public Input Hearing
of the Public Utility Commission
July 17, 2008**

Your Honor, I want to thank you listening to our concerns. And also to thank every party that have given time and resources to the intervention, including our representatives, the Springfield Township BOS, the individual landowners, and the many volunteers in our community.

As you may recall from my prior oral statements and written complaint, I oppose the PPL plan in its entirety, and also the way they've gone about it.

First, I think it's evident that families near the substation will suffer significant loss of property value¹ and diminished quality of life – unnecessarily.

At the Springfield Township hearings of July 14th we heard a litany of complaints against the PPL plan:

Striking to me was that the PJM group has not even validated the need for this project, according to the attorney for SEPTA, Mr. Hicks. And I thank Mr. Hicks for sharing this information with the public.

So it appears that we have yet another reason why residents should not be forced to devalue their personal properties and lives, or give approval to degrade special places in the Townships.

It's also my impression that PPL doesn't need permission to expand the transmission line or 7-acre substation once it's in, so I think everyone needs more time to absorb the information presented in these hearings, and the implications.

Also, Mr. Hicks said that the unused SEPTA route is doable – has been doable all along, which was not PPL's message at the Public meeting of February 2007 in Springfield Township. Your Honor, I must confide with you that it's becoming difficult for me to put credence in *any* statements of fact made by PPL in this matter.

Regarding substation siting criteria, please refer to Exhibit S1: a part of the United States Department of Agriculture Guidelines on the Design of Rural substations:

- The guidelines say, do the investigative studies before you buy the land, ... PPL did the opposite,
- The guidelines say, avoid floodplains, ...
- To build near roads that can support heavy traffic, ...

¹ Journal of Real Estate Research 7(3): 315-330, 1992.,
High Voltage Power Lines: Do They Affect Residential Property Value?

- The guidelines describe other factors, such as “*avoidance of wetlands and prime or unique farmlands where possible.*”

Seems like PPL has not read the government guidelines, or, if it did, has decided to ignore many of the recommendations.

If anyone is unsure that the Hickon Road site is flood prone, please examine the exhibit I labeled S2, which includes photographs of flooding relative to the PPL proposed 7-acre substation.

Exhibit S3 shows that more appropriate substation sites exist along the 309/SEPTA commercial corridor. And that each is near existing transmission lines.

And how much faith can we have that PPL will “*mitigate*” environmental or flooding risks as it claims? The testimonies of residents about how PPL manages ROWS does not inspire confidence.

We also heard moving testimony how PPL did not inform residents that condemnation of property cannot be done without PUC approval. We heard (to the effect): *Take the offer now, the better offer, or it will be condemned later.*

Striking to me is the integrity of Mr. Ernie Weaver, recalling his testimony that he refused the ROW deal by PPL, which he felt would have undermined the value of his neighbor’s property.

We also heard compelling testimony from environmental scientists who validated our concerns about flooding and other negative impacts to treasured ecosystems and natural places ... showing that this is not a manufactured environmental issue; that these are in fact exquisite places that deserve preservation. Places that provide valuable services, such as recharging ground water and supporting endangered plants and animals.

We heard also testimony from Hans Reimann describing how vegetation management encourages invasive plants to take root and spread in and beyond the ROW. That when an ecosystem is overrun by a few species of invasive plants, the creatures that evolved with the native plants disappear too. ROWs don’t belong in unique, pristine habitats, particularly when you have other choices.

Finally, many in our community are deeply concerned about the process; about allowing this application to be a model for land use decisions in future.

That is: a corporation decides on the need and the route without public discussion, buys land first, does the impact studies second, “informs” the public last, ... then cites it’s purpose is “for the Convenience or Welfare of the Public”² in it’s applications.

Will PPL also argue that it’ cannot change plans now because this too would be inconvenient to the public welfare?

This concludes my comments. Thank you very much for listening.

² PUC document, item P-2008-2038262, June 27, 2008: “*Petition of PPL Electric Utilities Corporation, for a finding that building to shelter control equipment at the Substation to be constructed in Springfield Township, Bucks County, Pennsylvania Necessary for the Convenience or Welfare of the Public.*”