

**Testimony before Public Input Hearing  
of the Public Utility Commission  
July 14, 2008**

Good evening your Honor and thank you for allowing me to Speak.

My name is Joseph Frank Franlin. My wife Judy and I live in Springfield Township at 3175 Lower Saucon Road, Hellertown PA 18055. We have no financial interest in the outcome of this decision.

Your Honor, I am a businessman with lengthy experience in the telecommunications industry. I co-founded a NYSE company that amongst other things is the North American Numbering Plan Administrator, the Pooling line number Administrator and the Administrator for Local Number Portability in the USA and Canada. Thus, I have some understanding of the regulatory process, albeit in another Industry.

I tell you this to establish my credibility in business matters. I think this is relevant, since I oppose PPL's application because I believe they have not made the business case to support their preferred Cross Country route nor, as a consequence, have they justified the siting of the power substation.

In my opinion, their application is light on substantive facts and heavy on conclusions.

PPL has utilized the "Trust us" approach to justifying their outcomes and has ascribed a sense of urgency through the application of fear, e.g. "Brownouts or worse if action is not taken."

I believe that after 40 years of being in the business world, I can attest to the fact that matters are not always as they appear.

PPL Contention 1 – Need:

For Example, the need for power that drives this Transmission line: how much and when we will need it has been accepted as an article of faith. PJM, the "private" organization that assesses power demand, capacity and develops forecasts has not reviewed this since they have not previously focused on upgrades of this size. It is only recently that they have begun to develop a process to review smaller requirements.

The substation and maintenance garage we are told are a natural consequence of the preferred Cross Country route. So, we build new facilities and there is no discussion of augmenting or expanding existing facilities.

And oh, if we do not get this all in place by a date certain, dire consequences will befall the region.

Where are the assumptions upon which these needs and application are founded?  
Where is PPL's risk analysis?

PPL in this case has no oversight, and they tell us "TRUST US or else! We are doing this in the best interest of the Public."

#### PPL Contention 2 – Minimal Environmental Impact:

The PPL application acknowledges that, when compared to other alternatives, their preferred Cross Country route traverses the most streams, wetlands, woodlands, flood plains, recreational land, agricultural land and a Township-proclaimed environmentally protected zone.

In their application, PPL says that they will do everything that is required of them to design, build and maintain the Cross Country route, and I presume the power substation, in accordance with all State and Federal guidelines. They assure us that there will be no harm to vegetation, wildlife or humans.

Where is the risk analysis? Where is PPL's willingness to undertake a performance bond or accept consequential liability provisions?

Your Honor, today you have heard testimony from learned, respected, certified, local environmentalists as to the pristine nature of the traversed lands and express their fears and concerns.

Why take these risks when there are more acceptable alternatives?

We have Federal and State environmental Superfunds because corporations said, "TRUST US, we are doing this in the best interest of the public."

#### PPL Contention 3 – Costs:

PPL's application cites cost as a significant justification for the Cross Country route. It is cheaper by half and more, depending upon which alternative is contrasted.

To support this conclusion, we are pointed to handwritten field notes and computer generated spreadsheets as the definite proof that they have reached the correct conclusion.

But, again, where are the assumptions upon which this analysis was based? How do their models account for the substation? What permutations were evaluated that factored in building out existing substations? How does the maintenance garage factor into the assessment? How do maintenance costs vary by alternative? And on and on.

Where is the connective tissue that makes these numbers sing, that tells the economic story? Where is the risk analysis that gives us some litmus test as to upside and downside, e.g. mitigating environmental accidents?

By now, you have gotten the beat: TRUST US.

#### PPL Contention 4 - Public Welfare:

PPL claims that they have the Public's welfare in the forefront of their decisions.

Was that the case when:

- 1) They threatened eminent domain on landowners prior to having route approval?
- 2) When they have a Public Hearing in Feb 08 that was more like a Public Telling of what PPL's decision was? What did they glean from the citizen's comments when they filed their application the same week?
- 3) When they file an application that is incomplete and begs more questions than it answers?
- 4) Do they have the Public welfare in mind when they site the transmission lines on land zoned environmentally protected?
- 5) When they fail to apply for a substation? A maintenance garage? How many times has PPL submitted applications?
- 6) Is it in the Public welfare when they undermine your property values?

7) When they tell you they are picking the lowest cost alternative to keep rates low and then in the 2nd quarter of '08, make presentations to investors touting that they are forecasting growth in earnings per share by over 80% from 2008 to 2010

TRUST US, indeed

Finally, your Honor, and thank you for your patience, as a businessman, I do not get it. Ask any successful businessperson why s/he is successful and they will tell you. "I listen to the customer."

PPL is not listening.

The hundreds that have come out today and many hundreds more who have signed petitions are saying we do not like your selection. Go back to the drawing board. There are alternatives!

For some inexplicable reason PPL has and is turning a deaf ear. I admire principal as much as the next guy but I do not understand the motivation.

That is why "TRUST US" does not work. You have to earn trust and this business case has not done so for all the reasons you are hearing from the Public, whose interest PPL avows to represent.

Your Honor, you have a daunting task in front of you. I Trust this process, and I trust you will reach a fair recommendation.

I am proud to have shared the floor with my fellow citizens.

Thank you.