

**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

**Transmission Vegetation Management Practices ) Docket No. AD11-2-000**

**Opening Remarks of  
David E. Schleicher, Vice President - Transmission  
PPL Electric Utilities Corporation**

PPL Electric Utilities Corporation ("PPL Electric Utilities") recognizes that vegetation management is a critical component of maintaining the reliability of the Bulk Electric System.

PPL Electric Utilities supports the approach taken in Reliability Standard FAC-003 to provide parameters for compliance but not dictate how individual utilities must proceed to conduct vegetation management. Individual Transmission Owners should have the flexibility and discretion to implement a program best suited for their service territory.

Since FAC-003 became mandatory and enforceable, PPL Electric Utilities has refined and improved our practices. While our existing practices changed little in June 2007 when FAC-003 became mandatory and enforceable, as a result of a self-reported concern later that year, PPL Electric Utilities began to undertake steps to improve and strengthen our Vegetation Management program. These steps included, in 2008, beginning to use a new technology to more accurately measure distances between conductors and vegetation, both in real time and at a max sag position. This technology is Light Detection and Ranging or more commonly referred to as LiDAR. We found after implementing LiDAR that other methods that relied primarily on the human eye to

assess actual distances between vegetation and conductors (such as foot patrols and helicopter patrols) were inherently subjective and inaccurate. Human eye assessment was equally inadequate for projecting maximum sag clearances.

PPL Electric Utilities notes that the current compliance enforcement and penalty environment requires absolute adherence to the Standard with zero tolerance for infractions. Faced with this compliance regime where fines can be imposed for vegetation just being in a certain area, under all operating conditions, and not just observed ones, PPL Electric Utilities determined that its historic Selective Vegetation Management approach was inadequate. We concluded that LiDAR combined with Wire Zone/Border Zone is the most effective way for PPL Electric Utilities to maintain and sustain compliance and improve reliability.

Under the Wire Zone/Border Zone management strategy, small shrubs and native grasses are permitted in the Wire Zone (the area from the center of the transmission right-of-way ("ROW") to 10 feet outside the outer conductor) but other species are not permitted. In the Border Zone – the rest of the ROW – designated compatible species are permitted. As part of our ROW reclamation efforts to implement Wire Zone/Border Zone, we have encountered some sections of ROWs with extensive incompatible species in the ROW. Initially, we typically will remove vegetation in the Wire Zone and the Border Zone and, through the selective application of herbicides, where possible, allow compatible species to grow back.

We believe this integrated approach is a best practice for our system. However, other transmission owners and utility systems may have different needs.

We understand that FAC-003, of the over 100 reliability standards, is perhaps the most visible to the public. We are doing extensive outreach in the communities we serve to educate property owners, community leaders, legislators and other stakeholders about the Wire Zone/Border Zone work we are doing to ensure compliance with the standard and to further reliability. The communications outreach we do is important as most landowners do not immediately appreciate the risk vegetation can pose. We also know that most landowners have difficulty understanding how much transmission lines may move based on different operating conditions. To date, we have faced resistance to the work by a limited number of landowners.

PPL Electric Utilities has a long history of award-winning customer satisfaction, constructive relationships with regulators and solid reliability. Our current vegetation management program is consistent with these long held corporate values.

We appreciate the Commission's support in our pursuit of efforts to maintain the reliability of the Bulk Electric System.

October 26, 2010