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| PUC logo | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  400 NORTH STREET, HARRISBURG, PA 17120 | **IN REPLY PLEASE REFER TO OUR FILE** |

November 17, 2017

Docket No. P-2017-2622393

Utility Code: 110500

CHRISTOPHER T. WRIGHT, ESQUIRE

POST & SCHELL, P.C.

17 NORTH SECOND STREET

12TH FLOOR

HARRISBURG, PA 17101-1601

RE: Petition of PPL Electric Utilities Corporation (PPL) for Approval of its Second Long-Term Infrastructure Improvement Plan (LTIIP)

Dear Mr. Wright:

PPL filed a filed a Petition seeking approval of its LTIIP on August 31, 2017. To assist the Commission in conducting the review of PPL’s LTIIP, please respond with the information requested in Attachment 1. In addition to the hard-copy filing directions, below, please also email the information, including the requested tables in Excel format, to [dawashko@pa.gov](mailto:dawashko@pa.gov).

Please forward the information to the Secretary of the Commission at the address listed below **within ten (10) days of the date of this letter**. Make sure to reference the Docket Number listed above when filing your response. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

Rosemary Chiavetta, Secretary

Pennsylvania Public Utility Commission

400 North Street

Harrisburg, PA 17120

**Your answers should be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, hereby state that the facts above set forth 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).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

If you have any questions on this matter, please contact David Washko, Bureau of Technical Utility Services, at [dawashko@pa.gov](mailto:dawashko@pa.gov), or (717) 425-7401.

 Sincerely,

Rosemary Chiavetta

Secretary

Enclosure – Attachment 1

cc: David Washko, TUS

Attachment 1

Data Request TUS-1

Docket No. P-2017-2622393

PPL Electric Utilities Corporation

1. Reference the PPL Petition, page 8, paragraphs 29 and 30
2. Explain in detail how PPL Electric defines cost-effectiveness and how these processes work in relation to cost-effectiveness savings. Assuming PPL calculates potential savings in SAIFI and SAIDI , for each potential LTIIP project, is there a threshold savings amount that must be reached? If so, what are those thresholds?
3. Provide a Table in Excel format of the projected SAIFI and SAIDI savings for each of the LTIIP project categories.
4. Reference the PPL LTIIP, Attachment 1, pages 14 & 15
   1. Is there a pre-screening process for contract bidders? For example, through a contractor of choice program, or are bids open to any contractor?
   2. Are the review meetings for all prospective bidders to the RFP, or those selected for award?
   3. How much of the LTIIP work will be contracted out, and how much of the LTIIP work will be performed by PPL employees? Does PPL employ a threshold expenditure amount to determine the work that is contracted out?
   4. Provide a sample RFP and contractor agreement/contract.
5. Reference the PPL LTIIP, Attachment 1, page 16
   1. Provide this table of the expenditures by LTTIP category in Excel format.
   2. Provide a similar table in Excel format that details the planned replaced/improved material and/or project amounts for each of the LTIIP project categories for each year of the LTIIP.
6. Reference the PPL LTIIP, Attachment 1, pages 18-20 (corrected version)
   1. The pole failure rate has increased from 5% to 10% as compared to PPL’s first LTIIP. Provide a table or chart in Excel format that details the pole failure rate from 2012 through 2017.
   2. Page 18 – Pole Replacements – the planned pole replacements indicate a range from 2,900 to 3,200 per year. The failure rate is 10%, the expected replacement rate is 25% of that 10%, which equates to 2,250 poles. The planned replacements indicate a rate of 32-35% of failed poles – explain in detail why there is an apparent discrepancy.
   3. Page 19 – Pole C-Trusses – the planned pole reinforcements indicate a range from 5,260 to 5,815 per year. The failure rate is 10%, the expected reinforcement rate is 75% of that 10%, which equates to 6,750 poles. The planned reinforcements indicate a rate of 58-65% of failed poles – explain in detail why there is an apparent discrepancy.
   4. Page 20 – Fiber Wrap – explain in detail how the poles targeted for fiber wrapping relate to the pole replacements and reinforcements on pages 18 and 19. Based on the high end of the planned fiber wraps of 645, and the estimate of 25% of rejected poles being replaced, it can be calculated that there are approximately 2,588 rejected poles per year at the high average. Explain in detail how these failed poles relate to those outlined in pages 18 and 19.
7. Reference the PPL LTIIP, Attachment 1, pages 25-28 and 49-50
   1. These project categories appear to address issues that would be covered under PPL’s distribution Operation and Maintenance (O&M), and Capital expenditures. These projects may also cover instances where expenditures could be attributed to PPL Electric’s Storm Damage Rider. These expenditures may also not be an acceleration of planned repairs, but rather replacement of defective and degraded equipment that may be part of the normal O&M or Storm Damage budget. Explain in detail how the expenditures in the project categories on pages 25-28 and 49-50 relate to PPL’s budgeted distribution O&M, Capital, and Storm Damage expenditures and how the LTIIP expenditures in these categories are an acceleration of planned repairs and replacement.
   2. Describe how PPL Electric will ensure the LTIIP expenditures for the projects described on pages 25-28 and 49-50 are not attributed to budgeted O&M, Capital, and Storm Damage expenditures, and vice versa.
   3. The project categories on pages 25-28 and 49-50 do not include the planned materials to be replaced/improved. Provide a table in Excel format that details the planned materials to be replaced/improved by each project category for each year of the LTIIP.
   4. The project category on page 50 – Repair Failed 138/69/12 kV Transformers – does not provide any planned expenditures and it is difficult to determine where this category appears in the overall expenditures outlined in the table on page 16. Provide the planned expenditures for each year of the LTIIP and explain where this category appears in the table on page 16.