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February 28, 2018

BY HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
PO Box 3265
Harrisburg, PA 17105-3265

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2018 FEB 28 PM 3:22
PA PUC
SECRETARY
FRONT
TEAU

Re: Joint Application of Pike County Light and Power Company, Corning Natural Gas Holding Corporation and Orange and Rockland Utilities, Inc. for: a Certificate or Certificates of Public Convenience Evidencing the Pennsylvania Public Utility Commission's Approval of: the Transfer by Sale of 100% of the Issued and Outstanding Stock of Pike County Light & Power Company; Docket Nos. A-2015-2517036 *et al.*; **PIKE COUNTY LIGHT AND POWER COMPANY'S CAST IRON AND BARE STEEL MAIN REPLACEMENT (CIBS) STUDY**

Dear Secretary Chiavetta:

Enclosed you will find Pike County Light & Power Company's Cast Iron and Bare Steel Main Replacement (CIBS) Study pursuant to the directives in the August 11, 2016 Order in the above-captioned docket. **Please note that the Exhibit to the CIBS Study is not subject to disclosure to third parties under the provisions and procedures specified in The Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§2141.1 to 2141.6) and the PUC's regulations implementing such Act at 52 Pa.Code §§102.1 -102.4.** Copies of this filing have been served in accordance with the attached Certificate of Service.

If you have any questions or require additional information, please contact me.

Very truly yours,



Thomas J. Sniscak
Whitney E. Snyder

TJS/WES/das
Enclosure

cc: Per Certificate of Service

Pike County Light and Power Cast Iron and Bare Steel Main Replacement Study

This Cast Iron and Bare Steel Main Replacement Study was performed on the Pike County Light and Power (PCLP) gas main system. The system is comprised of approximately 100,000 feet of main, of which 70,000 feet of pipe are in the low pressure (7-9" water column) gas system. Of these 70,000 feet, only 5000 feet are plastic pipe. The non-plastic mains vary in installation dates from the early 1910's to 1970.

The criteria for replacement considered were water infiltration (Flood Zone), material type (Cast Iron, Bare Steel, etc.) concentration of leaks (past and current repaired), size and material of the pipe, municipal paving program, and customers affected.

Included is an Exhibit of a 20-year program to systematically install and retire the non-metallic mains. For example, the first two years are to replace the gas mains that are in the highest flood zones. Then Years 3 to 4 have long spans of continuous 4" cast iron along Ave K and Delaware Ave, respectively. This proposed plan is mapped out to attain the 20 years of replacements. This attachment contains Confidential Security Information.

Pike is currently implanting this study by preparing a Distribution System Improvement Charge (DSIC) and Long-Term Infrastructure Improvement Plan (LTIIP).

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CONFIDENTIAL

EXHIBIT

VERIFICATION

I, Steven L. Grandinali, General Manager of Pike County Light and Power Company, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Steven L. Grandinali
General Manager
Pike County Light and Power Company

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FEB 28 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).


BY ELECTRONIC AND FIRST CLASS MAIL

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DATED: February 28, 2018