

Pennsylvania Summer Reliability

WEST PENN

A. Reliability Enhancement Programs

West Penn Power Company (“West Penn” or “Company”) remains committed to providing safe and reliable electric service to its customers and employs various programs to strengthen the durability and flexibility of the electric system. The Company has put into place plans, which are described in various filings, to further support reliability performance. These include a Reliability Plan,¹ Worst Performing Circuit Plan,² and the Long-Term Infrastructure Improvement Plan (“LTIIIP”).³ Components of these plans are described below.

To reduce tree related outages, West Penn performs cycle-based tree trimming which removes selected incompatible trees within the clearing zone corridor, removes certain defective limbs that are overhanging primary conductors, controls selected incompatible brush, and removes off right-of-way priority trees.⁴ West Penn performed tree trimming on 4,667 miles (which includes the removal of approximately 112,000 priority trees) in 2017 and plans to trim approximately 4,584 miles in 2018. West Penn also performs enhanced trimming which removes healthy limbs overhanging primary conductors. West Penn performed enhanced trimming on 350 miles in 2017 and plans to perform enhanced trimming on approximately 233 miles in 2018. In addition, West Penn continues the proactive removal of Ash trees that have been deemed a threat by the Emerald Ash Borer, and in 2017 approximately 44,819 Ash trees were removed.

West Penn is installing new fused cutouts on unprotected line sections to minimize outage frequency and duration and ensure the adequate protection of circuits. The Company installed fuses on sixty circuits in 2017 and plans to install fuses on at least 100 circuits in 2018.

West Penn performs targeted circuit rehabilitation in zones one and two,⁵ focusing on circuits having a high rate of equipment and line failure and animal-caused outages. Equipment that may be replaced includes crossarms, capacitors, insulators, lightning arresters and cutouts. Forty-four circuits were rehabilitated in 2017. West Penn plans to rehabilitate at least thirty-five circuits in 2018.

Select worst performing circuits have been targeted for enhanced circuit rehabilitation in zones one and two, which can include hardware rehabilitation, coordination review, installation of additional protective devices as well as reclosers. Eight worst performing circuits received enhanced rehabilitation in 2017 and the Company plans to target an additional six to eight worst performing circuits in 2018.

¹ On March 30, 2015, the Commission issued an order directing, West Penn Power to prepare and file a revised implementation plan relating to specific topics addressed in the report issued by the Commission’s Bureau of Audits on February 12, 2015. *Implementation Plan for the Focused Management Audit of West Penn Power*, Docket No D-2013-2365994,

² See Footnote 1.

³ On October 19, 2015, pursuant to Section 1352 of the Pennsylvania Public Utility Code, 52 Pa. Code §§ 121.1 et seq. and the Commission’s final order in Implementation of Act 11 of 2012, West Penn Power Company filed their petition for approval of its LTIIIP at Docket No. P-2015-2508931. On February 11, 2016 the Commission approved the plan.

⁴ Trees located off the right-of-way that are either dead, diseased, declining, structurally compromised, severely leaning or significantly encroaching onto the right-of-way.

⁵ Zone one is defined as the portion of the circuit from the substation breaker to the first protective device. Zone two is defined as the three-phase conductor and devices after the first protective device.

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New electronic reclosers with supervisory control and data acquisition (“SCADA”) control are being installed at targeted substations as part of the enhanced overcurrent protection program. Adding SCADA control to electronic reclosers in select substations with existing SCADA capabilities limits the number of customers affected, provides additional monitoring and allows for remote switching to restore customers at the circuit level more quickly. West Penn replaced a total of twenty-eight breakers with electronic reclosers in 2017 and plans to install twenty to thirty electronic reclosers in 2018.

Aging electro-mechanical relay controls and switches and automated subtransmission switching locations are being replaced with newer technology. The installation of SCADA controlled reclosers and switches and automatic switch modernization will provide enhanced sectionalizing for larger blocks of customers at the substation level. The SCADA controlled switches are designed to allow for remote switching to restore large blocks of customers more quickly. West Penn installed seventy-two automatic reclosers or switches at its substations in 2017 and plans to install at least fifty reclosers or switches in 2018.

Substation exit cables that were manufactured without an insulating jacket, causing the concentric neutral wire to corrode and fail prematurely, are being replaced. By replacing these exit cables, West Penn will reduce the interruptions to a circuit associated with the cable as well as the long interruption times associated with the replacement. West Penn replaced exit cables at thirteen substations in 2017 and exit cables at ten substations are targeted to be replaced in 2018.

To improve infrastructure, the Company replaces wood poles that have degraded beyond restorable condition and reinforces poles that are restorable. West Penn replaced or reinforced 273 wood poles in 2017 and plans to replace or reinforce approximately 270 wood poles in 2018.

Bare concentric neutral cable is being replaced as part of West Penn’s underground residential distribution cable replacement program. This type of cable was manufactured without an insulating jacket, causing the concentric neutral wire to corrode and fail prematurely. West Penn replaced 8,392 feet of cable in 2017 and plans to replace approximately 7,920 feet of cable in 2018.

Substation circuit breakers, station transformers and other substation equipment, such as insulators, switches, buses, arresters and conductors that are obsolete or in poor condition are being replaced with new equipment. Proactively replacing older equipment increases substation reliability and reduces the occurrence of equipment failure. West Penn replaced sixty-nine pieces of equipment in 2017 and plans to replace at least eighty-six pieces in 2018.

Improvement projects focusing on clusters of customers experiencing multiple interruptions of line protection devices are being implemented to enhance system performance as well as reduce the frequency of outages at the customer level that might not be addressed when targeting overall system metrics. Twenty-one projects were completed in 2017, and West Penn plans to complete at least forty projects in 2018.

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B. Preventative Maintenance Programs

In accordance with 52 Pa. Code § 57.198, every two years West Penn files a Biennial Inspection, Maintenance, Repair and Replacement Plan⁶ for approval by the Commission. This Biennial Plan is designed to reduce the risk of outages on the Company's system and form the basis for the Company's inspection and maintenance objectives. The Biennial Plan includes programs to conduct vegetation management, pole inspections, distribution overhead line inspections, distribution transformer inspections, recloser inspections and substation inspections.

These well-established maintenance programs ensure the existing system will continue to operate in a safe and reliable manner and serve to identify any potential system issues so that they can be proactively addressed.

C. Capacity Planning

Due to ongoing system enhancements and the hard work of employees and contractors, West Penn is able to reliably serve its customers. The primary driver of customer demand this summer is again expected to be warm temperatures across the region.

West Penn does not foresee significant concerns with system delivery capacity during the upcoming summer based on its performance during last summer's peak. Ongoing facility enhancements designed to improve reliability, load-bearing upgrades, and customers' adoption of energy efficiency and conservation opportunities are being viewed as additional opportunities to ensure the reliability and capacity availability of the system.

D. 2017/2018 Storm Update and Lessons Learned

In calendar year 2017, West Penn experienced three major events. During any weather event, safety remains the number one priority.

On May 1-5, 2017, 77,458 customers were affected when severe thunderstorms and high winds impacted West Penn's service territory. West Penn experienced wind gusts between sixty and seventy miles per hour in the first twenty-four hours of the storm, and gusts between forty and fifty miles per hour over the next twelve hours. Restoration efforts were slowed by heavy rains, high winds, downed trees and inaccessible roads.

On June 23-25, 2017, 1,665 customers in Greene County were affected when thunderstorms produced over four inches of rain, causing severe flooding. Restoration

⁶ Pursuant to 52 Pa. Code § 57.198, every two years an electric distribution company shall file, and receive approval from the Commission of, a biennial plan for the periodic inspection, maintenance, repair and replacement of its facilities. On March 4, 2016, Paul Diskin, Director, Technical Utility Services, issued a letter approving the Companies' biennial inspection, maintenance, repair, and replacement plan effective January 1, 2017 through December 31, 2018. Further, on September 29, 2017, West Penn submitted the plan effective January 1, 2019 through December 31, 2020.

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efforts were significantly delayed due to impassible roads from floodwaters that reached five feet in some areas.

On July 28-30, 2017, 3,748 customers were affected when thunderstorms produced five inches of rain, causing severe flooding. Restoration efforts were significantly delayed due to impassible roads from floodwaters that reached five feet in some areas.

Throughout restoration efforts, working safely and efficiently is the main objective. Regional conference calls are held for preparation and logistics planning. Effective planning allows for the precise deployment of crews, supplies, and equipment. Employees are also staggered around the clock to maximize productivity.

After each significant storm event, West Penn leadership conducts post storm review meetings to identify and disseminate lessons learned which are used to improve the emergency response plan.

E. 2018 Summer Readiness

Capacitor Inspections – By June 1, 2018, West Penn will have inspected all line capacitor banks and completed all necessary repairs or replacements to ensure at least 98% availability.

Substation – By June 1, 2018, West Penn will have inspected all substation capacitor banks and completed necessary repairs or replacements to ensure minimum 98% available reactive support. In addition, a review of spare equipment will have been completed. Spare equipment includes voltage regulators and substation cooling items such as transformer fans.

Capacity Additions

- **Keister – Campbell 138 kV Line Conversion** – This project rebuilt the West Penn Power portion of the Keisters – Campbell 69 kV line to operate at 138 kV. This equipment is already in service.

Transmission Preparedness – An annual transmission readiness review is conducted with the transmission operations department to discuss the capability and reliability of the system for the summer. The detailed review did not reveal any significant issues for the summer of 2018. Based on the system conditions modeled, the West Penn transmission system is expected to sufficiently support the forecasted peak summer loading.

Two aerial patrols are conducted annually by West Penn to inspect transmission facilities. The purpose of routine patrols is to ensure the integrity of in-service transmission lines to maintain safe and reliable service. The first aerial patrol has been completed and the second will be completed by year end.

Additionally, PJM Interconnection LLC (“PJM”) has operational procedures identified to effectively control and mitigate contingency outage conditions on the transmission system.

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West Penn has operational procedures to implement any PJM required actions and to mitigate contingency conditions on the lower voltage systems (<100kV).

Emergency Exercise – As part of the FirstEnergy Utilities (“FEU”) Emergency Preparedness program, West Penn completed an emergency exercise on May 2, 2018. The exercise facilitated the testing and validation of key emergency response roles, systems and processes. The primary objective of the exercise was to ensure a complete understanding of the restoration process by all participants through exposure to a variety of real-world scenarios and decision-making challenges that could be experienced during actual restoration events.

Event Preparedness – FirstEnergy’s in-house meteorologists use highly sophisticated, proprietary data and forecasting models specifically designed to provide actionable intelligence. When predicted weather meets specific criteria, planning and preparation work is immediately initiated, often days before forecasted impact.

As part of the preparation efforts, West Penn’s executive leadership and operations managers implement the emergency restoration process. Based on available data, resource needs are evaluated, and requests are submitted to the FEU Emergency Operations Center. These requests can include, but are not limited to: line resources (both internal to FirstEnergy and external), hazard responders, damage assessors, public protectors, vegetation crews, and equipment and material needs. Depending on the predicted magnitude of the event, pre-identified staging areas can be quickly activated to prepare for the efficient deployment of crews and equipment.

Refresher Training – All employees with emergency response roles receive appropriate refresher training at specified intervals to ensure they are immediately deployable when an event impacts the system. Expectations for employees to complete appropriate training and verify all equipment and personal protective equipment are available and in proper working order are communicated each year during the emergency exercise and verified by West Penn management.

Staffing – West Penn is appropriately staffed for the 2018 summer storm season. West Penn performs an annual staffing analysis that accounts for attrition, including retirements, to determine the proper staffing levels of craft workers. West Penn then enrolls students in the Power Systems Institute (“PSI”) based on the results of the analysis. PSI is a unique, two-year program that combines classroom learning with hands-on training. West Penn hired twenty-seven line worker graduates and nine substation electrician graduates in 2018. The objective of the PSI program is to proactively hire a diverse group of individuals that will fulfill the line work and substation electrician staffing needs for West Penn. The following colleges have partnered with West Penn to support these line worker and substation electrician development:

- Westmoreland County Community College
- Pennsylvania Highlands Community College

For larger-scale events, West Penn is able to supplement its own resources by accessing FirstEnergy’s portfolio of operating companies that includes the additional three companies

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located within Pennsylvania, as well as an additional six operating companies in other jurisdictions. The consistency in standards and work practices employed across all ten of these operating companies enables streamlined resource sharing in a way that promotes both safety and efficiency.

FirstEnergy, for itself and its affiliated operating companies, including West Penn, is a member of the following Regional Mutual Assistance Groups (“RMAGs”) and can call upon them to request additional resources when needed:

- Great Lakes Mutual Assistance Group
- North Atlantic Mutual Assistance Group
- Southeastern Electrical Exchange

A National Response Event can be activated by Edison Electric Institute member utilities when multiple RMAGs cannot adequately support the resource requirements of the requesting utilities. In addition to working with RMAG organizations, FirstEnergy works with non-RMAG utility companies and contractors to secure resources.

F. Storm Response

Outage Restoration Strategy – West Penn begins preparing for potential outages long before severe weather hits. When inclement weather is forecasted, West Penn plans are activated to ensure an adequate number of crews are prepared to restore service to customers. Part of this preparation includes running a model that estimates the impact of an impending weather threat and calculates the expected number of customers impacted. This output, along with historical storm experience, is used to estimate the impact of the weather event so that properly scaled preparations can be made.

Information obtained through various tools and resources is critical to determine the type, number and location of resources needed to assure prompt restoration of service. Line personnel, damage assessors and hazard responders are integral resources in providing initial and ongoing assessments of the damage in the field. Line personnel are equipped with mobile data terminals (“MDT”) in their vehicles and will enter damage information directly into the MDT. This information is immediately available for viewing in the Outage Management System (“OMS”). The OMS is the central collection point for all relevant information concerning damage reports, assessment and configuration of the electric distribution system. During emergencies that meet triggering criteria, the circuit quarantine process is used for rapid assessment and repair of heavily damaged circuits. Additionally, there are two apps that employees can use on mobile devices to automatically enter damage information into the Company's OMS.

In response to power outages and other systems emergencies, FirstEnergy maintains a copy of its Emergency Plan for Service Restoration which provides the guidelines for all common processes and procedures for conducting emergency preparedness, response and service restoration. Further, West Penn is in the process of incorporating Incident Command System principles into its emergency response organization to adhere to the principles and

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high-level structure of the National Incident Management System as appropriate in an electric utility environment.

Communications and Outreach – External Affairs managers establish communications with emergency management agencies, local officials, county commissioners, and legislators and their offices in advance of and throughout a storm to keep them apprised of preparation and planning efforts. Communications representatives also contact the media to enlist their help in encouraging customers to prepare for the likely storm events and provide information on who to call if they lose power. Proactive email alerts and phone messages are initiated to key stakeholders alerting them of the potential for extended power outages. These efforts and face-to-face outreach are closely aligned with the Company's service restoration efforts. The Company also provides safety messages via newspapers, radio, and online banner ads.

West Penn customers can stay abreast of restoration progress through a variety of means. A customer can access the Storm Restoration Process page of the Company's website to learn about the damage assessment and repair prioritization processes as well as the importance of customer calls and outage reporting during the restoration process. Customers can access the 24/7 Power Center outage map that provides county-by-county information. Through this site users can obtain the number of customers served and the number of customers out of power at the county level as well as estimated time of restoration ("ETR") information. In addition, the 24/7 Power Center outage map shows the status of crews restoring service, and informs customers when crews have been dispatched, when they are working on a repair and when additional crews or equipment are needed to complete restoration work.

West Penn's mobile website and mobile app allow customers to report outages and connect to the 24/7 Power Center outage map which has been optimized for mobile devices. From the mobile site, customers can view personalized outage status for an outage they have reported. The mobile website and app, as well as the full West Penn website, also allow customers to register for outage-related alerts via text messages and/or email. These platforms also provide instructions to use two-way text messaging, an interactive option for customers to report outages and obtain outage updates.

Furthermore, West Penn uses Twitter and Facebook to share additional safety reminders, ETRs, updates on restoration efforts, explanations of the restoration process and information about the arrival of additional crews, water and ice locations, and links to other resources such as shelters.

In addition, Interactive Voice Response ("IVR") messaging is used to communicate restoration information to customers. Messaging is also relayed to customers who have called West Penn regarding their individual outage. Live agent customer service representatives are available and have the same information at their disposal.

For extended power outages, Communications issues regular news releases and media advisories over both traditional media channels and social media to update customers on the status of power restoration efforts, as well as provide realistic ETRs so customers can plan accordingly. Communications proactively issues safety messaging ranging from

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avoiding downed wires to properly hooking up and operating generators. The Company also has plans in place to provide free water and ice to customers without service. Once locations have been determined, this information is communicated to customers via the IVR, press releases, social media and the website.

Outage Restoration and Storm Response Best Practices – West Penn continues to review each storm event, and many of the practices adopted as mentioned above stemmed from sharing best practices with other utilities, a practice that continues today.