

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Advance Notice of Proposed Rulemaking for : Docket No. L-00040167
Revision of 52 PA Code Chapter 57 pertaining :
to Adding Inspection and Maintenance Standards :
for the Electric Distribution Companies :

COMMENTS OF DUQUESNE LIGHT COMPANY

I. INTRODUCTION

Duquesne Light Company (“Duquesne”) hereby submits its comments at the above-captioned docket in response to the Pennsylvania Public Utility Commission’s (“Commission”) Advance Notice of Proposed Rulemaking Order and Request for Comments pertaining to adding inspection and maintenance (“I&M”) standards for electric distribution companies (“EDC”). The Proposed Rulemaking Order was issued by the Commission on November 29, 2004, and published in the Pennsylvania Bulletin on December 11, 2004 at 34 Pa.B. 6550.

II. SPECIFIC COMMENTS

Duquesne provides the following comments to the proposed rulemaking.

1. Whether it is appropriate for the Commission to adopt specific inspection and maintenance standards.

Duquesne believes that it is not appropriate for the Commission to adopt specific I&M standards. Setting I&M standards while also requiring performance meeting reliability benchmarks removes a company’s ability to manage its own work processes in order to work at its most efficient levels to meet its performance goals. Utilities use various company-specific

combinations of predictive maintenance, preventive maintenance, reliability-centered maintenance and inspection techniques to manage reliability. Duquesne prepares its maintenance plans in order to manage its system reliability. These plans are somewhat dynamic in nature. If the Company monitors failures and detects a trend that warrants aggressive maintenance to a certain type of equipment, it needs the ability to shift resources. If Duquesne is required by the Commission to perform a specified number of inspections of other equipment types, those resources may not be available to the Company. The Commission should not determine each company's work plans.

I&M programs are affected by utility-specific factors, such as:

- Urban vs. rural customer base
- Customer density
- Municipal and other customer work restrictions (traffic control, restricted work hours, etc.)
- Geographical characteristics
- Overhead vs. underground lines
- Customer growth rates
- Diverse tree species and associated growth rates
- Variable tree density in different urban centers
- Local weather patterns (lightning, ice, wind, tornadoes, etc.) and inherent resulting problem areas (i.e., specific areas prone to landslides, washouts, etc.)
- Local agreements (municipal, permitting, union, etc.)
- Right-of-way easement granted rights and restrictions (public right-of-way vs. private right-of-way).

Utilities also differ in terms of infrastructure, such as:

- Construction type
- Voltage class
- Feeder length
- Age
- Equipment duty cycles
- Protective devices utilized
- System automation and transfer capabilities
- Equipment loading
- Circuit design (looped versus radial system design)

Non-controllable, non-excluded weather events continue to be a significant contributor to reliability variability. Healthy trees falling from outside of the maintenance rights-of-way are not controllable. Poor weather adversely affects trees and equipment to differing, varying extents. EDC vegetation management programs can monitor and address controllable (visible and imminent) vegetation issues. Non-preventable (not visible or imminent) occurrences are beyond the realm of reasonable control.

Duquesne believes that the Commission should be apprised of I&M programs, not prescribe them. Utilities have extensive experience managing transmission and distribution systems. New technologies, equipment and work practices result in new workplace efficiencies. Consideration and adoption of new efficiencies would in fact be discouraged by prescribed I&M standards.

2. **Whether standards should be placed in the regulations which are specific to each individual EDC, or whether all EDCs should be held to the same standard, and how would this be monitored and regulated.**

For the reasons stated in Item 1 above, I&M standards of any type, whether uniform standards across all EDC types or specific standards for each EDC, are not appropriate.

3. **What the standards should be regarding vegetation management practices, pole inspections, transmission and distribution line inspections, substations, transformers, reclosers, and other types of inspection and maintenance practices.**

Each EDC has its own frequencies for inspecting and maintaining equipment and managing vegetation cycles. The Commission has the authority to review and approve these cycles. If EDC reliability targets are not achieved, further actions can be addressed between the Commission and that company, as is currently done, on a case specific basis.

4. **Whether standards should be established for repair and maintenance of electric distribution company equipment or facilities that are critical for system reliability.**

The issue here is what is deemed to be “critical”. Any definition of “critical” regarding distribution systems would be subjective and would depend on the multiple variables described in Item 1 above. As stated above, if EDC reliability targets are not achieved, further actions can be addressed between the Commission and that company on a case by case basis.

5. **Whether there should be automatic civil penalties written into the regulations for failure to meet standards for more than three consecutive quarters or some other**

reasonable time period, depending upon the type of inspection and maintenance that is at question.

Any penalties or rewards, if deemed necessary by the Commission, should be based on the EDC's performance (the reliability indices) and not on I&M practices and standards. An EDC's management of its own system maintenance is reflected in its performance measures.

III. CONCLUSION

Duquesne appreciates the opportunity to comment on this proposed rulemaking.

Each EDC tailors its inspection and maintenance programs to meet the Commission's reliability targets and achieve a corresponding level of customer satisfaction.

The Commission has opportunities to review progress and results by way of quarterly and annual reliability reports, customer-reported complaints, customer satisfaction surveys and individual company meetings. Prescribing I&M standards and potentially implementing automatic penalties places unnecessary additional burdensome requirements on companies with satisfactory performance.

Respectfully submitted,



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