

April 29, 2011

RECEIVED

APR 29 2011

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: 1st Quarter 2011 Reliability Report – West Penn Power Company - Pursuant to
52 Pa. Code §57.195(d) and (e)

Dear Secretary Chiavetta:

L-00030161

Enclosed for filing on behalf of West Penn Power Company is an original and six (6) copies of the
1st Quarter 2011 Reliability Report, pursuant to 52 PA Code §57.195(d) and (e).

In addition, pursuant to 52 Pa. Code § 57.195(l), West Penn Power is requesting approval from the
Commission to revise its approved Biennial Inspection & Maintenance plan. West Penn Power is
respectfully submitting as an addendum to this quarterly reliability report prospective revisions to
its plan and a discussion of the reasons for the revisions.

Sincerely,



Douglas S. Elliott
President, Pennsylvania Operations
(610) 921-6060
elliottd@firstenergycorp.com



Eric J. Dickson
Director, Operations Services
(330) 384-5970
dicksone@firstenergycorp.com



RECEIVED
APR 29 2011
PUBLIC UTILITY COMMISSION
SECRETARIAT BUREAU

2011 1st Quarter Reliability Report

West Penn Power Company

Pursuant to 52 Pa. Code § 57.195(d) and (e)

1st Quarter 2011 Reliability Report – West Penn Power Company

The following 1st Quarter 2011 Reliability Report is filed on behalf of West Penn Power Company (“West Penn Power”) for the period-ending March 31, 2011.

Section 57.195(e)(1): A description of each major event that occurred during the preceding quarter, including the time and duration of the event, the number of customers affected, the cause of the event and any modified procedures adopted in order to avoid or minimize the impact of similar events in the future.

Major Events

West Penn Power did not experience a major event during the reporting period ending March 31, 2011.

Section 57.195(e)(2): Rolling 12-month reliability index values (SAIFI, CAIDI, SAIDI, and if available MAIFI) for the EDC's service territory for the preceding quarter. The report shall include the data used in calculating the indices, namely the average number of customers served, the number of sustained customer interruptions, the number of customers affected, and the customer minutes of interruption. If MAIFI values are provided, the report shall also include the number of customer momentary interruptions.

Reliability Index Values

1Q 2011 (12-Mo Rolling)	West Penn Power		
	Benchmark	12-Month Standard	12-Month Actual
SAIFI	1.05	1.26	1.15
CAIDI	170	204	189
SAIDI	179	257	217
Customers Served ^a	713,690		
Number of Sustained Interruptions	16,355		
Customers Affected	819,897		
Customer Minutes	154,646,102		

West Penn Power for 1st Quarter 2011 are:

West Penn Power	
SAIFI	9% better than Commission's 12-Month Standard
CAIDI	7% better than Commission's 12-Month Standard
SAIDI	16% better than Commission's 12-Month Standard

^a Represents the average number of customers served during the reporting period.

Section 57.195(e)(3): Rolling 12-month reliability index values (SAIFI, CAIDI, SAIDI, and if available, MAIFI) and other pertinent information such as customers served, number of interruptions, customer minutes interrupted, number of lockouts, and so forth, for the worst performing 5% of the circuits in the system. An explanation of how the EDC defines its worst performing circuits shall be included.

Worst Performing Circuits – Reliability Indices

West Penn Power's ranking of the 5% Worst Performing Circuits are provided in Attachment A of this report.

Section 57.195(e)(4): Specific remedial efforts taken and planned for the worst performing 5% of the circuits identified in paragraph (3).

Worst Performing Circuits – Remedial Action

West Penn Power's Remedial Actions for its 5% Worst Performing Circuits are provided in Attachment B of this report.

Section 57.195(e)(5): A rolling 12-month breakdown and analysis of outage causes during the preceding quarter, including the number and percentage of service outages, the number of customers interrupted, and customer interruption minutes categorized by outage cause such as equipment failure, animal contact, tree related, and so forth. Proposed solutions to identified service problems shall be reported.

Outages by Cause

Outages by Cause – West Penn Power

Outages by Cause				
1st Quarter 2011 12-Month Rolling	West Penn Power			
Cause	Customer Minutes	Number of Sustained Interruptions	Customers Affected	% Based on Number of Outages
Trees - Off Right of Way	59,046,900	3,911	194,412	24%
Weather	30,100,003	1,783	93,675	11%
Overhead Line Material	9,389,970	1,771	94,780	11%
Unknown	10,594,612	1,738	80,491	11%
Animals	3,352,053	1,469	43,680	9%
Public/Customer	11,016,135	1,418	108,737	9%
Overhead Line Equipment	2,384,037	1,255	27,364	8%
Trees - On Right of Way	15,491,757	1,082	57,093	7%
Overhead Wire	6,162,597	1,001	58,899	6%
Underground Cable	2,399,861	491	14,609	3%
Other	1,364,246	168	16,844	1%
Substation Equipment	2,772,513	110	26,292	1%
Underground Line Equipment	304,821	106	1,541	1%
Underground Line Material	253,387	40	1,459	0%
Service Equipment	13,212	12	21	0%
TOTAL	154,646,102	16,355	819,897	100%

Proposed Solutions – West Penn Power

Reliability Improvement Program (RIP)

West Penn Power maintains a Reliability Improvement Program to help address poor performing distribution circuits. Many of the Ensure Reliability Service (ERS) programs, such as Annual Inspection and Maintenance (AIM), Pole Inspection, Vegetation Maintenance, etc., are performed on a scheduled basis. RIP provides a way to address circuit reliability problems outside of these scheduled maintenance activities.

The RIP teams conduct a detailed review of the poorest performing circuits and, if necessary, an improvement plan is developed. In addition to the poor performing circuits, the RIP teams will also investigate any circuit which has been interrupted multiple times in the prior twelve month period and corrective action is planned as necessary. To focus on isolated problems, the RIP teams will also investigate any sectionalizing device (line fuse or recloser) that has operated multiple times in a twelve month period and corrective action is planned as necessary.

Expanded Forestry Danger Tree Program

West Penn Power's Danger Tree Program consists of removing, or significantly reducing in height, diseased or damaged trees located outside the boundary of the right-of-way (off ROW) that pose a threat to service reliability and/or the integrity of the line under any weather condition. Beginning in 2003, West Penn Power began targeting live, healthy trees as well that pose a threat to service reliability and/or integrity of the line by uprooting, breaking, or otherwise falling into the line.

Reliability-based Vegetation Management Program

Rural distribution circuits are scheduled based on a predetermined formula which factors in time since last trimmed, tree related CMI over at least three years, and the number of customers on the circuit. Rural circuits with the worst cumulative ranking should be made highest priority when scheduling. Circuits trimmed within the past three years are not eligible for schedule trimming evaluation. Urban distribution circuits are planned on a cyclical schedule based on time since last trimmed. If multiple urban circuits are scheduled for the same year, reliability stats will further prioritize for scheduling purposes.

Section 57.195(e)(6): Quarterly and year-to-date information on progress toward meeting transmission and distribution inspection and maintenance goals/objectives (for first, second and third quarter reports only).

T&D Inspection and Maintenance Programs

Inspection and Maintenance 2011		West Penn Power		
		Planned	Completed	
		Annual	1Q	YTD
Forestry	Transmission (Miles)	125	12	12
	Distribution (Miles)	2,800	220	220
Transmission	Aerial Patrols	1	0	0
	Groundline	167	0	0
Substation	General Inspections	5,050	1,523	1,508
	Transformers	390	142	142
	Breakers	271	103	103
	Relay Schemes	536	45	45
Distribution	Capacitors	1,331	1,203	1,203
	Poles	52,395	0	0
	Reclosers	337	74	74
	Radio-Controlled Switches	West Penn Power has no radio-controlled switches.		

Section 57.195(e)(7): Quarterly and year-to-date information on budgeted versus actual transmission and distribution operation and maintenance expenditures in total and detailed by the EDC's own functional account code or FERC account code as available. (For first, second and third quarter reports only).

Budgeted vs. Actual T&D Operation & Maintenance Expenditures

T&D O&M - 1Q / YTD March 31, 2011					
Category	1Q Actuals	1Q Budget	YTD Actual	YTD Budget	Annual Budget
Distribution Administration	(677,796)	(294,357)	(677,796)	(294,357)	(890,209)
Distribution System Operations	441,426	482,472	441,426	482,472	1,391,119
Asset Management	25,675	155,458	25,675	155,458	587,144
Distribution Support	1,927,334	1,239,195	1,927,334	1,239,195	8,033,641
Field Operations	4,534,640	4,376,041	4,534,640	4,376,041	17,744,239
Distribution Forestry	2,342,919	4,371,296	2,342,919	4,371,296	13,691,518
Transmission Other	252,720	159,523	252,720	159,523	534,731
Substations	1,244,880	982,770	1,244,880	982,770	3,836,786
Technical Services - Delivery	687,546	688,315	687,546	688,315	2,421,154
Transmission Forestry	442,498	158,778	442,498	158,778	2,318,254
Transmission Projects	(17,891)	97,227	(17,891)	97,227	368,561
Transmission Siting	117,586	166,640	117,586	166,640	763,312
Distribution Safety, Training, Quality Assurance	140,120	184,005	140,120	184,005	646,913
Transmission Reliability and System Support	61,770	42,790	61,770	42,790	136,514
EMS Support	210,792	204,461	210,792	204,461	725,576
Transmission System Operations	434,632	424,814	434,632	424,814	1,212,273
Transmission Operations Administration	20,183	31,999	20,183	31,999	91,925
Transmission Engineering and Operations Administration	101,848	101,939	101,848	101,939	427,269
Transmission Planning and Compliance	75,922	107,597	75,922	107,597	351,672
Transmission Engineering	738,828	766,409	738,828	766,409	3,097,768
	13,105,631	14,447,371	13,105,631	14,447,371	57,490,160

NOTE: Budgets subject to change

Section 57.195(e)(8): Quarterly and year-to-date information on budgeted versus actual transmission and distribution capital expenditures in total and detailed by the EDC's own functional account code or FERC account code as available. (For first, second and third quarter reports only).

Budgeted vs. Actual T&D Capital Expenditures

T&D Capital- 1Q / YTD March 31, 2011					
Category	1Q Actuals	1Q Budget	YTD Actual	YTD Budget	Annual Budget
EHV Substation	437,393	586,349	437,393	586,349	3,859,969
EHV Lines	45,934	91,927	45,934	91,927	3,804,002
Transmission Substations	606,305	701,153	606,305	701,153	7,437,622
Transmission Lines	961,136	2,722,023	961,136	2,722,023	21,390,630
Distribution Substations	2,175,445	3,971,450	2,175,445	3,971,450	11,988,728
Distribution Lines	14,211,841	10,106,132	14,211,841	10,106,132	44,566,738
General Plant	1,906,539	2,602,047	1,906,539	2,602,047	7,087,482
Subtransmission Lines	401,290	(345,692)	401,290	(345,692)	1,197,351
	20,745,883	20,435,389	20,745,883	20,435,389	101,332,522

NOTE: Budgets subject to change

Section 57.195(e)(9): Dedicated staffing levels for transmission and distribution operation and maintenance at the end of the quarter, in total and by specific category (for example, linemen, technician, and electrician).

Staffing Levels

West Penn Power 2011					
Department	Staff	1Q	2Q	3Q	4Q
Line	Leader / Chief	87			
	Lineman	42			
	Serviceman	133			
Substation	Leader	14			
	Electrician	47			
Transmission	Leader	1			
	Lineman	4			
	Total	328			

Section 57.195(e)(10): Quarterly and year-to-date information on contractor hours and dollars for transmission and distribution operation and maintenance.

Contractor Expenditures

Contractor expenses are billed on a lump sum basis and as such, hourly information is not available.

Contractor Expenditures 2011 (\$)					
	1Q	2Q	3Q	4Q	Total
West Penn Power	891,214				891,214

Section 57.195(e)(11): Monthly call-out acceptance rate for transmission and distribution maintenance workers presented in terms of both the percentage of accepted calls-out and the amount of time it takes the EDC to obtain the necessary personnel. A brief description of the EDC's call-out procedure should be included when appropriate.

Call-out Acceptance Rate

Call-out percentage is defined as the number of positive responses to total calls.

Call-out Acceptance Rate - 2011	
	West Penn Power
January	41%
February	39%
March	42%

Call-out Acceptance Rate

Larger utilities report the amount of time it takes to obtain the necessary personnel during call-outs. West Penn Power has worked with other utilities to ensure consistency in calculating and reporting this data.

West Penn Power					
2011	Total Call-Outs	Workers Accepting	Elapsed Time (Minutes)	Average Response Time per Crew Call-Out (Minutes)	Average Response Rate Per Workers Accepting (Minutes)
January	662	597	2,165	3.27	3.63
February	763	701	2,614	3.43	3.73
March	915	857	3,641	3.98	4.25
1Q Total	2,340	2,155	8,420	3.60	3.91

Total Call-outs = Total number of incidents

Workers Accepting = Total number of employees accepting work offered

Elapsed Time = Time of day called minus time of day accepted (expressed in minutes)

Average Response Time Per Crew Call-Out = Elapsed Time divided by Total Call-Outs

Average Response Time Per Workers Accepting = Elapsed Time divided by Workers Accepting

ATTACHMENT A

Worst Performing Circuits - Reliability Indices

Blank Page

West Penn Power calculates the DCII to provide a single index for ranking circuits. The DCII compares the SAIFI, SAIDI, CAIDI and ASAI for each circuit to the 5-year system averages of each index and combines them into a single index.

West Penn Power												
Circuit Rank	Substation	Circuit Desc	District	Average Customers	Outages	Lockouts	Customer Minutes	Customers Affected	DCII	SAIDI	SAIFI	CAIDI
1	MERRITTSTOWN	BRIER HILL	UNIONTOWN	408	23		1,432,267	658	(246)	3,506	1.61	2,177
2	MERRITTSTOWN	REPUBLIC	UNIONTOWN	1,631	71		5,728,293	6,680	(181)	3,512	4.10	858
3	WEST FINLEY	WEST FINLEY	JEFFERSON	132	26		443,733	415	(179)	3,359	3.14	1,069
4	VESTABURG DISTRIBUTION	MEXICO	JEFFERSON	587	66		2,016,441	2,371	(176)	3,434	4.04	850
5	FOOTEDALE	FOOTEDALE	UNIONTOWN	1,205	54		3,745,972	3,264	(167)	3,108	2.71	1,148
6	LAGONDA	PROSPERITY	WASHINGTON	473	62		1,430,881	1,872	(148)	3,023	3.95	764
7	MAXWELL	MAXWELL	UNIONTOWN	208	9		415,599	230	(135)	1,995	1.10	1,807
8	MERRITTSTOWN	MERRITTSTOWN	UNIONTOWN	856	21		1,850,647	1,522	(112)	2,161	1.78	1,216
9	WATERVILLE	WATERVILLE	STATE COLLEGE	354	37		775,174	3,213	(111)	2,191	9.08	241
10	MARIANNA	MARIANNA	JEFFERSON	761	55		1,824,255	2,617	(105)	2,398	3.44	697
11	MARIANNA	TEN MILE	JEFFERSON	348	26		787,654	828	(105)	2,266	2.38	951
12	AMITY	AMITY	WASHINGTON	511	31		1,116,499	1,266	(97)	2,184	2.48	882
13	VESTABURG DISTRIBUTION	LOW HILL	JEFFERSON	707	55		1,534,250	2,449	(88)	2,171	3.47	626
14	JOURDAN	COMMERCIAL#1	UNIONTOWN	294	4		416,245	295	(77)	1,416	1.00	1,411
15	LONG FARM SHAFT	LONG FARM SHAFT	WASHINGTON	122	8		240,488	363	(76)	1,979	2.99	663
16	VANCEVILLE	VANCEVILLE	CHARLEROI	1,344	113		2,556,349	3,746	(71)	1,903	2.79	682
17	NORTH UNION	OLIVER	UNIONTOWN	754	72		1,233,269	1,276	(66)	1,636	1.69	967
18	EAST MILLSBORO	EAST MILLSBORO	UNIONTOWN	173	18		302,474	496	(59)	1,752	2.87	610
19	FOOTEDALE	NEW SALEM	UNIONTOWN	1,043	55		1,744,079	2,355	(58)	1,673	2.26	741
20	LARDIN	MCCLELLANDTOWN	UNIONTOWN	559	28		953,703	1,399	(58)	1,705	2.50	682
21	ARENSBURG	ARENSBURG	UNIONTOWN	135	6		194,977	191	(57)	1,444	1.41	1,021
22	RICHEYVILLE	CENTERVILLE	CHARLEROI	941	35		1,632,998	3,189	(56)	1,736	3.39	512

West Penn Power												
Circuit Rank	Substation	Circuit Desc	District	Average Customers	Outages	Lockouts	Customer Minutes	Customers Affected	DCI	SAIDI	SAIFI	CAIDI
23	VESTABURG DISTRIBUTION	FREDERICKTOWN	JEFFERSON	841	23		1,451,041	3,440	(56)	1,725	4.09	422
24	PANCAKE	VANCE	WASHINGTON	387	12		558,437	561	(56)	1,443	1.45	995
25	PANCAKE	STRABANE	WASHINGTON	319	8		421,902	420	(48)	1,323	1.32	1,005
26	NORTH UNION	FAN HOLLOW	UNIONTOWN	564	47		739,533	903	(38)	1,312	1.60	819
27	RICHEYVILLE	DEEMS	CHARLEROI	406	20		565,134	1,008	(33)	1,394	2.49	561
28	FRAZIER	WICKHAVEN	PLEASANT VALLEY	738	41		934,187	1,630	(25)	1,265	2.21	573
29	GALLATIN	GALLATIN	CHARLEROI	206	3		25,175	14	(24)	122	0.07	1,798
30	NORTH UNION	PHILLIPS	UNIONTOWN	1,425	49		1,851,125	4,246	(24)	1,299	2.98	436
31	RUTAN	WINDRIDGE	JEFFERSON	1,193	82		1,438,655	2,568	(20)	1,206	2.15	560
32	BETHELBORO	BUTE	UNIONTOWN	513	17		633,083	1,625	(19)	1,234	3.17	390
33	CALIFORNIA	MALDEN	CHARLEROI	1,077	100		1,169,894	4,999	(13)	1,086	4.64	234
34	RUFF	RUFF CREEK	JEFFERSON	582	37		611,202	1,018	(11)	1,050	1.75	600
35	HOUSTON	MCGOVERN	WASHINGTON	1,742	93		1,900,534	3,610	(11)	1,091	2.07	526
36	LARDIN	GRAYS LANDING	UNIONTOWN	1,042	40		772,837	1,847	17	742	1.77	418
37	FOWLER	BALD EAGLE	STATE COLLEGE	411	36		237,290	1,765	24	577	4.29	134
38	THOMPSON FARM	COLLEGE HEIGHTS	STATE COLLEGE	1,721	41		735,738	2,707	46	428	1.57	272
39	SCOTIA	VALLEY VISTA	STATE COLLEGE	1,566	20		27,475	268	91	18	0.17	103
40	SCOTIA	SCHOOL	STATE COLLEGE	1,036	9		16,500	272	93	16	0.26	61
41	MT. RIANSARES TOWER	MT. RIANSARES	STATE COLLEGE	0	0		-	-	100	-	-	-

ATTACHMENT B

Worst Performing Circuits – Remedial Action

Blank Page

West Penn Power			
Rank	Substation	Circuit	Remedial Action Planned or Taken
1	Merrittstown	Brier Hills	Performance was driven by the August 4-7th non-excludable storm event. (99% of CMI)
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
2	Merrittstown	Republic	Performance was driven by the August 4-7th non-excludable storm event. (84% of CMI)
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
3	West Finley	West Finley	Performance was driven by the August 4-7th non-excludable storm event. (66% of CMI)
			Tree trimming planned for 2012.
			Completed outage cause review
4	Vestaburg Distribution	Mexico	Performance was driven by the August 4-7th non-excludable storm event. (88% of CMI)
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
5	Footedale	Footedale	Performance was driven by the August 4-7th non-excludable storm event (91% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
6	Lagonda	Prosperity	Performance was driven by the August 4-7th non-excludable storm event (80% of CMI).
			Relocate mainline project planned
			Circuit outage maps were created including a review of outage causes.
7	Maxwell	Maxwell	Performance was driven by the August 4-7th non-excludable storm event (97% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
8	Merrittstown	Merrittstown	Performance was driven by the August 4-7th non-excludable storm event (93% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
9	Waterville	Waterville	Performance was driven by foreign utility caused lockouts (67% of CMI).
			CAIDI improvement program to isolate points and fault indicators added
			Tree trimming performed in 2009-2010
10	Marianna	Marianna	Performance was driven by the August 4-7th non-excludable storm event (91% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.

West Penn Power			
Rank	Substation	Circuit	Remedial Action Planned or Taken
11	Marianna	Ten Mile	Performance was driven by the August 4-7th non-excludable storm event (92% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
12	Amity	Amity	Performance was driven by the August 4-7th non-excludable storm event (82% of CMI).
			Circuit review will be performed. Analysis will include circuit outage maps using historical outage information, evaluating outage causes and locations
13	Vestaburg Distribution	Low Hill	Performance was driven by the August 4-7th non-excludable storm event (70% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
14	Jourdan	Commercial #1	Performance was driven by the August 4-7th non-excludable storm event (76% of CMI).
			Circuit conversion planned from 4kV to 12kV
			Station reclosers to be added and coordination is planned
15	Long Farm Shaft	Long Farm Shaft	Performance was driven by the August 4-7th non-excludable storm event (94% of CMI).
			Circuit review will be performed. Analysis will include circuit outage maps using historical outage information, evaluating outage causes and locations
16	Vanceville	Vanceville	Performance was driven by the August 4-7th non-excludable storm event (92% of CMI).
			Cycle tree trimming to be completed in 2012
			Circuit outage maps were created including a review of outage causes.
17	North Union	Oliver	Performance was driven by the August 4-7th non-excludable storm event (74% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Tree trimming planned for 2012.
18	East Millsboro	East Millsboro	Performance was driven by lightning during the August 4 non-excludable storm (96% CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
19	Footedale	New Salem	Performance was driven by the August 4-7th non-excludable storm event (81% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
20	Lardin	McClellandtown	Performance was driven by the August 4-7th non-excludable storm event (96% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.

West Penn Power			
Rank	Substation	Circuit	Remedial Action Planned or Taken
21	Arensburg	Arensburg	Performance was driven by four incidents for the entire year, two of which contributed to 99% of CMI and one event caused by lightning at the substation.
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
22	Richeyville	Centerville	Performance was driven by the August 4-7th non-excludable storm event (72% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
23	Vestaburg Distribution	Fredericktown	Performance was driven by the August 4-7th non-excludable storm event (89% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
24	Pancake	Vance	Performance was driven by the August 4-7th non-excludable storm event (82% of CMI).
			2011 CAIDI Phase I project planned
			Monitor reliability outside of storm event.
25	Pancake	Strabane	Performance was driven by the August 4-7th non-excludable storm event (87% of CMI).
			Circuit review will be performed. Analysis will include circuit outage maps using historical outage information, evaluating outage causes and locations
			Tree trimming planned for 2011
26	North Union	Fan Hollow	Performance was driven by the August 4-7th non-excludable storm event (95% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
27	Richeyville	Deems	Performance was driven by the August 4-7th non-excludable storm event (77% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
28	Frazier	Wickhaven	Performance was driven by the August 4-7th non-excludable storm event (82% of CMI).
			Circuit review will be performed. Analysis will include circuit outage maps using historical outage information, evaluating outage causes and locations
			Monitor reliability outside of storm event.
29	Gallatin	Gallatin	Performance was driven by the August 4-7th non-excludable storm event (75% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
30	North Union	Phillips	Performance was driven by the August 4-7th non-excludable storm event (77% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.

West Penn Power			
Rank	Substation	Circuit	Remedial Action Planned or Taken
31	Rutan	Windridge	Performance was driven by the August 4-7th non-excludable storm event (85% of CMI).
			Project planned to install 25 - 12kV padmounts in the field near 25 over 12kV construction
			Line reclosers and regulators will also be installed
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
			Cycle tree trimming to be completed in 2013
32	Bethelboro	Bute	Performance was driven by the August 4-7th non-excludable storm event (97% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Monitor reliability outside of storm event.
33	California	Malden	Performance was driven by the August 4-7th non-excludable storm event (30% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Tree trimming planned for 2012.
34	Ruff	Ruff Creek	Performance was driven by the August 4-7th non-excludable storm event (61% of CMI).
			Circuit outage maps were created including a review of outage causes.
			Tree trimming completed in 2010.
35	Houston	McGovern	Performance was driven by the August 4-7th non-excludable storm event (80% of CMI).
			Circuit review will be performed. Analysis will include circuit outage maps using historical outage information, evaluating outage causes and locations
			Monitor reliability outside of storm event.
36	Lardin	Grays Landing	Performance was driven by the August 4-7th non-excludable storm event (50% of CMI).
			Circuit further analyzed and found an additional 45% of the total CMI occurred during the 12/9/09 snow storm
			Monitor reliability outside of storm event.
37	Fowler	Bald Eagle	Performance was driven by the August 4-7th non-excludable storm event (60% of CMI).
			Circuit review will be performed. Analysis will include circuit outage maps using historical outage information, evaluating outage causes and locations
			Tree trimming planned for 2012.

West Penn Power			
Rank	Substation	Circuit	Remedial Action Planned or Taken
38	Thompson Farm	College Heights	Performance was driven by weather and trees during a minor storm.
			Circuit review will be performed. Analysis will include circuit outage maps using historical outage information, evaluating outage causes and locations
			Tree trimming planned for 2011.
39	Scotia	Valley Vista	Performance was driven by weather and trees during a minor storm.
			Circuit review will be performed. Analysis will include circuit outage maps using historical outage information, evaluating outage causes and locations
			Monitor reliability outside of storm event.
40	Scotia	School	Performance was driven by weather and trees during a minor storm.
			Circuit review will be performed. Analysis will include circuit outage maps using historical outage information, evaluating outage causes and locations
			Tree trimming planned for 2012.
41	Mt. Riansares Tower	Mt. Riansares	Performance was driven by one incident caused by an off-right-of-way tree during a minor event.
			Circuit review will be performed. Analysis will include circuit outage maps using historical outage information, evaluating outage causes and locations
			Monitor reliability outside of storm event.

ATTACHMENT C

West Penn Power's Compliance with Terms of the July 20, 2006
Reliability Settlement Petition

Item	Description	Compliance Status
2a.	<p>Allegheny Power will make adjustments to its vegetation maintenance practices to reduce its rights-of-way clearing cycle to no longer than four years from [2005] through 2008 and will use the four-year cycle results to test the effectiveness of this approach.</p> <p>Allegheny Power reserves the right to change the cycle length after 2008 (after discussing with the parties) if another method with the cycle of more than four years appears more effective at managing its rights of way. Allegheny power will also make adjustments to its existing program to allow more focus on off-right-of-way danger trees.</p>	Commitment completed.
2b.	<p>Allegheny Power will maintain its 12-year inspection cycle for distribution and subtransmission wood poles and overhead facilities in a manner consistent with standard industry practices. These inspections will include visual inspections of the pole, the materials and equipment contained thereon from the ground line to the top of the pole, hammer soundings, borings, excavation and treatment of pole.</p> <p>In addition, Allegheny Power will commit to performing amid-cycle visual inspection of the pole and any material and equipment contained thereon, from the ground line to the pole top, incorporating reliability performance and performance of the materials and equipment into the prioritization of performing the mid-cycle inspections.</p>	Commitment implemented.
2c.	<p>Allegheny Power has committed to undertake a line workforce study that is to determine how many line workers should be hired to proactively prepare for anticipated retirements, to determine the optimal locations for line workers, to determine appropriate work shifts to reduce overtime, and to increase the effectiveness of its operations. Allegheny Power agrees to also study its substation workforce with the goal of estimating future staffing needs, preparing for anticipated retirements, determining the optimal locations and work shifts, and increasing the effectiveness of operations.</p> <p>The line and substation workforce study will be provide to the active parties and Allegheny Power will meet with them to discuss the results of the study.</p>	Commitment completed.
3.	<p>Allegheny Power will provide the Parties copies of all reliability-related reports filed with the PUC under 52 Pa. Code § 57.194(h)(l).</p> <p>In addition, as part of its quarterly reliability reports, Allegheny Power will include a section reporting on its compliance with the terms of this settlement.</p>	Commitment completed.
4a. 1-3	<p>Allegheny Power will meet semi-annually with PREA/AEC and local cooperative staff to address reliability and other issues. Meetings will include the following topics:</p> <ol style="list-style-type: none"> 1) Discussion of most recent outages at PREA/AEC delivery points 2) Identification and mutual agreement of Delivery Points that serve critical services/customers (identified as those which directly affect public safety) 3) Discussion of performance on the five "worst performing" Delivery Points, including outage details and determination if corrective action is warranted and development of any appropriate corrective action plan to be completed in a reasonable period of time. 	Commitment implemented.

ATTACHMENT D

Proposed Changes to Biennial Inspection, Maintenance, Repair and Replacement Plan^c

^c The proposed changes and revisions that West Penn Power requests herein only pertain to the Company's Distribution Pole Inspection Program

Section 57.198(l) EDC updates. An EDC may request approval from the Commission for revising its approved plan. An EDC shall submit to the Commission, as an addendum to its quarterly reliability report under §§ 57.193(c) and 57.195, prospective and past revisions to its plan and a discussion of the reasons for the revisions. Within 60 days, the Commission or the Director of CEEP will accept or reject the revisions to the plan. The appeal procedure in subsection (k) applies to the appeal of a rejection of revisions to the plan.

Request for Revision

Pursuant to Pennsylvania Code § 57.198(l), West Penn Power Company ("West Penn") hereby requests to modify its current distribution pole inspection program. Upon approval, West Penn intends to implement the distribution pole inspection program currently used by Pennsylvania Power Company ("Penn Power), Pennsylvania Electric Company ("Penelec") and Metropolitan Edison Company ("Met-Ed") and previously approved December 15, 2009. The reason for revision is to implement a consistent distribution pole inspection program across the four Pennsylvania companies. Please see the table below for a summary of the proposed changes. The proposed distribution pole inspection program follows beginning on page two.

Allegheny Power <i>(approved June 30, 2010)</i>	West Penn Power <i>(proposed program)</i>
Inspection of poles older than 15 years	Visual inspection on all poles
External / internal retreatment of poles during the applicable situation	Elimination of retreatment program
Categorization of reject poles into one of three categories (priority, reforeable and regular reject)	Conditions reasonably expected to endanger life or property repaired/replaced within 30 days. All remaining conditions are evaluated and prioritized on a case-by-case basis

Section 57.198(N)(2). Pole Inspections. *Distribution poles shall be inspected at least as often as every 10 – 12 years except for the new southern yellow pine creosoted utility poles which shall be initially inspected within 25 years, then within 12 years annually after the initial inspection. Pole inspections must include:*

- i. Drill tests at and below ground level*
- ii. A shell test*
- iii. Visual inspection for holes or evidence of insect infestation*
- iv. Visual inspection for evidence of unauthorized backfilling or excavation near the pole*
- v. Visual inspection for signs of lightning strikes*
- vi. A load calculation*

Program Description

West Penn shall visually inspect distribution wood poles on a twelve (12) year cycle. The purpose for inspecting distribution poles is to identify and repair unsafe conditions or conditions that may adversely affect service reliability or system performance, and to comply with the state regulatory agencies and the National Electrical Safety Code.

This preventative maintenance inspection for wood poles will include a visual inspection as well as hammer-sounding as needed. The inspection consists of the recording of abnormal conditions from the groundline to the top of the pole including but not limited to the following:

- Damage – broken or leaning
- Equipment – crossarms, insulators, conductors, oil leaking
- Testing for decayed internal wood

In addition to the visual inspection, poles showing incipient decay or poles that are thirty-five (35) years old or older will be bored to further assess the condition of the pole. This inspection consists of the recording of tests performed and abnormal conditions detected including but not limited to the following:

- Boring – testing for internal decay
- Verification of shell thickness

West Penn's Construction Standards are created based on NESC Heavy Loading (NESC C2-2007, Section 250) since the majority of FirstEnergy's service territory lies within this zone, and since these standards provide basic guidance for most designs encountered by distribution line design personnel. The Engineering Practices provide detailed guidance, for both guying and pole loading, to be used when designers encounter more complex design needs, again based on NESC Heavy Loading. Per the NESC, both of these resources include safety factors such that the deterioration of poles in service shall not reduce the strength capability of the pole below the required strength. Further, as the Company receives requests from other entities to attach their facilities to West Penn poles, an assessment of the pole's ability to accommodate the new strength requirement is performed.

For further detailed information regarding West Penn's inspection of wood poles, reference the Distribution Inspection & Maintenance Practice – Wood Poles located in the office of the President, Pennsylvania Operations.

Inspection Plan

	Area	Pole Inspections Planned	
		Number of Poles	
		2011	2012
West Penn Power 491,302 total poles	Arnold 42,498 total poles	5,444	4,862
	Boyce 12,411 total poles	823	1,918
	Butler 32,070 total poles	2,533	5,933
	Charleroi 43,828 total poles	4,721	4,465
	Clarion 11,539 total poles	2,001	2,396
	Hyndman 5,642 total poles	94	0
	Jeannette 34,808 total poles	3,663	1,685
	Jefferson 32,326 total poles	2,178	1,046
	Kittanning 20,266 total poles	1,083	1,916
	Latrobe 29,987 total poles	2,801	4,871
	McConnellsburg 18,223 total poles	2,280	1,060
	McDonald 15,830 total poles	1,656	281
	Pleasant Valley 28,874 total poles	5,616	2,015
	St. Marys 27,434 total poles	3,338	4,092
	State College 38,484 total poles	3,600	5,140
	Uniontown 34,931 total poles	3,854	3,065
Washington 32,276 total poles	4,218	2,106	
Waynesboro 29,875 total poles	2,492	2,320	

Section 57.198(N)(3). Inspection Failure. *If a pole fails the groundline inspection and shows dangerous conditions that are an immediate risk to public or employee safety or conditions affecting the integrity of the circuit, then the pole shall be replaced within 30 days of the date of inspection.*

Corrective Maintenance

Wood poles and supporting structures with recorded defects that West Penn could reasonably expect to endanger life or property shall be repaired/replaced within 30 days. All remaining deficiencies will be evaluated and prioritized on a case-by-case basis.

Section 57.198(C). Time frames. *The plan must comply with the inspection and maintenance standards set forth in subsection (N). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (N). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Justification

The practice of performing wood pole inspections on a twelve (12) year cycle is based on accepted electric utility practices. National Electrical Safety Code (NESC) Rule 12.121.A states "lines and equipment shall be inspected at such intervals as experience has shown to be necessary." A periodicity of twelve (12) years between inspections allows enough time for proper planning and remediation prior to any emergent problems having a negative impact on personal safety, equipment integrity or service reliability.

Regarding load calculation, not only will these additional calculations make the cost of pole inspections approximately three-times higher than they currently are, most poles in the West Penn service territory are very lightly loaded to the extent that the poles greatly exceed the strength requirements of NESC Table 253-2. As previously stated, performing a load calculation on poles that have been previously evaluated based on pole strength does not make economical or technical sense.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**1st Quarter 2011 Reliability Report – West :
Penn Power Company - Pursuant to 52 Pa. :
Code § 57.195(d) and (e)**

CERTIFICATE OF SERVICE

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

Service by overnight United Parcel Service, as follows:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
Office of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101
Scott J. Rubin, Esquire
Utility Workers Union of America
333 Oak Lane
Bloomsburg, PA 17815

Office of the Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

David J. Dulick
Pennsylvania Rural Electric Assn.
212 Locust Street, 2nd Floor
Harrisburg, PA 17101

RECEIVED

APR 29 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

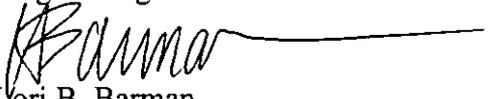
Service by electronic mail, as follows:

Darren Gill
Blaine Loper
Bureau of Conservation, Economics & Energy
Planning
Pennsylvania Public Utility Commission
dgill@state.pa.us
bloper@state.pa.us

Dan Searfoorce
Bureau of Fixed Utility Services
Pennsylvania Public Utility Commission
dsearfoorc@state.pa.us

Dated: April 29, 2011

Original Signed:

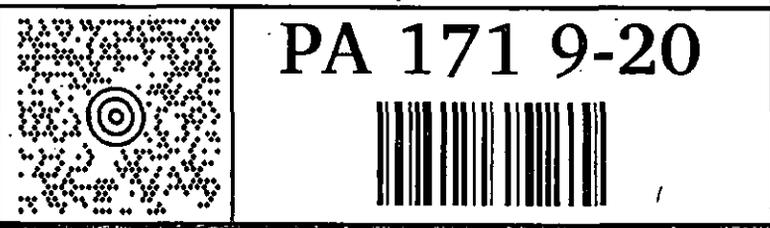

Lori B. Barman
FirstEnergy Service Company
76 S. Main Street
Akron, OH 44308
(330) 252-6380
lbarman@firstenergycorp.com

0217117171 AD 2
PUBLIC UTILITY
COMMITTEE
FL 2
004

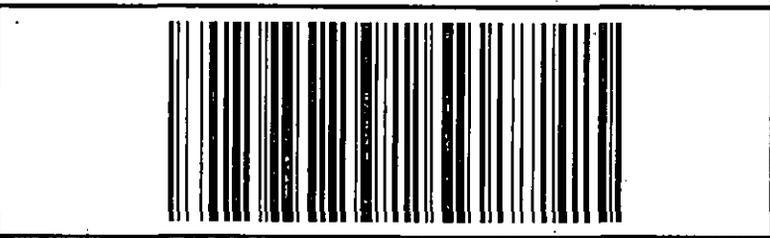
LORI B BARMAN
330-252-6380
FE SERVICE COMPANY
76 SOUTH MAIN
AKRON OH 44308

0.0 LBS LTR 1 OF 1

SHIP TO:
ROSEMARY CHIAVETTA, SECRETARY
7177727777
PENNSYLVANIA PUBLIC UTILITIES COMMI
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, 2ND FLOOR
HARRISBURG PA 17120



UPS NEXT DAY AIR **1**
TRACKING #: 1Z 475 886 01 9355 0705



BILLING: P/P

Trx Ref No.: 509119
Bill Lading: ARG00200097

NXL 11.01.24 NV45 15.0A 04/2011

TO: CHIAVETA, R. PUC (CHIAVETTA)
Agency: PUC
Floor:
External Carrier: UPS



Do not use this Express Pak for: UPS Ground

Apply s