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VIA OVERNIGHT MAIL

October 3, 2011

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**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

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

M-2009-2094773

RE: Biennial Inspection, Maintenance, Repair and Replacement Plan – Metropolitan Edison Company for the period January 1, 2013 – December 31, 2014

Dear Secretary Chiavetta:

In accordance with 52 Pa. Code § 57.198, enclosed for filing on behalf of Metropolitan Edison Company is an original and three (3) copies of its Biennial Inspection, Maintenance, Repair and Replacement Plan for the period January 1, 2013 – December 31, 2014.

This Plan is designed consistent with the guidelines established by the National Electric Safety Code, the Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission Regulations, and the American National Standards Institute, Inc. The Plan also has been designed to reduce the risk of outages on Met-Ed's system and form the basis of its inspection and maintenance goals and objectives as outlined in Met-Ed's annual and quarterly reliability reports filed with this Commission.

Metropolitan Edison Company respectfully requests that the Pennsylvania Public Utility Commission accept its Biennial Inspection, Maintenance, Repair and Replacement Plan. If you have any questions, please contact me or Eric Dickson at (330) 384-5970.

Sincerely,

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

**Biennial Inspection, Maintenance, Repair and Replacement Plan  
of Metropolitan Edison Company (“Met-Ed”)**

**For the period of January 1, 2013 – December 31, 2014**

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**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

**Submitted by:  
Douglas S. Elliott  
President, Pennsylvania Operations  
2800 Pottsville Pike  
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Email: [elliottd@firstenergycorp.com](mailto:elliottd@firstenergycorp.com)**

**Dated: October 3, 2011**

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Revisions to Approved Plan

The Commission accepted Metropolitan Edison Company's ("Met-Ed") current Biennial Inspection, Maintenance, Repair and Replacement Plan ("I&M Plan") for 2011 and 2012 on December 15, 2009. The table below illustrates, in summary fashion, the proposed changes to the 2013 and 2014 plan that differ from the 2011-2012 I&M Plan.

<b>Met-Ed</b> <i>2011-2012 Plan</i>	<b>Met-Ed</b> <i>Proposed Program (effective January 1, 2013)</i>
<b>Distribution Overhead Line Inspections</b>	
Visual inspection on a 5-year cycle	Visual inspection on a 6-year cycle
<b>Distribution Transformer Inspections</b>	
Overhead transformers – inspect as part of overhead line inspection (5-year cycle)  Above-ground transformers – inspect on a 5-year cycle	Overhead transformers – inspect as part of overhead line inspection (6-year cycle)  Above-ground transformers – inspect on 6-year cycle (to align with overhead transformer and line inspections)
<b>Substation Inspections</b>	
Inspect all substations 12 times annually	Inspections will consist of three components: 1. Monthly Safety & Security Inspection 2. Quarterly Safety and Security Inspection with Readings 3. Biannual Safety and Security Inspection with Full Inspection

In addition, pursuant to 52 Pa. Code § 57.198(l), Met-Ed will be submitting a request as an addendum to its quarterly reliability report that will be filed on November 1, 2011 to modify the programs as set forth above with an effective date of January 1, 2012. The addendum will contain a discussion of the reasons for the revisions to its existing approved plan. Therefore, the changes being proposed to the 2011 - 2012 plan will be consistent with those modifications being proposed in the 2013-2014 plan submitted herein.

**Section 57.198(n)(1). Vegetation Management.** *The statewide minimum inspection and treatment cycle for vegetation management is between 4-8 years for distribution facilities. An EDC shall submit a condition-based plan for vegetation management for its distribution system facilities explaining its treatment cycle.*

Program Description

Met-Ed performs vegetation management to help ensure the continued safe and reliable operation of the distribution system. The Standard Specification for vegetation management is designed to support line reliability, maintain access, make repairs, or restore service and to support safe and reliable service. The Standard vegetation specification provides vegetation to be pruned to achieve four (4) years of clearance, removal of selected incompatible trees within the clearing zone corridor, removal of certain defective limbs that are overhanging primary conductors, controlling selected incompatible brush mechanically and/or using herbicide, and removal of off-corridor priority trees that are dead, dying, diseased, and leaning or significantly encroaching the corridor.

Portions of a circuit that experience high customer interruption minutes due to vegetation-caused outages may be targeted to receive the Standard Specification as well as enhanced vegetation removal techniques, which includes removal of certain healthy limbs, based on tree species and condition, which overhang primary conductors.

For portions of a circuit that have not experienced significant reliability issues due to vegetation-caused outages, a proactive Inspect/Maintain process will target selective vegetation removal for continued reliable system operation. This may include the extension of a cycle which will not exceed eight (8) years. This process involves inspection of the vegetation to evaluate the extent of potential for vegetation to interfere with energized conductors. Factors to consider in the evaluation are the voltage and height of the conductor, the type of tree, its growth rate and branching habit. Trees that will impact safety or reliability will be maintained to the Standard Specification.

Methods used to manage and control vegetation include manual control methods using hand-operated tools, mechanical control using equipment mounted saws, mowers or other devices, and various herbicide application techniques such as, selective basal herbicide applications, stem foliage applications and cut stubble applications.

Further detailed information regarding Met-Ed's vegetation management program may be found in FirstEnergy's Vegetation Management Program Description.

Inspection Plan

	Area	Overhead Line Inspections Planned Number of Circuits	
		2013	2014
Met-Ed	Boyertown	50	25
	Hanover	313	584
	York	588	486
	Lebanon	466	378
	Easton/Stroudsburg	603	594
	Reading	791	627

**Section 57.198(c). Time frames.** The plan must comply with the inspection and maintenance standards 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

Distribution vegetation management activities are performed in accordance with the following:

- Generally accepted industry practices
- All routine vegetation clearing work is performed in compliance with ANSI Z133.1 and A-300 Standards and according to the requirements given by OSHA and the National Electrical Safety Code (NESC)

**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**

Met-Ed shall visually inspect distribution wood poles on a twelve (12) year cycle. The purpose for inspecting distribution wood 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

Further detailed information regarding Met-Ed's inspection of wood poles may be found in the Distribution Inspection & Maintenance Practice – Wood Poles.

Inspection Plan

	Area	Pole Inspections Planned Number of Poles	
		2013	2014
<b>Met-Ed</b> 341,486 total poles	Boyertown 21,939 total poles	1,828	1,828
	Hanover 60,248 total poles	5,020	5,020
	York 70,689 total poles	5,890	5,890
	Lebanon 45,380 total poles	3,781	3,781
	Easton 42,145 total poles	3,512	3,512
	Stroudsburg 37,396 total poles	3,116	3,116
	Reading 63,689 total poles	5,307	5,307

**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 Met-Ed could expect to create an immediate risk to public or employee safety or affect the integrity of the circuit shall be repaired/replaced within 30 days. All remaining deficiencies will be 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.

**Section 57.198(n)(4). Distribution overhead line inspections.** Distribution lines shall be inspected by ground patrol a minimum of once every 1 – 2 years. A visual inspection must include checking for:

- i. Broken insulators
- ii. Conditions that may adversely affect operation of the overhead distribution line
- iii. Other conditions that may adversely affect operation of the overhead distribution line

Program Description

Met-Ed shall visually inspect overhead lines and equipment on a six-year cycle. The purpose for inspecting overhead lines and equipment is to identify and repair unsafe conditions or conditions that may adversely affect service reliability, and to comply with the state regulatory agencies and the National Electrical Safety Code. This program shall be limited to overhead facilities.

Approximately one-sixth of all circuits will be inspected annually to levelize labor commitments and expenses. This preventative maintenance will consist of a visual inspection and recording of abnormal conditions including but not limited to the following types of overhead circuit equipment:

- Conductors (wire and cable) – excessive slack, condition, damage, clearances
- Supporting structures (wood poles) – deteriorated condition, sustained damage (lightning, vehicle, woodpecker holes)
- Pole hardware (including insulators) – condition, damage
- Guying – condition, damage
- Pole-mounted distribution equipment (including overhead transformers) – condition, damage

Further detailed information regarding Met-Ed’s inspection of Distribution Overhead Lines may be found in the Distribution Inspection & Maintenance Practice.

Inspection Plan

Area	Overhead Line Inspections Planned	
	Number of Circuits	
	2013	2014
Boyertown 37 total circuits	4	7
Hanover 111 total circuits	24	20
York 199 total circuits	34	33
Lebanon 96 total circuits	13	20
Easton 105 total circuits	22	12
Stroudsburg 32 total circuits	0	12
Reading 163 total circuits	30	21

**Section 57.198(n)(5). Inspection Failure.** *If critical maintenance problems are found that affect the integrity of the circuits, they shall be repaired or replaced no later than 30 days from discovery.*

Corrective Maintenance

Supporting structures with recorded defects that Met-Ed could reasonably expect to affect the integrity of the circuit shall be repaired/replaced within 30 days. All remaining deficiencies will be prioritized on a case-by-case basis.

**Section 57.198(c). Time frames.** *The plan must comply with the inspection and maintenance standards 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 overhead line inspections on a six-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 six (6) years between inspections has historically been utilized by West Penn Power Company and has proven to be successful in addressing emergent problems in a timely manner, allowing for proper planning and remediation prior to the emergent problem having a negative impact on personal safety, equipment integrity or service reliability. In addition to the cost analysis that Met-Ed has completed, this experience does not justify the expense of an increased cycle.

In addition to an inspection every six years, Met-Ed has a unique opportunities that allows Company personnel to view the overhead line facilities and identify any potential issues. Met-Ed's overhead line inspection program coincides with other equipment inspections, such as the annual recloser inspections. In order to address specific reliability concerns and to assess some worst performing circuit performance, additional circuit assessments are performed in addition to Met-Ed's six-year inspection program. Any emergent priority overhead line problems identified during these other inspections are addressed in a timely manner.

The periodicity in the aforementioned practice is a former Allegheny Energy practice that is being adopted by Met-Ed as a result of the merger between FirstEnergy and Allegheny Energy.

**Section 57.198(n)(6). Distribution transformer inspections.** *Overhead distribution transformers shall be visually inspected as part of the distribution line inspection every 1 – 2 years. Above-ground pad-mounted transformers shall be inspected at least as often as every 5 years and below-ground transformers shall be inspected at least as often as every 8 years. An inspection must include checking for:*

- i. Rust, dents or other evidence of contact*
- ii. Leaking oil*
- iii. Installation of fences or shrubbery that could adversely affect access to and operation of the transformer*
- iv. Unauthorized excavation or changes in grade near the transformer*

**Program Description**

Met-Ed visually inspects overhead distribution transformers as part of the overhead line inspection. Above-ground pad-mounted transformers are inspected on a six-year cycle and below-ground transformers are inspected on an eight-year cycle. The purpose for inspecting distribution transformers is to identify and repair unsafe conditions or conditions that may adversely affect service reliability, and to comply with the state regulatory agencies and the National Electrical Safety Code.

Overhead distribution transformers – visual inspection and recording of abnormal conditions including but not limited to the following:

- Equipment condition – oil leakage, arresters, rust, dents or evidence of contact

Above-ground pad-mounted equipment (transformers and switchgear) – inspection and recording of abnormal conditions including but not limited to the following:

- Equipment condition – oil leakage, cabinet damage, holes, washout
- Security – locking mechanisms
- Accessibility – as required for operation and maintenance purposes, including installation of fences or shrubbery that could adversely affect access to and operation of the transformer and unauthorized excavation or changes in grade near the transformer
- Warning labels – electrical hazard warning label and landscaping instructions notice

Below-ground transformers – visual inspection and recording of abnormal conditions including but not limited to the following:

- Accessibility – verify cover is secured
- Equipment condition – visually inspect baffle

Further detailed information regarding Met-Ed's inspection of distribution transformers may be found in the Distribution Inspection & Maintenance Practice – Underground Equipment.

Inspection Plan

Area	Type (Total Number of Transformers)	Transformer Inspections Planned Total transformers	
		2013	2014
Hanover	Overhead Transformers 26,238	5,348	7,637
	Above-Ground Pad-mounted 8,061	1,755	1,995
	Below-Ground Transformers 124	25	27
Boyertown	Overhead Transformers 11,453	2,129	3,438
	Above-Ground Pad-mounted 3,747	666	1,478
	Below-Ground Transformers 52	15	17
York	Overhead Transformers 30,803	8,991	6,578
	Above-Ground Pad-mounted 12,428	2,610	4,112
	Below-Ground Transformers 174	45	32
Lebanon	Overhead Transformers 16,438	4,435	3,231
	Above-Ground Pad-mounted 5,307	1,045	1,675
	Below-Ground Transformers 235	52	88
Easton	Overhead Transformers 14,177	3,033	3,223
	Above-Ground Pad-mounted 3,621	677	743
	Below-Ground Transformers 160	28	5
Stroudsburg	Overhead Transformers 11,960	1,360	3,990
	Above-Ground Pad-mounted 1,948	427	606
	Below-Ground Transformers 26	1	5
Reading	Overhead Transformers 26,572	6,712	2,589
	Above-Ground Pad-mounted 7,854	2,310	1,035
	Below-Ground Transformers 235	68	20

**Section 57.198(c). Time frames.** *The plan must comply with the inspection and maintenance standards 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 distribution overhead transformer inspections as well as above-ground transformer inspections on a six-year cycle and below-ground transformers on an eight-year cycle is based on accepted electric utility practices and the experience of Met-Ed. 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."

The aforementioned periodicity between inspections allows distribution overhead and above-ground transformers to be inspected in conjunction with the overhead circuit inspection which is on a 6-year cycle as well. The above periodicities between inspections have proven to be successful in addressing emergent problems in a timely manner, allowing for proper planning and remediation prior to the emergent problem having a negative impact on personal safety, equipment integrity or service reliability.

**Section 57.198(n)(7). Recloser inspections.** *Three-phase reclosers shall be inspected on a cycle of 8 years or less. Single-phase reclosers shall be inspected as part of the EDC's individual distribution line inspection plan.*

Program Description

Met-Ed visually inspects distribution line reclosers annually. The purpose for inspecting distribution line reclosers 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.

The annual preventative maintenance consists of counter readings and the field inspection. The counter readings are obtained to assess system performance based on the number of operations. The field inspection includes but is not limited to the following:

- Type of recloser and current rating
- Counter reading
- Condition – rust, dents, physical damage, leaks, lightning damage
- Equipment – surge arresters, tank-ground connections, by-pass switches, control battery, pole
- Grounds – damage, condition

Further detailed information regarding Met-Ed's inspection of reclosers may be found in the Distribution Inspection & Maintenance Practice – Line Reclosers.

Inspection Plan

Area	Type	Recloser Inspections Planned Total Number of Reclosers	
		2013	2014
Boyertown 54 total reclosers	Single Phase 21 total reclosers	21	21
	Three Phase 33 total reclosers	33	33
Hanover 215 total reclosers	Single Phase 82 total reclosers	82	82
	Three Phase 133 total reclosers	133	133
York 198 total reclosers	Single Phase 67 total reclosers	67	67
	Three Phase 131 total reclosers	131	131
Lebanon 169 total reclosers	Single Phase 81 total reclosers	81	81
	Three Phase 88 total reclosers	88	88
Easton 76 total reclosers	Single Phase 11 total reclosers	11	11
	Three Phase 65 total reclosers	65	65
Stroudsburg 70 total reclosers	Single Phase 2 total reclosers	2	2
	Three Phase 68 total reclosers	68	68
Reading 169 total reclosers	Single Phase 81 total reclosers	81	81
	Three Phase 88 total reclosers	88	88

**Section 57.198(c). Time frames.** The plan must comply with the inspection and maintenance standards 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 annual recloser inspections is based on accepted electric utility practices and the experience of Met-Ed. 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 one year between inspections has proven to be successful in addressing emergent problems in a timely manner, allowing for proper planning and remediation prior to the emergent problem having a negative impact on personal safety, equipment integrity or service reliability.

**Section 57.198(n)(8). Substation inspections.** *Substation equipment, structures and hardware shall be inspected on a cycle of 5 weeks or less.*

Program Description

Met-Ed's substation inspection program is composed of three components. The purpose of these inspections of the distribution substations is to verify the security of the substation, capture readings and to ensure that any developing substation problems are identified and addressed in a timely manner in support of system reliability and electrical safety.

These three components include:

1. Safety and Security Inspection (Class C) – monthly inspection and recording of abnormal conditions including but not limited to the following:
  - Substation control house (security breaches, roof integrity, fire protection equipment, general housekeeping)
  - Substation yard and perimeter (gate, fence, signage)
2. Safety and Security Inspection with Readings (Class B) – quarterly inspection and recording of abnormal conditions including but not limited to the following types of substation equipment:
  - Substation control house (security breaches, roof integrity, fire protection equipment, general housekeeping)
  - Substation yard and perimeter (gate, fence, signage)
  - Read and record currents, voltages, temperatures, pressures and operations counters on installed substation equipment
3. Safety and Security Inspection with Full Inspection (Class A) – a biannual visual inspection along with readings and a more comprehensive inspection and testing of the substation and including but not limited to the following types of substation equipment:
  - Substation control house (security breaches, roof integrity, fire protection equipment, general housekeeping)
  - Substation yard and perimeter (gate, fence, signage)
  - Read and record currents, voltages, temperatures, pressures and operations counters on installed substation equipment
  - Microwave/radio sites and engine generators, batteries and chargers
  - Relaying, power transformers, breakers, voltage regulators, capacitor banks, etc.

Further detailed information regarding Met-Ed's inspection of substations may be found in the Substation Practice Manual.

Inspection Plan

	Area	Substation Inspections Planned	
		2013	2014
	York 76 substations	912	912
	Lebanon 33 substations	396	396
	Easton 47 substations	564	564
	Reading 63 substations	756	756

**Section 57.198(c). Time frames.** *The plan must comply with the inspection and maintenance standards 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 substation inspections is based on accepted utility practices and the experience of Met-Ed. Providing a trained, physical presence within the substation on a regular, periodic basis has proven very successful in detecting the degradation of facilities not always captured by existing local and remote surveillance and monitoring tools. A periodicity of one month between inspections has proven to be successful in addressing emergent problems in a timely manner, allowing for proper planning and remediation prior to the emergent problem having a negative impact on person safety, equipment integrity or service reliability.

This practice is a former Allegheny Energy practice that is being adopted by Met-Ed as a result of the merger between FirstEnergy and Allegheny Energy.

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

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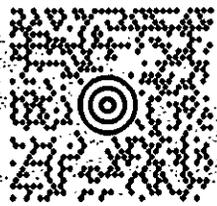
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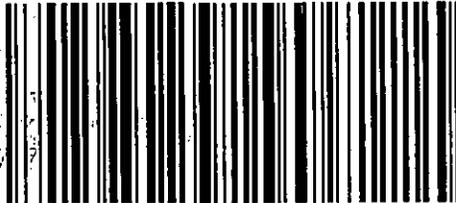
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