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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

November 2, 2011

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

RE: Biennial Inspection, Maintenance, Repair and Replacement Plan – West Penn Power Company for the period January 1, 2013 – December 31, 2014; Docket No. M-2009-2094773

Dear Secretary Chiavetta:

On October 3, 2011, West Penn Power Company ("West Penn Power") filed its Biennial Inspection, Maintenance, Repair and Replacement Plan ("the Plan") for the period of January 1, 2013 – December 31, 2014 with the Commission in accordance with 52 Pa. Code § 57.198. In the Justification portion of the Vegetation Management section (Section 57.198(n)(1)) at page three of the Plan, West Penn Power stated that within 30 days it would provide additional information and support for the proposed change to a five-year cycle in a supplemental submission. Enclosed herewith please find an original and three copies of this letter which provides additional information and support for West Penn Power's proposed change to a five-year vegetation management cycle.

West Penn Power intends to implement the Vegetation Management program methods (excluding the cycle) currently used by Pennsylvania Power Company ("Penn Power"), Pennsylvania Electric Company ("Penelec") and Metropolitan Edison Company ("Met-Ed") on a five-year cycle. West Penn Power's new Vegetation Management program will be completing 100% of the entire service territory within a five-year cycle compared to the present plan which completes the entire service territory within an eight-year cycle. As shown later in this filing West Penn Power will prioritize the first zone of trimming, which is from the substation to the first protection device. Also, West Penn Power will be implementing a heavier trim practice with more ground to sky trimming and remove of danger trees, The funding of the West Penn Power's Forestry Management program has increased significantly, as shown later in this filing, with over a 200% increase in funding from 2010 to 2011. We plan to commit to an increased level of spending over the next several years that will improve the reliability of the West Penn Power electrical system.

Historically, West Penn Power's vegetation management program was a condition-based assessment of tree trimming needs. The extent of the vegetation work performed on a given section of a circuit was determined by the reliability impact of that section of line. Urban circuits (areas

within cities, towns and boroughs) had vegetation work performed on a four-year cycle to maintain reliability in heavily populated areas and to reduce adverse impact of excessive trimming in these areas. Rural circuits (non-urban) were trimmed on an eight-year cycle and prioritized based on Customer Minutes of Interruption (CMI), the number of customers on the circuit, and the amount of time since the circuit was last trimmed.

The following table shows the West Penn Power mileage that would be trimmed each year based on the currently-approved program. As shown in the table, under the current program, it would take eight years for West Penn Power to conduct vegetation management on 100% of its circuits.

		Currently Approved Program (4-year urban + 8-year rural)					
		Urban		Rural		Total	
Cycle	Year	Cumulative	% of Total	Cumulative	% of Total	Cumulative	% of Total
1	2012	1,051	25%	1,950	13%	3,000	15%
2	2013	2,101	50%	3,900	25%	6,001	30%
3	2014	3,152	75%	5,849	38%	9,001	45%
4	2015	4,202	100%	7,799	50%	12,001	61%
5	2016	5,253	125%	9,749	63%	15,001	76%
6	2017	6,303	150%	11,699	75%	18,002	91%
7	2018	7,354	175%	13,648	88%	21,002	106%
8	2019	8,404	200%	15,598	100%	24,002	121%
Total System Miles		4,202		15,598		19,800	

Pursuant to the proposed Plan, West Penn Power’s revised vegetation management program will allow for prioritization of the first zone of trimming, which is from the substation to the first protective device. The table below shows the West Penn Power mileage that would be trimmed each year under the proposed five-year program. Under this plan, as shown in the following table, West Penn Power plans to complete 100% of the Zone 1 trim area within the first three years. Under the revised program, 100% of all miles will be trimmed within five years.

Proposed 5-Year Cycle					
		Zone 1 (Substation to first protective device)		Total	
Cycle Year	Year	Cumulative Cycle Miles	% of Total	Cumulative Cycle Miles	% of Total
1	2012	678	49%	4,360	22%
2	2013	1,155	83%	8,520	43%
3	2014	1,433	103%	12,480	63%
4	2015	1,710	123%	16,440	83%
5	2016	1,988	143%	20,400	103%
Total System Miles		1,388		19,800	

Finally, as highlighted below and as part of the proposed change to its vegetation management program, West Penn Power estimates spending approximately \$25.3 million on its vegetation management program in 2012. This is an increase of approximately \$4 million over the 2011 projected spend and an increase of \$18.2 million over the 2010 actual vegetation management spend. The investment in West Penn Power's vegetation management program is expected to be maintained at a consistent level for the next five years.

Year	Vegetation Management Annual Trim Program
2012 Projected	\$25,372,758.00
2011 Estimate	\$21,325,410.00
2010 Actual	\$7,113,207.00
2009 Actual	\$5,429,865.00
2008 Actual	\$6,708,940.67
2007 Actual	\$4,976,665.19

West Penn Power appreciates the opportunity to supplement its initial submission. 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

c: D. Gill, Bureau of Technical Utility Services

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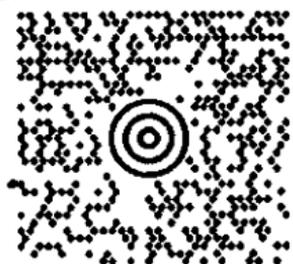
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A, R. PUC (CHIAVETTA)