



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

August 1, 2012

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

Re: 2nd Quarter 2012 Reliability Report – West Penn Power Company - Pursuant to
52 Pa. Code § 57.195(d) and (e)

Dear Secretary Chiavetta:

Enclosed for electronic filing on behalf of West Penn Power Company (“Company”) is its 2nd Quarter 2012 Reliability Report (“Report”) pursuant to 52 Pa. Code § 57.195(d) and (e). A copy of this Report is also being copied to the Office of Consumer Advocate and the Office of Small Business Advocate.

Please feel free to contact me if you have any questions or need additional information regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Elliott", with a long horizontal flourish extending to the right.

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



2012 2nd Quarter Reliability Report

West Penn Power Company

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

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2nd Quarter 2012 Reliability Report - West Penn Power Company

The following 2nd Quarter 2012 Reliability Report is filed on behalf of West Penn Power Company (“West Penn Power”) for the period ending June 30, 2012.

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 experience a major event as defined by the major event exclusion requirements established by Commission Order in Docket No. M-00991220. This event began on June 29 and extended into July. As the event did not conclude until the third quarter, West Penn Power plans to submit a major event exclusion request during the third quarter and, if granted, it will be reflected in the third quarter report.

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

2Q 2012 (12-Mo Rolling)	West Penn Power		
	Benchmark	12-Month Standard	12-Month Actual
SAIFI	1.05	1.26	1.19
CAIDI	170	204	198
SAIDI	179	257	234
Customers Served ¹	705,881		
Number of Sustained Interruptions	10,790		
Customers Affected	837,683		
Customer Minutes	165,452,170		

¹ 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

The methodology used to identify worst performing circuits is based on both System Average Interruption Frequency Index (“SAIFI”) and System Average Interruption Duration Index (“SAIDI”). The methodology consists of the following steps:

1. For each circuit calculate a circuit SAIFI using only distribution-caused outages.
2. Select the worst 20% of circuits based on the highest circuit SAIFI.
3. Rank the selected circuits based on SAIDI using only distribution-caused customer minutes.
4. Select 5% of the circuits based on the highest customer minutes. These circuits are then identified as the worst performing circuits.

West Penn Power’s ranking of the 5% Worst Performing Circuits are provided in Attachment A to 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 to 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				
2nd Quarter 2012 12-Month Rolling	West Penn Power			
Cause	Customer Minutes	Number of Sustained Interruptions	Customers Affected	% Based on Number of Outages
EQUIPMENT FAILURE	23,426,145	2,639	159,316	24.46%
TREES/NOT PREVENTABLE	67,867,603	2,439	205,085	22.60%
UNKNOWN	19,454,584	1,670	94,016	15.48%
ANIMAL	1,939,120	1,046	23,056	9.69%
LINE FAILURE	8,013,814	658	64,209	6.10%
LIGHTNING	7,534,731	561	50,868	5.20%
TREES/PREVENTABLE	7,191,754	559	44,092	5.18%
VEHICLE	9,204,047	373	89,553	3.46%
WIND	15,143,199	290	38,017	2.69%
FORCED OUTAGE	1,818,602	218	29,512	2.02%
HUMAN ERROR -NON-COMPANY	1,199,071	81	11,993	0.75%
BIRD	118,940	53	1,249	0.49%
OBJECT CONTACT WITH LINE	522,031	46	4,325	0.43%
OVERLOAD	767,476	43	5,534	0.40%
UG DIG-UP	121,945	33	1,217	0.31%
FIRE	819,548	27	7,810	0.25%
CUSTOMER EQUIPMENT	16,035	21	59	0.19%
HUMAN ERROR - COMPANY	66,715	14	3,199	0.13%
VANDALISM	72,860	9	961	0.08%
PREVIOUS LIGHTNING	7,699	4	41	0.04%
SWITCHING ERROR	142,550	3	3,566	0.03%
OTHER UTILITY-NON ELEC	1,908	2	4	0.02%
ICE	1,793	1	1	0.01%
TOTAL	165,452,170	10,790	837,683	100.00%

Proposed Solutions – West Penn Power

Equipment Failure

West Penn Power maintains a Reliability Improvement Program (“RIP”) to help address poor performing distribution circuits. Many of the Ensure Reliability Service (“ERS”) programs, such as 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 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 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.

Trees/Not Preventable

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 or the integrity of the line under any weather condition. West Penn Power also began targeting live, healthy trees that pose a threat to service reliability or integrity of the line by uprooting, breaking, or otherwise falling into the line.

Unknown

There are numerous events, which are typically transient in nature, that result in outages with the cause Unknown. Procedures are in place for field personnel to investigate recurring outages on a specific sectionalizing device. Experience has shown that very few of the outage events classified as Unknown are recurrent in nature. West Penn Power has also introduced a root cause analysis process for all circuit lockouts that includes field patrols of all questionable outage causes.

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 2012		West Penn Power		
		Planned	Completed	
		Annual	2Q	YTD
Forestry	Transmission (Miles)	318.10	22.19	28.36
	Distribution (Miles)	4,533	1,139	2,390
Transmission	Aerial Patrols	2	1	1
	Groundline	206	0	0
Substation	General Inspections	5,050	1,010	2,525
	Transformers	405	117	290
	Breakers	210	50	142
	Relay Schemes	140	47	105
Distribution	Capacitors	1,360	1,216	1,360
	Poles	42,180	3,866	42,582
	Reclosers	3,556	69	121
	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 Expenditures³

T&D O&M 2012						
Company	FERC	Q2 Actuals	Q2 Budget	Q2 YTD Actuals	Q2 YTD Budget	Annual Budget
West Penn Power	560 Operation Supervision and Engineering	-	-	(70,659)	(70,659)	(70,659)
	561 Load Dispatching	571,178	2,028,025	1,017,111	2,473,959	6,950,594
	562 Station Expenses	138,778	705,406	163,082	729,710	2,301,818
	563 Overhead Lines Expenses	(13,705)	-	89,074	102,779	102,779
	565 Transmission of Electricity by Others	7,981,445	131,409	13,897,561	6,047,525	17,730,188
	566 Miscellaneous Transmission Expenses	108,267	50,114	130,082	71,928	136,868
	567 Rents	220	3,806,702	220	3,806,702	-
	568 Maintenance Supervision and Engineering	177,495	313,398	294,244	430,147	1,088,963
	569 Maintenance of Structures	8,002	26,399	18,275	36,672	110,421
	570 Maintenance of Station Equipment	125,399	6,906	467,697	349,204	415,701
	571 Maintenance of Overhead Lines	1,716,672	1,225,340	2,002,961	1,511,629	3,627,269
	572 Maintenance of Underground Lines	575	-	575	-	-
	573 Maintenance of Miscellaneous Transmission Plant	-	-	-	-	-
	575 Market Administration, Monitoring & Compliance Sys	17,970	-	62,278	44,308	44,308
	580 Operation Supervision and Engineering	52,462	48,929	540,393	536,860	643,882
	581 Load Dispatching	660,221	553,109	1,190,417	1,083,304	2,279,657
	582 Station Expenses	507,169	215,598	548,216	256,645	733,217
	583 Overhead Line Expenses	219,138	144,633	324,987	250,482	575,123
	584 Underground Line Expenses	336,714	327,250	605,361	595,897	1,200,687
	586 Meter Expenses	113,784	74,748	311,348	272,312	581,429
	587 Customer Installations Expenses	-	-	108,604	108,604	108,604
	588 Miscellaneous Dx Expenses	3,813,384	2,077,661	4,820,093	3,084,369	6,887,560
	589 Rents	-	-	2,713	2,713	2,713
	590 Maintenance Supervision and Engineering	59,257	94,113	643,967	678,823	906,276
	591 Maintenance of Structures	-	-	-	-	-
	592 Maintenance of Station Equipment	586,778	916,890	1,661,230	1,991,343	4,319,496
	593 Maintenance of Overhead Lines	2,556,074	5,285,575	7,158,108	9,887,609	19,752,461
	594 Maintenance of Underground Lines	98,152	201,708	155,503	259,059	667,349
	595 Maint. Line Transformer	-	-	48,027	48,027	48,027
	596 Maintenance of Street Lighting and Signal Systems	155,458	103,495	214,617	162,654	396,513
597 Maintenance of Meters	83,052	352,679	305,174	574,801	1,362,485	
598 Maintenance of Miscellaneous Distribution Plant	97,685	152,245	268,372	322,932	745,851	
West Penn Power Total		20,171,624	18,842,331	36,979,629	35,650,337	73,549,580

³ Budgets are 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 Expenditures³

T&D Capital - 2012						
Company	Investment Reason	Q2 Actuals	Q2 Budget	Q2 YTD Actuals	Q2 YTD Budget	Annual Budget
West Penn Power	Capacity	(1,812,425)	2,894,900	(827,289)	3,880,037	4,154,480
	Condition	3,534,839	2,800,823	3,981,665	3,247,639	8,836,187
	Facilities	1,156,145	1,842,502	3,971,631	4,657,989	5,401,834
	Forced	5,134,865	8,413,486	9,817,283	13,095,903	30,209,021
	Meter Related	508,803	830,155	(52,868)	268,485	2,011,450
	New Business	3,994,520	4,558,557	8,012,364	8,576,401	17,244,298
	Other	7,456,826	(511,091)	7,973,748	5,831	(2,594,517)
	Reliability	324,860	2,358,198	1,914,733	3,948,071	10,509,227
	Street Light	43,638	498,789	199,710	654,861	1,636,205
	Tools & Equip	1,787,386	987,537	2,043,735	1,243,886	2,976,949
	Vegetation Mgt.	8,071,637	9,378,638	14,130,596	15,437,596	31,981,095
WestPenn Power Total		30,201,095	34,052,494	51,165,299	55,016,699	112,366,229
Grand Total		88,607,639	102,577,476	169,877,076	190,543,936	375,340,063

³ Budgets are 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 2012					
Department	Staff	1Q	2Q	3Q	4Q
Line	Leader / Chief	82	82		
	Lineman	170	175		
Substation	Leader	14	15		
	Electrician	46	48		
	Total	312	320		

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 2012 (\$)					
	1Q	2Q	3Q	4Q	Total
West Penn Power	1,483,675	3,348,987			4,832,662

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 - 2012	
	West Penn Power
January	38%
February	45%
March	29%
April	34%
May	31%
June	24%

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					
2012	Total Call-Outs	Workers Accepting	Elapsed Time (Minutes)	Average Response Time per Crew Call-Out (Minutes)	Average Response Rate Per Workers Accepting (Minutes)
April	1,470	1,088	4,484	4.72	4.12
May	1,039	832	3,852	5.36	4.63
June	1,135	865	4,968	6.57	5.74
2Q Total	3,644	2,785	13,304	3.65	4.78

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

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West Penn Power										
Circuit Rank	Substation	Circuit Desc	Average Customers	Outages	Customer Minutes	Customers Affected	SAIDI	CAIDI	SAIFI	
1	FAYETTEVILLE	BIKE ROAD	1,147	55	2,103,401	2,418	1,834	870	2.11	
2	NECESSITY	OHIOPILE	825	38	2,102,502	4,815	2,548	437	5.84	
3	LAGONDA	LAGONDA	1,400	44	1,966,378	3,138	1,405	627	2.24	
4	BLUE RIDGE SUMMIT	SABILLASVILLE	966	52	1,905,493	2,504	1,973	761	2.59	
5	FOUNTAINDALE	CARROLL VALLEY	1,208	42	1,766,862	2,459	1,463	719	2.04	
6	RUTAN	WINDRIDGE	1,210	52	1,717,079	3,539	1,419	485	2.92	
7	AMITY	AMITY	519	28	1,852,236	2,145	3,569	864	4.13	
8	LANTZ	MEADOW	661	10	1,630,818	1,567	2,467	1,041	2.37	
9	HOUSTON	MCGOVERN	1,750	33	1,613,799	4,448	922	363	2.54	
10	SILVERVILLE 138-12	HARRISON	1,182	39	1,595,169	6,930	1,350	230	5.86	
11	BETHLEN	DARLINGTON	1,213	74	1,512,800	3,603	1,247	420	2.97	
12	AMITY	BANETOWN	1,474	34	2,865,798	5,118	1,944	560	3.47	
13	RUTAN	BRISTORIA	1,197	61	1,402,689	3,313	1,172	423	2.77	
14	UPTON	HEISEY	560	14	1,258,775	1,214	2,248	1,037	2.17	
15	BETHLEN	WILPEN	1,363	67	1,178,324	2,711	865	435	1.99	
16	QUINCY	SOUTH MOUNTAIN	869	23	1,104,469	1,635	1,271	676	1.88	
17	SOUTH UNION	YORK RUN	1,473	26	1,084,899	2,418	737	449	1.64	
18	SEWICKLEY	HERMINIE	1,151	15	918,986	2,447	798	376	2.13	
19	BETHLEN	LAUGHLINTOWN	1,099	45	885,711	2,836	806	312	2.58	
20	VESTABURG	MEXICO	593	12	848,580	1,317	1,431	644	2.22	
21	SOUTH UNION	SOUTH UNIONTOWN	1,342	11	844,577	3,883	629	218	2.89	
22	GRAND POINT	SCOTLAND	731	15	774,182	1,295	1,059	598	1.77	
23	FAWN	BULL CREEK	863	24	765,094	5,031	887	152	5.83	
24	HENRY CLAY	MARKLEYSBURG	1,082	40	762,884	3,459	705	221	3.20	
25	HUNTINGDON	PENNA AVE	1,665	15	729,579	5,340	438	137	3.21	
26	MARIANNA	TEN MILE	352	31	722,235	1,647	2,052	439	4.68	
27	LARDIN	MCCLELLANDTOWN	562	15	697,940	1,576	1,242	443	2.80	
28	GREENSBORO	GREENSBORO	863	24	777,793	2,340	901	332	2.71	
29	VESTABURG	LOW HILL	702	20	679,826	1,251	968	543	1.78	
30	PETERS	VENETIA	1,866	21	672,851	6,845	361	98	3.67	
31	BUCKEYE NO.3	S MUDDY CREEK	963	22	654,638	2,919	680	224	3.03	

West Penn Power										
Circuit Rank	Substation	Circuit Desc	Average Customers	Outages	Customer Minutes	Customers Affected	SAIDI	CAIDI	SAIFI	
32	WASHINGTON	PARK	1,595	25	621,435	2,915	390	213	1.83	
33	WHITE VALLEY	CONGRUITY	1,743	34	620,141	3,595	358	173	2.06	
34	SALTSBURG	SALINA	859	39	616,942	1,988	718	310	2.31	
35	LAGONDA	CLUB FORTY	900	20	615,436	2,679	684	230	2.98	
36	MCDONALD	NOBLESTOWN	1,657	13	610,135	6,338	368	96	3.82	
37	SEWICKLEY	ADAMSBURG	1,495	19	610,036	7,587	408	80	5.07	
38	WEST FINLEY	WEST FINLEY	131	23	623,029	617	4,756	1,010	4.71	
39	SHAFFERS CORNER	SEVENTH ST RD	2,084	30	640,037	6,710	307	95	3.22	
40	MURRYCREST	SARDIS ROAD	1,473	29	605,716	5,301	411	114	3.60	
41	WATERVILLE	WATERVILLE	355	16	601,121	3,172	1,693	190	8.94	
42	LARDIN	GRAYS LANDING	1,049	25	589,248	2,058	562	286	1.96	

ATTACHMENT B

Worst Performing Circuits – Remedial Action

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West Penn Power			Remedial Actions Planned or Taken
Rank	Substation	Circuit	
1	FAYETTEVILLE	BIKLE ROAD	10/29/11 snow storm accounted for 72% of CMI (including one substation circuit lockout). Action Plan: Patrol 1.1 miles of circuit three-phase mainline to inspect hardware in this section. Review two taps on circuit which had same device operated three or more times to determine any further action needed.
2	NECESSITY	OHIOPYLE	87% of circuit CMI was due to trees. Circuit to be reviewed for main line hardware issues in 2012. Mainline tree trimming to be done in 2012.
3	LAGONDA	LAGONDA	This circuit was significantly affected by a June 29th 2012 Derecho storm. 49% of the CMI was due to trees and another 29% was due to wind. Cycle tree trimming scheduled for 2012.
4	BLUE RIDGE SUMMIT	SABILLASVILLE	Three storm events accounted for 66% of CMI (5/28/11 storm, 8/28/11 Hurricane Irene, 10/29/11 snow storm). Completed CAIDI project in 2010. Action Plan: Patrol circuit mainline to inspect for hardware issues. Review one tap on circuit which had same device operated three times to determine any further action needed. Continue to monitor circuit
5	FOUNTAINDALE	CARROLL VALLEY	38% of CMI was due to trees. A 10/29/11 snowstorm affected performance. This circuit is one of the circuits on the 2012 circuit inspection program and is being inspected now. Any hardware issues will be addressed by that program.
6	RUTAN	WINDRIDGE	70% of circuit CMI was due to trees and 20% due to unknown. The circuit was affected by the 6/29/12 Derecho event. Installed new substation and circuit to split Windridge circuit. Circuit to be reviewed for main line hardware issues in 2012.
7	AMITY	AMITY	This circuit was significantly affected by a June 29th 2012 Derecho storm. 21% of the CMI was due to trees and another 71% was due to wind. The circuit had Zone 1 danger tree work performed in 2011 and is scheduled for a 2012 hardware review.
8	LANTZ	MEADOW	36% of circuit CMI was due to trees and 58% due to unknown. The circuit was affected by the 6/29/12 Derecho event. Monitor performance outside of storm event.
9	HOUSTON	MCGOVERN	This circuit was significantly affected by a June 29th 2012 Derecho storm. 70% of the CMI was due to unknown causes and another 17% was due to trees. The circuit is scheduled for a 2012 hardware review.
10	SILVERVILLE 138-12	HARRISON	76% of circuit CMI was driven by both trees and unknown cause. Circuit to be reviewed for main line hardware issues in 2012. Mainline tree trimming to be done in 2012.
11	BETHLEN	DARLINGTON	89% of circuit CMI was driven by trees during spring storm events. Trees were trimmed in 2010. Zone 2 trimming planned for 2012.
12	AMITY	BANETOWN	This circuit was significantly affected by a June 29th 2012 Derecho storm. 72% of the CMI was due to tree causes and another 23% was due to unknown causes. The circuit is scheduled for a 2012 hardware review as well as circuit tree trimming.
13	RUTAN	BRISTORIA	61% of circuit CMI due to trees and 21% was due to wind. The circuit was affected by the 6/29/12 Derecho event. Mainline tree trimming completed in 2011. Circuit reviewed for main line hardware issues. Cycle tree trimming to be done in 2012.

West Penn Power			Remedial Actions Planned or Taken
Rank	Substation	Circuit	
14	UPTON	HEISEY	60% of circuit CMI was due to wind. A storm on 9/4/11 in which high winds toppled (7) mainline poles with both 12kV distribution and 34.5kV subtransmission on them causing a circuit lockout and had a very long repair duration due to the extensive damage. 36% of CMI was due to 10/29/11 snowstorm. Monitor performance outside of storm events.
15	BETHLEN	WILPEN	28% of circuit CI was driven by trees and 52% by weather during spring storms, possibly a tornado. Monitor performance outside of storm events.
16	QUINCY	SOUTH MOUNTAIN	45% of circuit CMI was due to trees. A 10/29/11 snowstorm affected performance. 2012 Action Plan: Patrol circuit mainline for hardware issues.
17	SOUTH UNION	YORK RUN	82% of the CMI was a result of wind during the 6/29/12 Derecho event. Monitor performance outside of storm events.
18	SEWICKLEY	HERMINIE	This circuit was significantly affected by a June 23rd 2012 Derecho storm. 82% of the CMI was due to tree causes and another 14% was due to lightning. Monitor circuit outside of storms.
19	BETHLEN	LAUGHLINTOWN	57% of circuit CMI was due to trees and 34% was due to OH equipment. Circuit to be reviewed for main line hardware issues in 2012.
20	VESTABURG	MEXICO	This circuit was significantly affected by a June 29th 2012 Derecho storm. 75% of the CMI was due to tree causes and another 21% was due to wind. The circuit is scheduled for a 2012 hardware review as well as a CAIDI project.
21	SOUTH UNION	SOUTH UNIONTOWN	50% of circuit CMI due trees and 48% due to wind. Circuit reviewed for main line hardware issues. Mainline tree trimming to be completed in 2012.
22	GRAND POINT	SCOTLAND	53% of circuit CMI was due trees including a 10/29/11 snowstorm. Another 33% was due to animals. 2012 Action Plan: Patrol circuit mainline for hardware issues.
23	FAVN	BULL CREEK	24% of circuit CMI was due to trees and 34% due to vehicle. Circuit reviewed for main line hardware issues. Monitor performance during normal operations.
24	HENRY CLAY	MARKLEYSBURG	43% of circuit CMI was due to trees and 33% equipment. Circuit to be reviewed for main line hardware issues in 2012. Full circuit trim planned for 2012.
25	HUNTINGDON	PENNA AVE	64% of circuit CI was driven by overload and 20% by weather during spring storms. Outages were due to equipment (recloser) overload. Load has been transferred off the circuit, and line load has been balanced. The circuit over-current protection was re-engineered in order to replace heavily loaded equipment, add additional fusing, and bring existing fusing into compliance with standard Engineering Manual guidelines.
26	MARIANNA	TEN MILE	This circuit was significantly affected by a June 29th 2012 Derecho storm. 38% of the CMI was due to unknown causes and another 47% was due to trees. The circuit is scheduled for a 2012 hardware review as well as a CAIDI project and Zone 1 danger tree review.

West Penn Power			Remedial Actions Planned or Taken
Rank	Substation	Circuit	
27	LARDIN	MCCLELLANDTOWN	61% of the circuit CMI was a result of tree causes and 26% unknown, mostly during the 6/29/12 Derecho event. Monitor performance during normal operations.
28	GREENSBORO	GREENSBORO	95% of the circuit CMI was caused by trees during the 6/29/12 Derecho event. Monitor performance during normal operation.
29	VESTABURG	LOW HILL	This circuit was significantly affected by a June 29th 2012 Derecho storm.88% of the CMI was due to unknown causes and another 10% was due to trees.The circuit is scheduled for a 2012 hardware review as well as a CAIDI project and Zone 1 danger tree review.
30	PETERS	VENETIA	28% of circuit CMI was due to vehicle and 49% equipment. Circuit to be reviewed for main line hardware issues in 2012.
31	BUCKEYE NO.3	S MUDDY CREEK	48% of the circuit CMI was caused by trees and another 31% unknown.The circuit was affected by the 6/29/12 Derecho event. Monitor performance outside of storm events.
32	WASHINGTON	PARK	This circuit was significantly affected by a June 29th 2012 Derecho storm.61% of the CMI was due to wind, 18% was due to trees, and 8% was due to lightning.The circuit is scheduled for a 2012 hardware review as well as a CAIDI project.
33	WHITE VALLEY	CONGRUITY	73% of circuit CMI due to trees. Corrective work completed in 2011. Mainline tree trimming to be completed in 2012.
34	SALTSBURG	SALINA	69% of circuit CMI due to trees. Monitor performance during normal operations.
35	LAGONDA	CLUB FORTY	This circuit was significantly affected by a June 29th 2012 Derecho storm.91% of the CMI was due to lightning. Monitor performance during normal operations.
36	MCDONALD	NOBLESTOWN	84% of circuit CMI was due to public vehicles.Circuit reviewed for main line hardware issues in 2012.
37	SEWICKLEY	ADAMSBURG	24% of circuit CMI was due to lightning and 39% of circuit CMI due to unknown cause. Monitor performance during normal operations.
38	WEST FINLEY	WEST FINLEY	This circuit was significantly affected by a June 29th 2012 Derecho storm.92% of the CMI was due to trees.The circuit is scheduled for a 2012 hardware review.

West Penn Power			
Rank	Substation	Circuit	Remedial Actions Planned or Taken
39	SHAFFERS CORNER	SEVENTH ST RD	41% of circuit CMI was due to trees and 49% due to unknowns. Zone 1 tree trimming to be performed in 2012.
40	MURRYCREST	SARDIS ROAD	82% of circuit CMI was driven by trees. Corrective work completed. Mainline tree trimming completed in 2011. Cycle trimming to be done in 2012.
41	WATERVILLE	WATERVILLE	78% of circuit CMI was due to trees. Circuit is fed from foreign utility. Alternate supply options limited. Considered distributed generation as alternate feed option (costly). Isolating points and fault indicators added as part of C-ADI improvement program. Circuit reviewed for main line hardware issues. Corrective work completed. All work completed. Circuit Monitoring to be installed in 2012. Mainline tree trimming to be done in 2012.
42	LARDIN	GRAYS LANDING	42% of the circuit CMI was caused by trees and another 24% by wind during the 6/29/12 Derecho event. Monitor performance under non-storm conditions.

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. 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. 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 § 57.195 and any additional documents that may be required under 52 Pa. Code § 57.194(h)(1).</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.