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October 1, 2012

**VIA HAND DELIVERY**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

M-2009-2094773

**RE: Biennial Inspection, Maintenance, Repair and Replacement Plan of Wellsboro Electric Company for the Period of January 1, 2014, through December 31, 2015**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") are the original and three (3) copies of the Biennial Inspection, Maintenance, Repair and Replacement Plan of Wellsboro Electric Company for the Period of January 1, 2014, through December 31, 2015.

As shown on the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of these documents, and kindly return them for our filing purposes.

Very truly yours,

McNEES WALLACE & NURICK LLC

By *Pamela C. Polacek*  
Pamela C. Polacek

Counsel to Wellsboro Electric Company

PCP/sar  
Enclosures

c: Wayne Williams, Bureau of Conservation, Economics and Energy Planning (via Hand Delivery)  
Certificate of Service

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Biennial Inspection, Maintenance, and Replacement Plan

Of Wellsboro Electric Company

For the period of January 1, 2014 – December 31, 2015

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

**Program Description**

Wellsboro Electric Company ("Wellsboro" or "Wellsboro Electric") has eight distribution circuits on its system. The total miles of overhead primary line on these circuits is approximately 466 Miles. The circuits are all located in Tioga County in Pennsylvania, in the Borough of Wellsboro, and the Townships of Charleston, Delmar and Middlebury.

**Inspection Plan**

Wellsboro will perform a vegetation management inspection on all its primary overhead distribution plant every two years. Four circuits will be inspected each year. The purpose of the vegetation management inspection is to assess the condition of vegetation on and off right of way to identify situations that may pose a threat to reliability and operations of the distribution system. The inspection will include identification of off right of way vegetation that is dead, diseased, heavily leaning or damaged that could affect the operation of the distribution system. The Company will work with property owners in an attempt to remove these hazard trees off right of way.

**Inspection Schedule**

**2014**

Dresser Circuit – 92 Miles

Stony Fork Circuit – 122 Miles

East Ave. Circuit – 33 Miles

East/West Main Circuit – 37 Miles

**2015**

Charleston #1 and #2 Circuits – 132 Miles

Middlebury Circuit – 55 Miles

Osram Circuit – 1 Mile

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**Treatment Plan**

For 2014 and 2015, Wellsboro Electric plans to perform vegetation trimming and chemical application where applicable on approximately 120 miles of overhead distribution line in the rural area of Wellsboro's system. In addition, working in conjunction with the Borough of Wellsboro's Shade Tree Commission, Wellsboro will perform selective trimming on various parts of the urban system each year based on inspections performed by the Shade Tree Commission and/or Wellsboro Electric.

**Trimming and Chemical Application for 2014 and 2015**

**2014**

Stony Fork Circuit – 60 Miles

Selective Trimming of East Ave. and East/West Main Circuit

**2015**

Stony Fork Circuit – 62 Miles

Selective Trimming of East Ave. and East/West Main Circuit

**Justification**

Wellsboro Electric's Management plan complies with 52 Pa. Code Chapter 57 Section 57.198 (n)(1). No waiver for this section is being requested.

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**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 inspection must include:

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

**Program Description**

Wellsboro Electric will inspect all distribution poles on a 10 year cycle. All poles will be inspected for decay, damage, illegal attachments, and potential hazards associated with the electrical equipment, and to ensure that all applicable NESC codes are being met. Wellsboro proposes to use the traditional sound and bore method or the sonic wave method. With either inspection method, if the pole is suspected of internal decay it will then be inspected below grade. If the remaining strength of the pole is found to be deficient, the pole will be classified as a reject pole (a pole that fails the ground line inspection but does not meet the definition found in section 57.198 (n)(3) of the Pennsylvania Code, Title 52), a re-enforceable reject pole (a pole that can be restored to an acceptable strength when re-enforced with a steel truss or similar device), or a danger pole (danger poles meet the definition found in Section 57.198 (n)(3) of the Pennsylvania Code, Title 52).

Wellsboro will replace all poles that meet the definition found in Section 57.198 (n)(3) within 30 days of the date of the inspection by in-house crews or contract crews.

Wellsboro has 14,600 poles on the distribution system and proposes to inspect 1500 poles per year.

**2014 and 2015 Pole Testing Planned**

2014 – 1500 Poles

2015 – 1500 Poles

**Justification**

Wellsboro is requesting an exemption from the load calculation portion of the requirement due to the high cost of performing the calculation on each pole and the benefit it will provide. Wellsboro Electric will perform a pole strength evaluation prior to the attachment of additional third party attachments to ensure the integrity of the pole. Wellsboro currently uses a class 3 and lower pole for normal construction.

**Section 57.198 (n)(4). Distribution Overhead Line Inspection.** 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 transformer.
- (iii) Other conditions that may adversely affect the operation of the overhead distribution line.

**Program Description**

Wellsboro will conduct inspections of its overhead distribution facilities by ground patrol every two years. The purpose of the inspection is to verify that the overhead facilities are in a safe, operational, and reliable condition. The inspections will be conducted by trained company representatives or a contract service. The inspection will be documented, and if problems are found that information will be forwarded to the Engineering and Operations Department for further action and documented in the Wellsboro Electric service or work order system.

**Overhead Line Inspections for 2014 and 2015**

**2014**

Middlebury Circuit

Dresser Circuit

East Ave. Circuit

East/ West Main Circuit

**2015**

Charleston #1 Circuit

Charleston #2 Circuit

Stony Fork Circuit

Osram Circuit

**Justification**

Wellsboro Electric's Overhead Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n)(4). No waiver is being requested.

**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 the date of discovery.

**Program Description**

Any deficiencies found on Wellsboro Electric's overhead distribution system discovered during the Distribution Overhead Line Inspection will be addressed based on the severity of the situation. Those items that may affect the integrity of the circuits will be repaired or replaced within 30 days of discovery. All safety items will be addressed immediately by Wellsboro Electric crews or contacted crews as needed.

**Justification**

Wellsboro Electric's Overhead Line Inspection Plan meets the requirements of 52 Pa. Code Section 57.198 (n)(5). No waiver is being requested.

**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 mount 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) Installations 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**

Wellsboro Electric will inspect all of its overhead distribution transformers on a two-year cycle as part of the overhead distribution line inspection program.

Wellsboro Electric will inspect all of its pad mount transformers on a five-year cycle. Wellsboro has no below grade transformers on the system. The purpose of the inspection is to verify that all transformers are in a safe, operational, and reliable condition. The inspection will look for rust, dents and other evidence of contact, leaking oil, and installations of fences and shrubbery that could affect the operation or maintenance of the unit. Unauthorized excavations and changes in grade near the transformer, and any other condition that may affect it will also be inspected.

Inspection information will be documented. Conditions that require follow up will be forwarded to the Engineering and Operations department for corrective action and logged in the Wellsboro Electric Service or Work Order System. Safety issues will be addressed immediately.

The work will be conducted by trained company personnel or by contract personnel.

**2014 and 2015 Overhead Transformer Inspections**

**2014**

Middlebury Circuit

Dresser Circuit

East Ave. Circuit

East/West Main Circuit

**2015**

Charleston #1 Circuit

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Charleston #2 Circuit

Osram Circuit

Stony Fork Circuit

**Pad Mount Transformer inspections**

**2014**

Charleston #2 Circuit

Dresser Circuit

**2015**

East/West Main Circuit

East Ave. Circuit

*Middlebury Circuit*

**Justification**

Wellsboro Electric's Transformer Inspection Plan meets the requirements of 52 Pa Code Section 57.198 (n)(6). No waiver is being requested.

**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 distribution line inspection plan.

**Program Description**

Wellsboro Electric will inspect all of its three phase and single phase reclosers on a one year cycle or less.

The purpose of performing the inspection is to ensure continued safe and reliable operations of the reclosers. The inspection will be conducted by a trained employee of Wellsboro Electric. The inspection will check for physical damage, oil leaks, and any other condition that would affect the operation of the recloser.

Inspection information will be documented. Conditions that require follow up will be forwarded to the Engineering and Operations department for corrective action and logged in the Wellsboro Electric Service or Work Order system. Safety related issues will be corrected immediately. All other issues will be handled based on the severity of the issue.

**Inspection Plan**

Three Phase Units – Inspected Annually

Single Phase Units – Inspected Annually

**Justification**

Wellsboro Electric's Recloser Inspection Plan meets the requirements of 52 Pa. Code Section 157.98 (n)(7). No waiver is being requested.

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**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**

Wellsboro Electric will inspect all of its distribution substations on a cycle of five weeks or less. The inspections will be conducted by a qualified company representative. The inspector will look for any physical damage, unsafe conditions, or potential problems with the substation equipment, structures and hardware. Loading and any status alarms will be recorded.

Inspection information will be recorded on a standard company substation inspection form. Conditions that require any follow up will be forwarded to the Operations and Engineering Department for *corrective action. Any safety related items will be corrected immediately.*

A perimeter check of the property and fence will also be conducted to ensure the proper signage is present and all locks are present and secure.

**Inspection Plan**

**2014**

Austin St. Substation – Twelve Inspections.

Buena Vista Substation – Twelve Inspections.

Buena Vista Hilltop Substation – Twelve Inspections.

**2015**

Austin St. Substation – Twelve Inspections.

Buena Vista Substation – Twelve Inspections.

*Buena Vista Hilltop Substation – Twelve inspections.*

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**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

**VIA FIRST-CLASS MAIL**

Office of Consumer Advocate  
555 Walnut Street  
Forum Place - 5th Floor  
Harrisburg, PA 17101-1921

Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

*Pamela C. Polacek*

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Pamela C. Polacek  
Counsel to Wellsboro Electric Company

Dated this 1<sup>st</sup> day of October, 2012, at Harrisburg, Pennsylvania.

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