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P.O. Box 16001  
Reading, PA 19612-6001

VIA OVERNIGHT MAIL

January 27, 2012

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

RE: Revisions to Biennial Inspection, Maintenance, Repair and Replacement Plan – Pennsylvania Electric Company - Docket No. M-2009-2094773

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Pennsylvania Electric Company (“Penelec”) are an original and four (4) copies of its revised Biennial Inspection, Maintenance, Repair and Replacement Plan (“Plan”). On October 3, 2011, Penelec filed its Biennial Inspection, Maintenance, Repair and Replacement Plan (“Plan”), pursuant to 52 Pa. Code § 57.198(a), to become effective on January 1, 2013. Penelec proposed modifications to the following programs, or parts of programs: distribution overhead line inspection interval, distribution transformer inspection interval and substation inspections. Penelec also submitted a request as an addendum to its third quarter reliability report, which was filed on November 1, 2011, to modify its existing 2011-2012 Plan to be consistent with the proposed 2013-2014 Plan.

On December 28, 2011 the Pennsylvania Public Utility Commission issued a Secretarial Letter which accepted in part and rejected in part Penelec’s Plan, which decision extended to the proposed interim changes to its existing 2011-2012 Inspection and Maintenance Plan. The Secretarial Letter directed that Penelec submit revisions to those portions of the Plan that were rejected by the Commission within thirty days. As to the request that was submitted as an addendum to its third quarter reliability report to modify its existing 2011-2012 Plan, Penelec will continue inspecting in 2012 based on the Plan as approved on December 15, 2009. Penelec has enclosed herein its revised Plan in compliance with that directive.

The Plan changes are as follows:

- Distribution Overhead Line Inspections – revised Plan to reflect a five year cycle
- Above-Ground Pad-Mounted Transformer Inspections – revised Plan to reflect a five year cycle
- Substation Inspections – revised Plan to reflect monthly equipment, structures and hardware inspections
- Record Keeping – added this section to each program

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Penelec respectfully requests that the Pennsylvania Public Utility Commission accept its Biennial Inspection, Maintenance, Repair and Replacement Plan as revised consistent with the Commission's December 28, 2011 Secretarial Letter. If you have any questions, please contact me or Eric Dickson at (330) 384-5970.

Please date stamp and return the extra copy in the envelope provided as evidence of filing.

Sincerely,

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

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

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**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

Pennsylvania Electric Company ("Penelec") 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.

For further detailed information regarding Penelec's vegetation management program, reference the FE Vegetation Management Program Description.

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Inspection Plan<sup>1</sup>

Area	Inspections and Treatments Planned	
	Total Circuit Miles	
	2013	2014
Oil City 2,499 total circuit miles	625	625
Johnstown 2,383 total circuit miles	596	596
Towanda 2,695 total circuit miles	674	674
Altoona 1,760 total circuit miles	440	448
Clearfield 2,606 total circuit miles	652	652
Lewistown 1,665 total circuit miles	416	460
Erie 2,405 total circuit miles	601	601
Mansfield 1,999 total circuit miles	500	500
<b>Penelec</b> 18,012 total circuit miles		

**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)

<sup>1</sup> Nothing in this Vegetation Management Program, the Company's Contractor Guidelines or the Commission rules and regulations is intended to limit or modify the grant of legal rights to the Company under a right-of-way or easement. To the extent that a question arises regarding the legal rights, including the existence and scope of easements and right-of-ways, such questions remain in the exclusive jurisdiction of a court of law.

**Section 57.198(m). Record Keeping.** *Maintain records of inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs.*

In order to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs, Penelec will maintain inspection and maintenance records either electronically or in hard copy as required by state law.

**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

Pennsylvania Electric Company ("Penelec") 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

For further detailed information regarding Penelec's inspection of wood poles, reference the Distribution Inspection & Maintenance Practice – Wood Poles.

Inspection Plan

	Area	Pole Inspections Planned (Number of Poles)	
		2013	2014
<b>Penelec</b> 493,339 total poles	Oil City 63,421 total poles	8,000	5,400
	Erie 72,811 total poles	8,950	6,920
	Johnstown 74,031 total poles	4,500	5,860
	Towanda 68,257 total poles	4,000	5,260
	Altoona 54,747 total poles	4,000	3,650
	Clearfield 65,731 total poles	4,200	5,250
	Lewistown 46,123 total poles	2,000	3,440
	Mansfield 48,218 total poles	5,461	5,331

**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 Penelec 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.

**Section 57.198(m). Record Keeping.** *Maintain records of inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs.*

In order to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs, Penelec will maintain inspection and maintenance records either electronically or in hard copy as required by state law.

**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**

Pennsylvania Electric Company (“Penelec”) shall visually inspect overhead lines and equipment on a five-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-fifth 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 – condition, damage
- Guying – condition, damage
- Pole-mounted distribution equipment – condition, damage

For further detailed information regarding Penelec’s inspection of Distribution Overhead Lines, reference the Distribution Inspection & Maintenance Practice – Overhead Circuits and Equipment.

Inspection Plan

	Area	Overhead Line Inspections Planned (Number of Circuits)	
		2013	2014
<b>Penelec</b> 1,241 total circuits	Oil City 184 total circuits	37	37
	Erie 200 total circuits	40	40
	Johnstown 176 total circuits	35	35
	Towanda 172 total circuits	34	35
	Altoona 154 total circuits	31	31
	Clearfield 121 total circuits	24	24
	Lewistown 97 total circuits	19	19
	Mansfield 137 total circuits	28	27

**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 Penelec 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 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 five-year cycle is based on accepted electric utility practices and the experience of Penelec. 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 five (5) years between inspections has historically been utilized 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 an inspection every five years, there are many other opportunities for Penelec personnel to view the overhead line facilities and identify any potential issues. Penelec'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 Penelec's five-year inspection program. Any emergent priority overhead line problems identified during these other inspections are addressed in a timely manner.

**Section 57.198(m). Record Keeping.** *Maintain records of inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs.*

In order to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs, Penelec will maintain inspection and maintenance records either electronically or in hard copy as required by state law.

**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

Pennsylvania Electric Company (“Penelec”) visually inspects overhead distribution transformers as part of the overhead line inspection. Above-ground pad-mounted transformers are inspected on a five-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
- 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

For further detailed information regarding Penelec’s inspection of distribution transformers, reference the Distribution Inspection & Maintenance Practice – Underground Equipment.

Inspection Plan

Area	Type	Transformer Inspections Planned (Total Transformers)	
		2013	2014
Oil City	Overhead Transformers <i>20,320 total transformers</i>	4,064	4,064
	Above-Ground Pad-mounted <i>2,701 total transformers</i>	540	540
	Below-Ground Transformers <i>189 total transformers</i>	24	24
Erie	Overhead Transformers <i>20,053 total transformers</i>	4,011	4,011
	Above-Ground Pad-mounted <i>4,660 total transformers</i>	936	936
	Below-Ground Transformers <i>120 total transformers</i>	15	15
Johnstown	Overhead Transformers <i>22,982 total transformers</i>	4,596	4,596
	Above-Ground Pad-mounted <i>4,092 total transformers</i>	818	818
	Below-Ground Transformers <i>346 total transformers</i>	43	43
Towanda	Overhead Transformers <i>18,949 total transformers</i>	3,790	3,790
	Above-Ground Pad-mounted <i>1,796 total transformers</i>	359	359
	Below-Ground Transformers <i>147 total transformers</i>	18	18
Altoona	Overhead Transformers <i>18,858 total transformers</i>	3,772	3,772
	Above-Ground Pad-mounted <i>3,814 total transformers</i>	763	763
	Below-Ground Transformers <i>312 total transformers</i>	39	39
Clearfield	Overhead Transformers <i>21,071 total transformers</i>	4,214	4,214
	Above-Ground Pad-mounted <i>1,879 total transformers</i>	376	376
	Below-Ground Transformers <i>244 total transformers</i>	31	31
Lewistown	Overhead Transformers <i>14,497 transformers</i>	2,899	2,899
	Above-Ground Pad-mounted <i>2,853 total transformers</i>	571	571
	Below-Ground Transformers <i>209 total transformers</i>	26	26
Mansfield	Overhead Transformers <i>13,465 total transformers</i>	2,693	2,693
	Above-Ground Pad-mounted <i>1,056 total transformers</i>	211	211
	Below-Ground Transformers <i>128 total transformers</i>	16	16

**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 and above-ground pad-mounted transformers on a five-year cycle and below-ground transformers on an eight-year cycle is based on accepted electric utility practices and the experience of Penelec. 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 above periodicities 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(m). Record Keeping.** *Maintain records of inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs.*

In order to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs, Penelec will maintain inspection and maintenance records either electronically or in hard copy as required by state law.

**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

Pennsylvania Electric Company ("Penelec") 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

For further detailed information regarding Penelec's inspection of reclosers, reference the Distribution Inspection & Maintenance Practice – Line Reclosers.

Inspection Plan

Area	Type	Recloser Inspections Planned		
		Total Number of Reclosers		
		2013	2014	
Penelec 2,574 total reclosers	Oil City 468 total reclosers	Single Phase 380 total reclosers	380	380
		Three Phase 88 total reclosers	88	88
	Erie 466 total reclosers	Single Phase 382 total reclosers	382	382
		Three Phase 84 total reclosers	84	84
	Johnstown 163 total reclosers	Single Phase 48 total reclosers	48	48
		Three Phase 115 total reclosers	115	115
	Towanda 338 total reclosers	Single Phase 282 total reclosers	282	282
		Three Phase 56 total reclosers	56	56
	Altoona 305 total reclosers	Single Phase 230 total reclosers	230	230
		Three Phase 75 total reclosers	75	75
	Clearfield 378 total reclosers	Single Phase 301 total reclosers	301	301
		Three Phase 77 total reclosers	77	77
	Lewistown 224 total reclosers	Single Phase 186 total reclosers	186	186
		Three Phase 38 total reclosers	38	38
	Mansfield 232 total reclosers	Single Phase 192 total reclosers	192	192
		Three Phase 40 total reclosers	40	40

**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 Penelec. 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(m). Record Keeping.** *Maintain records of inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs.*

In order to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs, Penelec will maintain inspection and maintenance records either electronically or in hard copy as required by state law.

**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

Pennsylvania Electric Company ("Penelec") inspects its distribution substations twelve times annually. The purpose of these monthly inspections of the distribution substations is to capture monthly 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.

Each monthly preventative maintenance inspection consists of two groups of related tasks, monthly readings and the patrol inspection.

1. Monthly Readings
  - Read and record currents, voltages, temperatures, pressures and operations counters on installed substation equipment
2. Patrol Inspection – 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)
  - Substation major equipment (power transformers, circuit breakers, instrument transformers)
  - Batteries and chargers
  - Relays

For further detailed information regarding Penelec's inspection of substations, reference the Substation Practice Manual.

Inspection Plan

	Area	Substation Inspections Planned	
		Number of Substations	
		2013	2014
<b>Penelec</b> 414 total substations	Oil City 36 substations	432	432
	Warren 29 substations	348	348
	Erie 41 substations	492	492
	Towanda 32 substations	384	384
	Mansfield 22 substations	264	264
	Tunkhannock 28 substations	336	336
	Altoona 58 substations	696	696
	Richland 54 substations	648	648
	Clearfield 53 substations	636	636
	Lewistown 25 substations	300	300
	Indiana 13 substations	156	156
	Huntington 23 substations	276	276

**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 Penelec. 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.

**Section 57.198(m). Record Keeping.** *Maintain records of inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs.*

In order to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs, Penelec will maintain inspection and maintenance records either electronically or in hard copy as required by state law.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Revisions to Biennial Inspection, :  
Maintenance, Repair and Replacement :  
Plan – Pennsylvania Electric Company :  
Docket No. M-2009-2094773 :  
:

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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, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

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Service by electronic mail, as follows:

Darren Gill  
Bureau of Technical Utility Services  
Pennsylvania Public Utility Commission  
[dgill@pa.gov](mailto:dgill@pa.gov)

Dated: January 27, 2012

Original Signed:

*Lori Barman / SA*

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FirstEnergy Service Company  
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