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Orange and Rockland Utilities, Inc.
390 West Route 59
Spring Valley NY 10977-5300
www.oru.com

October 24, 2012

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Honorable Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, P A 17120

Re: Pike County Light & Power Company
Biennial Inspection, Maintenance, Repair and Replacement Plan

M-2009-2094773

Dear Secretary Chiavetta:

Pursuant to the provisions of 52 Pa. Code §57.198, Pike County Light & Power Company ("PCL&P") hereby files four copies of its biennial Inspection and Maintenance Plan ("I&M Plan") for the periodic inspection, maintenance, repair, and replacement of its facilities.

PCL&P is requesting a waiver for the requirement to perform load calculations as part of its pole inspections. PCL&P provides application guidance in its design and construction standards to assure that all poles installed can safely handle standard utility equipment loads. A requirement to perform load calculations as part of the pole inspection program is thus not warranted. PCL&P's I&M Plan meets all other requirements of 52 Pa. Code §57.198.

Sincerely,

Francis Peverly
Vice-President Operations

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Biennial Inspection, Maintenance, Repair
and Replacement Plan of
Pike County Light & Power Company**

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

Submitted by:
Francis Peverly
Vice President – Operations
390 W. Route 59
Spring Valley, NY 10977
Email: peverlyf@oru.com

Dated: October 19, 2012

§57.198(N)(1). Vegetation Management. *The statewide minimum inspection and treatment cycle for vegetation management is between four to eight 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:

Pike County Light & Power Company ("PCL&P" or the "Company") has two main distribution feeds for its service territory; the total overhead primary mileage is approximately 87.0 miles. The circuits are all located within Pike County, Pennsylvania. PCL&P maintains this system on a three-year distribution vegetation maintenance cycle.

In 2012 the entire PCL&P territory underwent the scheduled distribution vegetation management program including pruning and removal of vegetation on all primary voltage wire. The next maintenance cycle for the PCL&P territory is scheduled for 2015.

Treatment Plan:

The PCL&P distribution vegetation maintenance treatment plan is to maintain fully the entire primary distribution system within each three-year period.¹ The entire 87.0 miles was last maintained in 2012. On this last maintenance cycle, approximately 8,500 trees were maintained by either pruning or removal. In between the vegetation maintenance cycles, spot vegetation treatment is completed as conditions are spotted during investigations or as reported by customers and municipalities or any other entity.

To monitor performance of the vegetation management program, all vegetation caused primary interruptions on PCL&P substations are tracked on a daily basis using the Orange and Rockland Utilities, Inc. ("Orange and Rockland") Outage Management System. This monitoring allows PCL&P Vegetation Manager to track the number of individual vegetation interruptions and customers affected to gauge vegetation management performance of the maintained substations. Where appropriate, herbicide treatment of the cut vegetation (cut stump treatment) is completed.

Vegetation Treatment Cycle:

PCL&P has established a vegetation maintenance treatment cycle of three years for all distribution circuits. The treatment cycle for each circuit is shown in the table below:

	Pike County Light and Power Distribution Vegetation Management	
	Circuit	Expected Treatment Cycle
Matamoros	104-1	3 years
	104-2	3 years
Line 7	Line 7	3 years

¹ 146 customers are served on circuit 6-8-13 and 18 customers are served on circuit 3-1-34, which are managed as part of Orange and Rockland Utilities, Inc.'s (i.e., PCL&P's utility affiliate) vegetation maintenance plan for New York, where these circuits originate.

Justification

PCL&P's Vegetation Management Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n)(1). No waiver is being requested.

§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 insect infestation;*
- (iv) Visual inspection for evidence of unauthorized backfilling or excavation near the pole;*
- (v) Visual inspection for signs of lightning strikes; and*
- (vi) A load calculation.*

Program Description

Distribution poles will be inspected on a 12-year cycle. There are 4,119 distribution poles in PCP&L territory, and 350 poles will be inspected per year in 2014 and 2015. All poles will be inspected and treated in accordance with specification EO-10345 "Inspection and Groundline Treatment of Standing Wood Poles", a copy of which may be obtained from the office of the Vice-President - Operations. All poles are visually inspected. Poles older than twelve years are sounded, and then bored if needed and treated. A full excavation is performed if needed and an external treatment applied.

Inspection Plan

	Pole Inspections Planned (Number)	
	2014	2015
PCL&P	350	350

Justification

Load calculations are not routinely performed as part of the PCL&P pole inspection program. Design personnel follow PCL&P's Electric Distribution Standards that utilize load calculations to define classes of poles required for all standard pole-mounted equipment, and specify the minimum mounting distance from the pole top for the equipment to be installed on the pole. Adherence to these specifications assures proper pole application and design to handle the routine loads that are installed. If a pole appears to be overloaded or if other than routine equipment is to be added to the pole, the specific pole is evaluated.

PCL&P is requesting a waiver for the requirement to perform load calculations as part of the pole inspections. PCL&P provides design guidance for the proper selection of a pole class to meet the standard load to be installed. A requirement to perform load calculations as part of the pole inspection program is thus not warranted.

§57.198(n)(3). Pole Inspection Failure. *If a pole fails the ground line inspection and shows dangerous conditions that are an immediate risk to public or employee safety or conditions affecting the integrity of the circuit, the pole shall be replaced within 30 days of the date of inspection.*

Program Description

Poles that do not pass an inspection fall into the following three categories: priority, reinforceable and regular reject. Poles that are determined to be an immediate risk to public or employee safety, or conditions affecting the integrity of the circuit are classified as priority poles, and are replaced within 30 days.

Justification

PCL&P's Distribution Pole Inspection Failure Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n)(3). No waiver is being requested.

§57 198(n)(4) Distribution Overhead Line Inspections. *Distribution lines shall be inspected by ground patrol a minimum of once every one to two years. A visual inspection must include checking for:*

- (i) Broken insulators;*
- (ii) Conditions that may adversely affect operation of the overhead transformer; and*
- (iii) Other conditions that may adversely affect operation of the overhead distribution line.*

Program Description

PCL&P will conduct inspections of its overhead distribution facilities by ground patrol every two years. The purpose of the inspection program is to verify that the overhead facilities are in a safe, operational and reliable condition. The inspections will be performed by a qualified Company representative. The overhead lines and equipment will be inspected for damage including broken insulators and conductors, equipment fluid leaks, infrared hot spots and any other conditions which may adversely affect the distribution system. Inspection information will be documented and corrective action performed..

Inspection Plan

	Circuit	Overhead Line Inspections Planned (Miles)	
		2014	2015
PCL&P	6-8-13	6.81	0
5 circuits (93.35 miles)	3-15-34	2.35	0
	104-1-13	0	13.14
	104-3-13	0	15.29
	L7	27.88	27.88

Justification

PCL&P's Distribution Overhead Line Inspection Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n)(4). No waiver is being requested.

§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

Any deficiencies on PCL&P's overhead distribution system discovered during performance of its distribution overhead line inspections will be addressed based on the severity of the deficiency. Critical maintenance problems that may affect the integrity of circuits will be repaired or replaced within 30 days of discovery.

Justification

PCL&P's Distribution Overhead Line Inspection Failure Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n)(5). No waiver is being requested.

§57 198(n)(6) Distribution Transformer Inspections. *Overhead distribution transformers shall be visually inspected as part of the distribution line inspection every one to two years. Above-ground pad-mounted transformers shall be inspected at least as often as every five years and below-ground transformers shall be inspected at least as often as every eight 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; and*
- (iv) Unauthorized excavation or changes in grade near the transformer.*

Program Description

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

PCL&P will inspect all of its padmount on a five-year cycle. There are no below-ground transformers on the Pike system. The purpose of the inspection is to verify that all transformers are in a safe, operational and reliable condition. The inspection will be performed by a qualified Company representative. The inspector will look for rust, dents and other evidence of contact, leaking oil, installations of fences and shrubbery that could adversely affect access to and operation of the transformer, unauthorized excavations or changes in grade near the transformer and any other conditions which may affect the safety, access to or operation of the transformer.

Inspection information will be documented. Conditions that require corrective actions will be repaired as required by the severity of the deficiency identified.

Inspection Plan

	Circuit	Overhead Transformer Inspections Planned (Number)	
		2014	2015
PCL&P 1,164 Overhead Type 2 year cycle	6-8-13	55	0
	3-1S-34	7	0
	104-1-13	0	180
	104-3-13	0	187
	L7	368	367

	Circuit	Padmount Transformer Inspections Planned (Number)	
		2014	2015
PCL&P 269 Padmount Type 2 year cycle	6-8-13	0	1
	3-1S-34	0	0
	104-1-13	0	9
	104-3-13	0	41
	L7	109	109

Justification

PCL&P's Distribution Transformer Inspection Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n)(6). No waiver is being requested.

§57 198(n)(7). Recloser Inspections. Three phase reclosers shall be inspected on a cycle of eight years or less. Single phase reclosers shall be inspected as part of the EDC's distribution line inspection plan.

Program Description

PCL&P visually inspects each three-phase recloser annually, and performs functional tests every three years. No single phase reclosers are used on the PCP&L system.

Inspection Plan

	Recloser Inspections Planned	
	2014	2015
PCL&P	3	3

Justification

PCL&P Recloser Inspection Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n)(7). No waiver is being requested.

§57 198(n)(8). Substation Inspections. Substation equipment, structures, and hardware shall be inspected on a cycle of five weeks or less.

Program Description

PCL&P inspects its one substation facility on a monthly basis. The purpose of this inspection is to capture abnormalities before they become larger problems. Visual inspections and the collection of counter readings and equipment information has proven to be valuable in predicting the health and integrity of our substation equipment and facilities.

Each month a class #1 inspection is performed as described below:

- Visual inspection of transformers and oil breakers for oil leaks, oil levels, nitrogen pressure, connections, condition of bushings and Oil Circuit Breaker operating mechanism;
- Visual inspection of battery banks, chargers, control board indicating lights, control house lights, yard lights;
- Visual inspection of minor equipment including Potential Transformers, Current Transformers, Capacitive Coupled Potential Devices, disconnect switches and bus connections;
- Visual inspection of all structures, fences and yard surfaces; and
- Counter readings taken of OCBs, Gas Circuit Breakers, reclosers and tap changers.

Inspection Plan

	Substation	Substation Inspections Planned	
		2014	2015
PCL&P	Matamoras	12	12

Justification

PCL&P Substation Inspection Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n)(8). No waiver is being requested.

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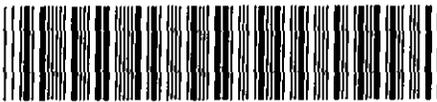
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