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File #: 140056

December 17, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Petition of PPL Electric Utilities Corporation for Approval of its Long-Term Infrastructure Improvement Plan - Docket No. P-2012-2325034

Dear Secretary Chiavetta:

Enclosed are PPL Electric Utilities Corporation's Responses to Data Requests of the Office of Technical Utility Services – Set II in the above-referenced proceeding.

Copies have been provided as indicated on the Certificate of Service.

Respectfully Submitted,


Jessica R. Rogers

JRR/jl

Enclosures

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copies of the foregoing **Responses to Data Requests** have been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

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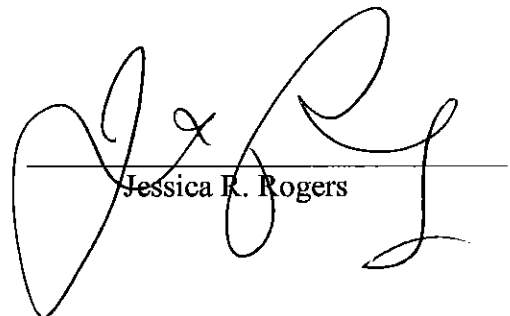
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Date: December 17, 2012


Jessica R. Rogers

**PPL Electric Utilities Corporation
Response to Data Request II of the
Office of Technical Utility Services, Set I
Dated December 11, 2012
Docket No. P-2012-2325034**

P-5 Question - Page 10 of the LTIIP contains a table showing the annual expenditure history for 2008-2012, provide this same data for 2006 and 2007.

	2006	2007	2008	2009	2010	2011	2012*
Asset Optimization Strategy		\$ 328	\$ 115,046	\$ 5,115,041	\$ 19,661,586	\$ 32,667,111	\$ 20,438,113
Improve System Reliability	\$ 10,221,862	\$ 9,424,550	\$ 7,177,339	\$ 12,470,418	\$ 33,186,012	\$ 39,598,466	\$ 26,672,610
Smart Grid Investment				\$ 100,193	\$ 9,299,164	\$ 7,320,142	\$ 5,458,371
Maintain System Reliability	\$ 30,766,299	\$ 25,565,257	\$ 33,648,603	\$ 34,407,064	\$ 46,388,673	\$ 47,206,474	\$ 51,980,585
Unreimbursed Highway Relocations	\$ 1,263,096	\$ 1,608,534	\$ 3,082,209	\$ 3,265,414	\$ 2,521,236	\$ 4,858,351	\$ 2,254,769
Total	\$42,251,256	\$36,598,668	\$ 44,023,197	\$ 55,358,131	\$ 111,056,672	\$ 131,650,544	\$ 106,804,448

P-6 Question - On Page 11 of the LTIIP, PPL Electric states possible problems caused by a backlog of material deliveries. Provide any solutions put in place to address or avoid this potential problem.

P-6 Response - PPL Electric uses a variety of mechanisms to avoid potential delays due to material backlogs, including:

- Using multiple vendors for the same material where warranted
- Requiring frequent updates on orders from suppliers
- Leveraging information systems for material tracking
- Maintaining adequate on-site supply of frequently used materials
- Engaging in regular communication with suppliers

Historically, this approach has proved successful and PPL Electric seldom experienced construction delays due to material backlogs. However, there are rare instances of a manufacturer recall, or an associated safety concern that could delay PPL Electric's ability to continue to install impacted equipment.

P-7 Question - In response to P-3, PPL Electric provided the history of the units repaired or replaced in 2008 to 2012 for each of the DSIC eligible asset groups. We will need the following additional information:

- a. Provide the annual expenditures associated with these assets for each year from 2008 to 2012 and reconcile each asset group's yearly change compared to those expenditures projected in the LTIIP.
- b. Describe if the LTIIP is projecting overall expenditures to increase, decrease, or remain constant, for each asset group.
- c. Describe which specific asset groups are projected to accelerate repairs, replacements and installations in DSIC eligible plant expenditures and which will remain the same or be reduced following the LTIIP implementation.
- d. For each asset group, describe how PPL Electric's approach has changed with the proposed LTIIP.

P-7 Response –

- a. Attachment 1 shows the annual asset expenditures associated with these assets from 2008 to 2012. The column labeled "Comments" on Attachment 1 provides a general reconciliation of past spending with plans under the LTIIP.
- b. The column labeled "Planned Funding Change" on Attachment 1 indicates the future funding trajectory of each program.
- c. See response to Part b, above.
- d. The LTIIP does not represent a significant change to the accelerated approach adopted by PPL Electric in 2009 to address distribution infrastructure. PPL Electric adopted its Asset Optimization Strategy in 2009, with the goal of accelerating capital expenditure to address its aging infrastructure. The LTIIP reflects a continuation of that plan. Minor revisions have been made since the original plan, and will continue to be made, to reflect changing circumstances. While the Company's approach hasn't changed with the LTIIP, the certainty regarding the Company's ability to finance and execute the plan has increased with the introduction of the DSIC mechanism.

Attachment 1

LTII PLAN DESCRIPTION	Expenditures (\$ millions)					Planned Funding Change	Comments
	2008	2009	2010	2011	2012		
Distribution Pole Replacements	\$ 9.18	\$ 6.09	\$ 5.75	\$ 8.93	\$ 12.48	Decrease	Introduced fiber wrapping, this will lower future pole replacement rate.
C-Truss Distribution Poles	\$ 0.34	\$ 2.92	\$ 3.04	\$ 2.79	\$ 3.07	Decrease	Introduced fiber wrapping, this will lower future c-truss rate.
Fiber Wrap Distribution Poles	\$ -	\$ -	\$ -	\$ -	\$ 2.28	Increase	New program started in 2012.
Recloser Replacements	\$ 1.45	\$ 1.26	\$ 7.80	\$ 5.27	\$ 3.33	Increase	Increased annual refurbishments.
Capacitors	\$ 1.01	\$ 0.75	\$ 1.11	\$ 0.69	\$ 0.98	Decrease	Review showed decreased need for new capacitors at this time.
New Hydraulic Reclosers	\$ -	\$ 0.31	\$ 0.81	\$ 0.75	\$ 0.06	Increase	Increasing sectionalizing capability.
Distribution Animal Guarding	\$ -	\$ 1.33	\$ 2.65	\$ 1.94	\$ 0.06	Decrease	Slight decrease due to effective saturation.
Distribution Failed Equipment	\$ 8.04	\$ 9.91	\$ 12.05	\$ 12.64	\$ 13.05	Increase	Corrective, budgeting for increased failed equipment due to infrastructure age.
Replace Failed Underground Primary Cable	\$ 2.63	\$ 3.29	\$ 3.23	\$ 4.23	\$ 2.87	Increase	Corrective, budgeting for increased failed equipment due to infrastructure age.
Replace Failed Underground Secondary Cable	\$ 0.90	\$ 1.65	\$ 1.35	\$ 1.89	\$ 1.35	Increase	Corrective, budgeting for increased failed equipment due to infrastructure age.
Replace Failed 12kV Underground Getaway Cable	\$ 0.24	\$ 0.39	\$ 0.56	\$ 0.72	\$ 0.43	Increase	Corrective, budgeting for increased failed equipment due to infrastructure age.
Replace Deteriorated/Failed Area Supply Substation Equipment	\$ 1.08	\$ 0.61	\$ 1.37	\$ 1.10	\$ 1.38	Increase	Corrective, budgeting for increased failed equipment due to infrastructure age.
Underground Residential Development Cable Replacement and Life Extension - Replacement after Test	\$ 6.60	\$ 5.31	\$ 4.95	\$ 4.87	\$ 5.46	Increase	Increasing funding to address aging infrastructure.
Underground Residential Development Cable Replacement and Life Extension - Proactive Replacement	\$ -	\$ 0.01	\$ 2.81	\$ 3.54	\$ 0.12	Increase	Increasing funding to address aging infrastructure.
Underground Residential Development Cable Replacement and Life Extension - Cure	\$ 0.63	\$ 1.40	\$ 3.14	\$ 1.40	\$ 0.89	Increase	Increasing funding to address aging infrastructure.
Low Tension Network Primary Cable, Equipment and Structures - ITN Equipment	\$ 0.00	\$ 0.00	\$ 1.02	\$ 4.08	\$ 4.19	Increase	Increasing funding to address aging infrastructure.
Low Tension Network Primary Cable, Equipment and Structures - Lead Cable	\$ 0.00	\$ 0.00	\$ 0.88	\$ 2.71	\$ 0.04	Increase	Increasing funding to address aging infrastructure.
12 kV Underground Getaway Cables	\$ -	\$ 0.00	\$ 0.63	\$ 3.70	\$ 1.69	Increase	Increasing funding to address aging infrastructure.
Copper Weld Copper	\$ -	\$ 0.19	\$ 3.62	\$ 4.36	\$ 0.13	Increase	Steady. Drive to get CWC off system.
Customers Experiencing Multiple Interruptions	\$ -	\$ 0.16	\$ 3.22	\$ 2.84	\$ 2.46	Constant	Steady. Program meets objectives at spending level.
Distribution Reliability Preservation	\$ 5.37	\$ 7.01	\$ 16.29	\$ 10.16	\$ 4.58	Constant	Steady. Program meets objectives at spending level.
Reliability Preservation Emergent	\$ 0.58	\$ 0.42	\$ 0.78	\$ 1.02	\$ 1.53	Constant	Steady. Program meets objectives at spending level.
Circuit SAIDI Improvement	\$ 1.70	\$ 2.06	\$ 3.49	\$ 3.95	\$ 2.78	Increase	Increasing funding to address reliability issues, add smart devices.
Distribution Automation Deployment	\$ -	\$ 0.10	\$ 9.30	\$ 7.32	\$ 5.46	Increase	Relatively new program, ramping up.
System Reliability Improvement Projects	\$ 0.11	\$ 1.17	\$ 6.59	\$ 21.19	\$ 17.21	Constant	Steady. Program meets objectives at spending level.
Unreimbursed Highway Relocations	\$ 3.08	\$ 3.27	\$ 2.52	\$ 4.86	\$ 2.25	Constant	Steady. Program meets objectives at spending level.
Distribution Substation Circuit Breakers	\$ 0.10	\$ 1.74	\$ 3.73	\$ 6.62	\$ 4.07	Increase	Increasing funding to address aging infrastructure.
Substation 69/12 kV Transformer Replacement	\$ -	\$ 2.39	\$ 4.52	\$ 5.13	\$ 4.75	Increase	Increasing funding to address aging infrastructure.
Protection and Control	\$ 0.02	\$ 0.30	\$ 0.26	\$ (0.03)	\$ 0.35	Increase	Increasing funding to address aging infrastructure.
Cross-Yard 12 kV Underground Ties	\$ -	\$ -	\$ -	\$ 0.14	\$ 0.66	Increase	Increasing funding to address aging infrastructure.
Replace Deteriorated/Failed Low-Tension Network Equipment and Structures	\$ 0.37	\$ 0.32	\$ 1.26	\$ 0.82	\$ 1.86	Increase	Increasing funding to address aging infrastructure.
Repair Failed 138/69 12 kV Transformers	\$ 0.58	\$ -	\$ -	\$ -	\$ -	Increase	Increasing funding to address aging infrastructure.
Distribution Substation DC Equipment	\$ -	\$ -	\$ 0.01	\$ 0.02	\$ 0.68	Increase	Increasing funding to address aging infrastructure.
Miscellaneous Substation Equipment	\$ -	\$ 0.00	\$ 0.67	\$ 0.85	\$ 3.53	Increase	Increasing funding to address aging infrastructure.
Substation Animal Guarding	\$ -	\$ 1.00	\$ 1.65	\$ 1.15	\$ 0.78	Increase	Increasing funding to reduce impactful substation outages.

P-8 Question - State if the PPL Safety Rule Book is provided to the employees of the Contractors hired by PPL Electric.

P-8 Response – PPL Electric does not provide a PPL Safety Rule Book to employees of contractors. However, PPL Electric requires that all contractors must adhere to OSHA Safety Standards while performing work for PPL Electric. Failure of a contractor to adhere to those standards would be grounds for PPL Electric to terminate the contract.