FirstEnergy

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

610-929-3601

September 16, 2013

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA UNITED PARCEL SERVICE

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

L-00030161

Re: Supplemental 2nd Quarter 2013 Reliability Report – West Penn Power Company

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code § 57.195(d) and (e), enclosed for filing on behalf of West Penn Power Company are two copies of the Supplemental 2nd Quarter 2013 Reliability Report. Please date stamp the additional copy and return it in the postage-prepaid envelope provided.

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

Sincerely,

David J. Karafa/ms

David J. Karafa
President, Pennsylvania Operations
(610) 921-6060
dkarafa@firstenergycorp.com

c: As Per Certificate of Service
D. Gill – Bureau of Technical Utility Services (via email and first class mail)
D. Searfoorce - Bureau of Technical Utility Services (via email and first class mail)

WestPenn Power
A FirstEnergy Company

Supplemental 2013 2nd Quarter Reliability Report

West Penn Power Company

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

Supplemental 2nd Quarter 2013 Reliability Report - West Penn Power Company

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[1].

Major Events

FirstEnergy Company	Customers Affected	Time and Duration of the Event		Cause of the Event	Commission Approval Status
West Penn Power	2,823	Duration	3 hours and 30 minutes	Transmission Outage	Approved August 21, 2013
		Start Date/Time	May 14, 2013 3:08 pm		
		End Date/Time	May 14, 2013 6:38 pm		

[1] For purposes of this report, all reliability reporting is based upon the Pennsylvania Public Utility Commission's definitions for momentary outages and major events pursuant to 52 Pa. Code § 57.192.

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[2] values are provided, the report shall also include the number of customer momentary interruptions.

Reliability Index Values

2Q 2013 (12-Mo Rolling)	West Penn Power		
	Benchmark	12-Month Standard	12-Month Actual
SAIFI	1.05	1.26	1.07
CAIDI	170	204	181
SAIDI	179	257	194
Customers Served[3]	706,788		
Number of Sustained Interruptions	11,352		
Customers Affected	754,131		
Customer Minutes	136,826,343		

[2] MAIFI values are not available

[3] 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-cased 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[4]

Outages by Cause				
2nd Quarter 2013 12-Month Rolling	West Penn Power			
Cause	Customer Minutes	Number of Sustained Interruptions	Customers Affected	% Based on Number of Outages
TREES/NOT PREVENTABLE	39,708,290	1905	123,702	29.02%
EQUIPMENT FAILURE	22,263,207	2448	155,030	16.27%
LINE FAILURE	15,770,202	981	71,330	11.53%
UNKNOWN	15,527,869	1963	104,851	11.35%
TREES OFF ROW-TREE	9,660,911	448	33,164	7.06%
FORCED OUTAGE	7,887,381	1129	115,295	5.76%
VEHICLE	6,674,810	361	51,922	4.88%
TREES/PREVENTABLE	4,125,020	204	8,688	3.01%
WIND	3,423,877	100	2,607	2.50%
ANIMAL	3,332,871	1078	34,066	2.44%
OTHER ELECTRIC UTILITY	1,598,519	8	4,421	1.17%
LIGHTNING	1,595,526	137	7,257	1.17%
TREES ON ROW	1,392,952	66	5,647	1.02%
TREES OFF ROW-LIMB	1,301,024	79	5,986	0.95%
HUMAN ERROR -NON-COMPANY	765,508	79	8,337	0.56%
BIRD	524,922	158	3,924	0.38%
HUMAN ERROR - COMPANY	507,926	32	8,225	0.37%
OVERLOAD	224,025	13	1,887	0.16%
PREVIOUS LIGHTNING	142,417	5	798	0.10%
CUSTOMER EQUIPMENT	135,396	38	953	0.10%
UG DIG-UP	70,040	34	485	0.05%
OBJECT CONTACT WITH LINE	63,451	15	1,055	0.05%
VANDALISM	57,576	13	4,340	0.04%
TREES - SEC/SERVICE	52,359	39	78	0.04%
FIRE	15,737	12	54	0.01%
OTHER UTILITY-NON ELEC	1,847	3	15	0.00%
CONTAMINATION	1,183	1	7	0.00%
ICE	777	2	2	0.00%
PLANNED OUTAGE	720	1	5	0.00%
Total	136,826,343	11,352	754,131	100.00%

[4] In May 2013, new outage cause codes were added to help better categorize tree related outages. Definitions of these codes are as follows:
Trees On ROW - An outage caused by tree that has grown into or contacted a West Penn Power primary within the distribution clearing zone
Trees Off ROW-Tree - An outage caused by tree that has fallen into a West Penn Power primary outside the distribution clearing zone
Trees Off ROW-Limb - An outage caused by tree limb that has fallen into a West Penn Power primary outside the distribution clearing zone
Trees - Sec/Service - An outage caused by tree that has grown into or contacted a West Penn Power secondary or service.

Proposed Solutions – West Penn Power

Trees/Not Preventable

West Penn Power's danger tree program consists of removing, or significantly reducing in height, dead, diseased or damaged trees located outside the boundary of the right-of-way that pose a threat to service reliability or the integrity of the line under any weather condition. In 2012, West Penn Power began a program targeting ash trees impacted by the Emerald Ash Borer. This will be an on going effort.

Equipment Failure

West Penn Power addresses equipment failures using a three-prong approach. The first step is to conduct pole by pole reviews of main line hardware and correct any deficiencies found. The second step is a review of the entire overhead circuit, visiting all locations on a six-year cycle. And the third step is conducting an engineering review and root cause analysis of all distribution circuit lockouts. The number of equipment failures is mitigated through these programs and the follow up corrective actions. In addition, the Engineering Department periodically conducts a multi-operation device review to identify causes and trends of equipment failures and other outage causes. Engineering then plans accordingly to repair or replace facilities.

Line Failure

West Penn Power addresses line failure caused outages using multiple strategies. Line failure is defined as outages attributable to overhead conductors and underground cables. Underground cables consist of direct-buried conductors and conductors in conduit, depending upon the vintage. Type and vintage of conductors (aluminum, steel reinforcing, copper, etc) can affect failure frequencies. Underground cables are inherently difficult to inspect, so West Penn Power tracks repeated outages in order to implement an underground cable replacement strategy. Overhead conductors are visually inspected every six years as part of the inspection and maintenance plan. Repeated failures are also tracked and a replacement strategy targets high failure sections. Programs, such as the Worst Performing Circuit Program and Circuit Lockout Root Cause Analysis Program are useful for monitoring these trends.

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 2013		West Penn Power		
		Planned	Completed	
		Annual	2Q	YTD
Forestry	Transmission (Miles)	513.30	127.86	149.66
	Distribution (Miles)	4,482	1,472	2,529
Transmission	Aerial Patrols	2	1	1
	Groundline	0	0	0
Substation	General Inspections	5,070	1,521	2,535
	Transformers	405	316	455
	Breakers	210	200	239
	Relay Schemes	133	0	72
Distribution	Capacitors	1,332	0	1,332
	Poles	38,701	9,762	16,404
	Reclosers	3,799	1,278	2,964
	Radio-Controlled Switches	West Penn Power has no radio-controlled switches.		

General Note:
Unless specified otherwise, all inspections are reported on a unit basis rather than on a location basis.

Section 57.195(e)(7): Quarterly and year-to-date information on budgeted versus actual transmission and distribution operations 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 Expenditures[5]

West Penn Power T&D O&M - 2Q/YTD June 2013						
	Category	Q2 Actuals	Q2 Budget	Q2 YTD Actuals	Q2 YTD Budget	Annual Budget
Transmission						
560	Operation Supervision & Engineering	0	0	(5)	0	0
561	Load Dispatching	613,392	699,575	1,394,394	1,548,451	2,918,008
562	Station Expenses	37,665	694,587	205,450	1,463,879	2,898,094
565	Transmission of Electricity by Others	5,654,289	5,683,501	10,539,682	10,842,943	24,306,181
566	Miscellaneous Transmission Expenses	33,910	36,384	83,160	108,660	194,763
567	Rents	2	425	2	425	2,867
568	Maintenance Supervision & Engineering	183,660	187,656	401,402	511,241	1,096,662
569	Maintenance of Structures	9,877	63,632	20,744	130,461	275,970
570	Maintenance of Station Equipment	307,115	(40,045)	492,662	(43,472)	(33,305)
571	Maintenance of Overhead Lines	1,406,783	213,547	2,666,422	432,286	864,563
572	Maintenance of Underground Lines	6,569	0	7,716	0	0
575	Market Administration, Monitoring & Compliance Services	11,082	18,000	36,033	45,000	45,000
Transmission Total		**8,264,343**	**7,557,264**	**15,847,661**	**15,039,873**	**32,568,804**
580	Operation Supervision & Engineering	115,266	18,804	138,679	47,629	433,774
581	Load Dispatching	267,705	309,218	617,373	620,368	1,298,802
582	Station Expenses	203,074	196,011	747,437	412,952	821,743
583	Overhead Line Expenses	271,451	80,561	726,213	170,967	341,463
584	Underground Line Expenses	322,366	259,750	510,443	400,210	870,000
586	Meter Expenses	202,318	184,024	463,256	463,990	940,886
588	Miscellaneous Distribution Expenses	2,605,871	1,609,738	4,185,190	3,222,479	6,848,491
590	Maintenance Supervision & Engineering	93,039	84,850	225,617	236,679	554,657
592	Maintenance of Station Equipment	635,483	563,278	1,208,140	1,440,899	3,195,787
593	Maintenance of Overhead Lines	3,905,104	5,794,135	6,214,899	10,986,863	22,015,105
594	Maintenance of Underground Lines	341,627	226,348	544,036	469,914	795,209
596	Maintenance of Street Lighting & Signal Systems	130,801	93,014	414,930	197,407	394,282
597	Maintenance of Meters	301,602	326,473	738,184	699,425	1,397,314
598	Maintenance of Miscellaneous Distribution Plant	75,464	368,374	148,499	766,657	1,596,881
Distribution Total		**9,471,169**	**10,114,576**	**16,882,897**	**20,136,438**	**41,504,393**
West Penn Power Grand Total		17,735,513	17,671,840	32,730,558	35,176,311	74,073,197

[5] 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 Expenditures[6]

West Penn Power T&D Capital - 2Q / YTD June 2013					
Category	**Q2 Actuals**	**Q2 Budget**	**Q2 YTD Actuals**	**Q2 YTD Budget**	**Annual Budget**
Capacity	2,374,695	2,167,377	4,748,689	5,655,317	6,509,414
Condition	1,501,282	1,631,056	3,402,205	3,394,623	7,358,313
Facilities	203,497	792	612,448	171,540	173,124
Forced	6,115,847	6,705,905	11,733,638	13,243,067	24,885,963
Meter Related	930,820	454,947	1,678,547	928,345	1,949,692
New Business	4,553,424	3,433,296	10,947,780	7,235,754	14,822,122
Other	1,081,902	4,815,577	587,038	9,066,343	19,375,572
Reliability	2,325,450	4,108,163	3,153,710	6,644,465	14,282,823
Street Light	59,416	253,492	506,877	802,374	1,282,956
Tools & Equipment	2,193,939	1,379,679	4,153,550	2,361,408	3,611,308
Vegetation Management	9,488,407	6,443,527	19,401,945	13,361,553	25,987,100
West Penn Power Total	30,828,680	31,393,811	60,926,427	62,864,787	120,238,387

[6] 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 2013					
Department	**Staff**	**1Q**[7]	**2Q**[8]	**3Q**	**4Q**
Line	Leader / Chief	79	76		
	Lineman	175	160		
Substation	Leader	14	14		
	Electrician	50	45		
	Total	**318**	**295**		

[7] These statistics were reported incorrectly in the first quarter report and have been revised.
[8] Seventeen retirements occurred during the second quarter of 2013.

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 2013 ($)					
	1Q	**2Q**	**3Q**	**4Q**	**Total**
West Penn Power	2,698,887	3,019,778			**5,718,665**

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 - 2013	
	West Penn Power
January	33%
February	29%
March	30%
April	28%
May	24%
June	23%

Call-out Response

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					
2013	**Total Call-Outs**	**Workers Accepting**	**Elapsed Time (Minutes)**	**Average Response Time per Crew Call-Out (Minutes)**	**Average Response Rate Per Workers Accepting (Minutes)**
April	832	691	3,044	3.66	4.41
May	1,091	778	4,289	3.93	5.51
June	1,222	864	4,885	4.00	5.65
2Q Total	3,145	2,333	12,218	3.88	5.24

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 Rate Per Workers Accepting = Elapsed Time divided by Workers Accepting

ATTACHMENT A

Worst Performing Circuits - Reliability Indices

West Penn Power												
Circuit Rank	Substation	Circuit Desc	District	Average Customers	Outages	Lockouts	Customer Minutes	Customers Affected	SAIDI Impact	SAIDI	SAIFI	CAIDI
1	Saint Thomas	Edenville	Mcconnellsburg	1164	47	1	2,610,385	3,165	3.69	2,243	2.72	825
2	Clearville	Clearville	Mcconnellsburg	620	40	1	1,841,544	1,061	2.60	2,970	1.71	1736
3	North Fayette	Beechcliff	Mcdonald	2239	25	0	1,622,686	4,091	2.29	725	1.83	397
4	Whitetail	Resorts	Mcconnellsburg	393	12	1	1,605,396	772	2.27	4,085	1.96	2080
5	Rutan	Windridge	Jefferson	1194	70	0	1,334,900	2,761	1.89	1,118	2.31	483
6	Henry Clay	Markleysburg	Uniontown	1081	39	1	1,252,286	5,206	1.77	1,158	4.82	241
7	Rutan	Bristoria	Jefferson	1213	53	0	1,217,675	3,730	1.72	1,004	3.08	326
8	Butler	Penn St	Butler	2671	36	2	1,184,072	6,739	1.67	443	2.52	176
9	Necessity	Gibbon Glade	Uniontown	491	25	0	1,169,893	1,277	1.65	2,383	2.60	916
10	Mercersburg	Cove Gap	Mcconnellsburg	881	32	1	1,014,934	1,453	1.43	1,152	1.65	699
11	Bedford Road	RT 220 North	Hyndman	787	20	0	967,461	2,154	1.37	1,229	2.74	449
12	Robbins	Greenock	Jeannette	1336	12	2	962,877	3,139	1.36	721	2.35	307
13	Waterville	Waterville	State College	355	18	1	948,502	1,102	1.34	2,672	3.10	861
14	North Union	Mount Vernon	Uniontown	900	14	3	938,573	6,348	1.33	1,043	7.05	148
15	Shaffers Corner	Seventh St Rd	Arnold	2093	29	2	896,635	6,262	1.27	428	2.99	143
16	Saint Thomas	Lemasters	Mcconnellsburg	382	27	1	827,205	715	1.17	2,165	1.87	1157
17	Saltsburg	Saltsburg	Arnold	1420	31	2	792,478	3,618	1.12	558	2.55	219
18	North Fayette	Tyre	Mcdonald	1463	29	2	771,069	4,225	1.09	527	2.89	183
19	South Union	York Run	Uniontown	1479	20	0	742,597	2,188	1.05	502	1.48	339
20	Karns City	Kaylor	Butler	1186	30	0	684,597	2,643	0.97	577	2.23	259
21	Fountaindale	Carroll Valley	Waynesboro	1217	53	1	672,470	3,355	0.95	553	2.76	200
22	Saint Thomas	Brandts Ch	Waynesboro	742	28	1	665,089	1,674	0.94	896	2.26	397
23	Necessity	Ohiopyle	Uniontown	844	40	0	659,969	1,295	0.93	782	1.53	510
24	Piney Fork	Gilhall	Charleroi	2031	24	1	613,047	5,039	0.87	302	2.48	122
25	Smithton	Yukon	Charleroi	1304	28	0	592,656	3,852	0.84	454	2.95	154
26	Elderton	Whitesburg	Kittanning	579	20	1	579,292	879	0.82	1,001	1.52	659
27	New Bethlehem	Clarion Rd	Clarion	1408	25	1	560,413	2,145	0.79	398	1.52	261
28	Huntingdon	Shawtown	Jeannette	1737	16	1	558,836	2,731	0.79	322	1.57	205
29	Kittanning	Cadogan	Kittanning	980	13	1	525,890	1,892	0.74	537	1.93	278
30	Crossgates	Robinhood	Boyce	925	14	1	525,163	1,633	0.74	568	1.77	322

General Note:
MAIFI values are not available

West Penn Power												
Circuit Rank	Substation	Circuit Desc	District	Average Customers	Outages	Lockouts	Customer Minutes	Customers Affected	SAIDI Impact	SAIDI	SAIFI	CAIDI
31	Shaffers Corner	Stewart School	Arnold	2003	13	2	512,376	6,156	0.72	256	3.07	83
32	Vandergrift	Roaring Run	Arnold	949	35	1	509,662	1,553	0.72	537	1.64	328
33	Normalville	Mill Run	Pleasant Valley	578	14	1	479,308	807	0.68	829	1.40	594
34	Weedville	Weedville	St Marys	1365	25	0	477,592	2,367	0.67	350	1.73	202
35	Houston	McGovern	Washington	1576	36	0	475,585	2,846	0.67	302	1.81	167
36	Peters	McMurray	Boyce	1385	16	1	472,975	2,185	0.67	342	1.58	216
37	Avella	W Middletown	Washington	1137	41	0	465,449	1,900	0.66	409	1.67	245
38	Charleroi	Speers	Charleroi	1460	24	1	462,795	2,376	0.65	317	1.63	195
39	Eastgate	East Greensburg	Jeannette	2095	21	2	457,349	6,965	0.65	218	3.32	66
40	Crooked Creek	Crooked Creek	Kittanning	477	7	0	451,507	978	0.64	947	2.05	462

General Note:
MAIFI values are not available

ATTACHMENT B

Worst Performing Circuits – Remedial Actions

West Penn Power					
Rank	**Substation**	**Circuit**	**Remedial Actions Planned or Taken**	**Status of Remedial Work**	**Date Remedial Work Completed**
1	SAINT THOMAS	EDENVILLE	*48% of the CMI was due to non-preventable trees and 44% was due to preventable trees. The majority of the total CMI occurred during Hurricane Sandy.*		
			A CEMI analysis was performed and any tap exceeding the threshold will be reviewed for possible additional mitigation.	Complete	Jan-13
2	CLEARVILLE	CLEARVILLE	*57% of the CMI was due to non-preventable trees and 33% was due to a line failure.*		
			Cycle tree trimming.	To be completed 2013	
3	NORTH FAYETTE	BEECHCLIFF	*69% of the CMI was due to non-preventable trees, 14% was due to line failure and 13% was due to forced outages.*		
			On-cycle circuit inspection.	To be completed 2013	
4	WHITETAIL	RESORTS	*58% of the CMI was due to unknown causes, 21% was due to non-preventable trees and 17% was due to preventable trees. 36% of the total CMI was due to Hurricane Sandy.*		
			A CEMI analysis was performed and any tap exceeding the threshold will be reviewed for possible additional mitigation.	Complete	Jan-13
5	RUTAN	WINDRIDGE	*66% of the CMI was due to non-preventable trees and 18% was due to unknown causes.*		
			Circuit reviewed for main line hardware issues.	Complete	Nov-12
			Cycle tree trimming.	To be completed 2013	
6	HENRY CLAY	MARKLEYSBURG	*35% of the CMI was due to non-preventable trees and 35% was due to line failure.*		
			Cycle tree trimming.	Complete	Nov-12
7	RUTAN	BRISTORIA	*31% of the CMI was due to non-preventable trees, 32% was due to equipment failure and 12% was due to damage caused by vehicles.The majority of the total CMI occurred during minor storm event.*		
			Cycle tree trimming.	Complete	Nov-12

West Penn Power					
Rank	**Substation**	**Circuit**	**Remedial Actions Planned or Taken**	**Status of Remedial Work**	**Date Remedial Work Completed**
8	BUTLER	PENN ST	*75% of the CMI was due to equipment failure and 13% was due to damage caused by vehicles.*		
			Main line SAIFI hardware review.	To be completed 2013	
9	NECESSITY	GIBBON GLADE	*68% of the CMI was due to non-preventable trees and 23% was due to a line failure.*		
			Cycle tree trimming.	To be completed 2013	
10	MERCERSBURG	COVE GAP	*70% of the CMI was to due non-preventable trees and 11% was due to line failure. The majority of the total CMI occurred during Hurricane Sandy.*		
			Cycle tree trimming.	Complete	Dec-12
11	BEDFORD ROAD	RT 220 NORTH	*80% of the CMI was due to non-preventable trees and 11% was due to unknown causes.*		
			Cycle tree trimming.	To be completed 2013	
12	ROBBINS	GREENOCK	*75% of the CMI was due to non-preventable trees and 21% was due to unknown causes.*		
			Zone 1 forestry review planned to note and correct any tree and hardware issues.	To be completed 2013	
13	WATERVILLE	WATERVILLE	*86% of the CMI was due to other electric utility and 10% was due to non-preventable trees.*		
			Circuit is fed by foreign utility. Alternate supply options limited. Considered distributed generation as alternate feed option. Install circuit monitoring.	Complete	Sep-12
			Circuit reviewed for main line hardware issues.	Complete	Aug-12
			Zone 1 danger tree work	Complete	Dec-12

West Penn Power					
Rank	**Substation**	**Circuit**	**Remedial Actions Planned or Taken**	**Status of Remedial Work**	**Date Remedial Work Completed**
14	NORTH UNION	MOUNT VERNON	*56% of the CMI was due to line failure and 38% due to damage caused by vehicles .*		
			Cycle tree trimming.	Complete	Mar-13
			Main line SAIFI hardware review.	To be completed 2013	
15	SHAFFERS CORNER	SEVENTH ST RD	*38% of the CMI was due to non-preventable trees and 48% was due to equipment failure. The majority of the total CMI occurred during minor storm event.*		
			Zone 1 tree trimming.	Complete	Jun-12
			Cycle tree trimming.	To be completed 2014	
16	SAINT THOMAS	LEMASTERS	*95% of the CMI was due to non-preventable trees of which 65% occurred during Hurricane Sandy.*		
			A CEMI analysis was performed and the circuit has no outage issues beyond the major storms.	Complete	Feb-13
17	SALTSBURG	SALTSBURG	*52% of the CMI was due ton-preventable trees and 40% was due to equipment failure.*		
			Zone 1 forestry review planned to note and correct any tree and hardware issues.	To be completed 2013	
18	NORTH FAYETTE	TYRE	*70% of the CMI was due to non-preventable trees and 12% was due to line failure. The majority of the total CMI occurred during minor storm event.*		
			Cycle tree trimming.	Complete	Dec-12
19	SOUTH UNION	YORK RUN	*28% of the CMI was due to non-preventable trees and 65% was due to equipment failure.*		
			Cycle tree trimming.	Complete	Jun-13

West Penn Power					
Rank	**Substation**	**Circuit**	**Remedial Actions Planned or Taken**	**Status of Remedial Work**	**Date Remedial Work Completed**
20	KARNS CITY	KAYLOR	*25% of the CMI was due to non-preventable trees, 20% due to damage caused by vehicles and 37% was due to line failure. The majority of the total CMI occurred during minor storm event.*		
			Cycle tree trimming.	Complete	Dec-12
21	FOUNTAINDALE	CARROLL VALLEY	*69% of the CMI was due to non-preventable trees and 14% was due to equipment failure.*		
			Zone 1 forestry review planned to note and correct any tree and hardware issues.	To be completed 2013	
22	SAINT THOMAS	BRANDTS CH	*55% of the CMI was due to non-preventable trees, 23% due to preventable trees and 17% was due to unknown causes. The majority of the total CMI occurred during Hurricane Sandy.*		
			Cycle tree trimming.	Complete	Dec-12
23	NECESSITY	OHIOPYLE	*30% of the CMI was due to non-preventable trees and 55% due to line failure.*		
			Circuit reviewed for main line hardware issues.	Complete	Nov-12
			Cycle tree trimming.	Complete	Jun-12
			Main line SAIFI hardware review.	To be completed 2013	
24	PINEY FORK	GILLHALL	*44% of the CMI was due to equipment failure, 26% due to forced outage and 24% due to non-preventable trees.*		
			Main line SAIFI hardware review.	To be completed 2013	
25	SMITHTON	YUKON	*12% of the CMI was due to non-preventable trees, 18% due to forced outage, 36% due to damage caused by vehicles and 26% was due to line failure.*		
			No additional actions are planned for 2013.		
26	ELDERTON	WHITESBURG	*36% of the CMI was due to preventable trees, 34% due to non-preventable trees and 21% due to unknown causes.*		
			No additional actions are planned for 2013.		

West Penn Power					
Rank	**Substation**	**Circuit**	**Remedial Actions Planned or Taken**	**Status of Remedial Work**	**Date Remedial Work Completed**
27	NEW BETHLEHEM	CLARION RD	*77% of the CMI was due to non-preventable trees and 8% was due to line failure.*		
			Zone 1 forestry review planned to note and correct any tree and hardware issues.	To be completed 2013	
28	HUNTINGDON	SHAWTOWN	*74% of the CMI was due to non-preventable trees and 14% was due to forced outages..*		
			Main line SAIFI hardware review.	To be completed 2013	
29	KITTANNING	CADOGAN	*52% of the CMI was due to non-preventable trees and 26% was due to equipment failure.*		
			Cycle tree trimming.	Complete	Dec-12
30	CROSSGATES	ROBINHOOD	*74% of the CMI was due to non-preventable trees and 24% was due to unknown causes.*		
			Cycle tree trimming.	Complete	Dec-12
			Main line SAIFI hardware review.	To be completed 2013	
31	SHAFFERS CORNER	STEWART SCHOOL	*38% of the CMI was due to forced outage, 29% due to unknown causes and 25% due to damage caused by vehicles.*		
			Zone 1 forestry review planned to note and correct any tree and hardware issues.	To be completed 2013	
32	VANDERGRIFT	ROARING RUN	*92% of the CMI was due to non-preventable trees.*		
			Zone 1 forestry review planned to note and correct any tree and hardware issues.	To be completed 2013	
33	NORMALVILLE	MILL RUN	*99% of the CMI was due to non-preventable trees.*		
			Cycle tree trimming.	Complete	Dec-12

West Penn Power					
Rank	**Substation**	**Circuit**	**Remedial Actions Planned or Taken**	**Status of Remedial Work**	**Date Remedial Work Completed**
34	WEEDVILLE	WEEDVILLE	*85% of the CMI was a result of non-preventable trees.*		
			Zone 1 danger tree and equipment patrol.	Complete	Jun-13
35	HOUSTON	MCGOVERN	*57% of the CMI was a result of non-preventable trees and 23% was due to equipment failure.*		
			Zone 1 danger tree work	Complete	Dec-12
			Follow up hardware corrections as a result of hardware review.	To be completed 2013	
36	PETERS	MCMURRAY	*82% of the CMI was a result of non-preventable trees.*		
			Cycle tree trimming.	Complete	Dec-12
			Zone 1 forestry review planned to note and correct any tree and hardware issues.	To be completed 2013	
37	AVELLA	W MIDDLETOWN	*23% of the CMI was a result of unknown causes, 29% due to preventable trees and 22% due to non-preventable trees.*		
			No additional actions are planned for 2013.		
38	CHARLEROI	SPEERS	*58% of the CMI was due to preventable trees and 33% was due to equipment failure.*		
			Cycle tree trimming.	Complete	Dec-12
39	EASTGATE	EAST GREENSBURG	*37% of the CMI was due to forced outages, 21% due to equipment failure and 40% was due to damage caused by animals.*		
			Zone 1 forestry review planned to note and correct any tree and hardware issues.	To be completed 2013	

West Penn Power					
Rank	**Substation**	**Circuit**	**Remedial Actions Planned or Taken**	**Status of Remedial Work**	**Date Remedial Work Completed**
40	CROOKED CREEK	CROOKED CREEK	*93% of the CMI was due to non-preventable trees.*		
			Cycle tree trimming.	Complete	Dec-12
	SALTSBURG	AVONMORE	*75% of the CMI was due to non-preventable trees and 13% was due to forced outage.*		
			Cycle tree trimming.	To be completed 2013	
	DUTCH FORK	W ALEXANDER	*59% of the CMI was due to non-preventable trees.*		
			Cycle tree trimming.	To be completed 2013	
	BETHLEN	DARLINGTON	*70% of the CMI was due to non-preventable trees mostly during storm events.*		
			Zone 1 danger tree work	Complete	Oct-12
			Main line SAIFI hardware review.	To be completed 2013	
	BETHLEN	WILPEN	*57% of the CMI was due to wind and 22% was due to non-preventable trees.*		
			On-cycle circuit inspection.	Complete	Dec-12
			Cycle tree trimming.	To be completed 2013	
	MERRITTSTOWN	REPUBLIC	*47% of the CMI was due to non-preventable trees and 20% was due to line failure.*		
			Cycle tree trimming.	To be completed 2013	
			Main line SAIFI hardware review.	To be completed 2013	

West Penn Power					
Rank	**Substation**	**Circuit**	**Remedial Actions Planned or Taken**	**Status of Remedial Work**	**Date Remedial Work Completed**
	VESTABURG	MEXICO	*62% of the CMI was due to non-preventable trees.*		
			Cycle tree trimming.	To be completed 2013	
	NORTH UNION	GALLATIN	*60% of the CMI was due to unknown causes.*		
			Cycle tree trimming.	To be completed 2013	
	VESTABURG	LOW HILL	*83% of the CMI was due to unknown causes.*		
			Cycle tree trimming	To be completed 2013	
	SILVERVILLE 138-12	HARRISON	*39% of customer interruptions was due to lightning, 28% was due to unknown caused outages and 15% was due to wind.*		
			Cycle tree trimming	To be completed 2013	
	QUINCY	SOUTH MOUNTAIN	*85% of customer interruptions were due to trees.*		
			Circuit reviewed for main line hardware issues.	Complete	Nov-12
			Cycle tree trimming	To be completed 2013	
	GRAND POINT	SCOTLAND	*28% of customer interruptions was due to trees and 56% was due to line failure.*		
			Circuit reviewed for main line hardware issues.	Complete	Nov-12
			Cycle tree trimming	To be completed 2013	
	SALTSBURG	SALINA	*37% of customer interruptions was due to trees and 41% was due to equipment failure.*		
			Cycle tree trimming	To be completed 2013	

ATTACHMENT C

West Penn Power's Compliance with Terms of the July 20, 2006 Reliability Settlement

Item	Description	Compliance Status
2a.	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.	Commitment completed.
2b.	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. 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.	Commitment implemented.
2c.	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.	Commitment completed.
3.	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). 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.	Commitment completed.
4a. 1-3	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: 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.

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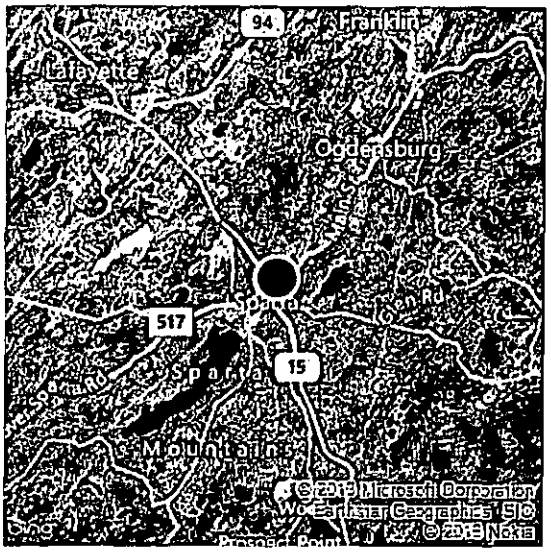

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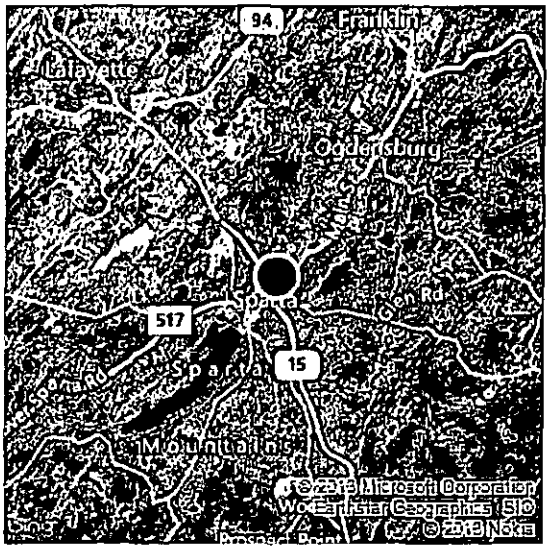

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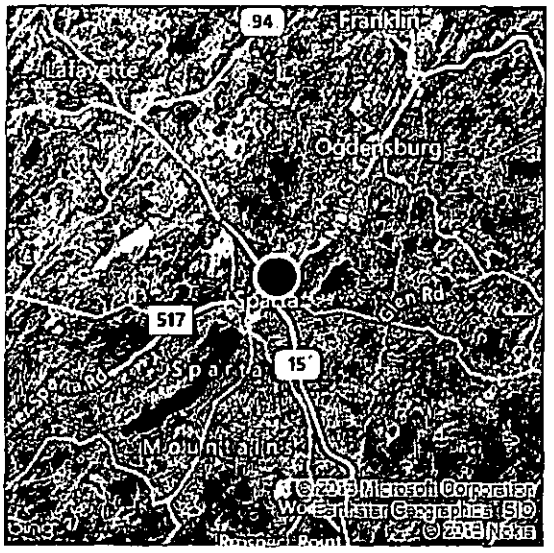

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