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Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

May 6, 2014

Re: Advance Notice of Proposed Rulemaking for Revision of 52 Pa. Code Chapter 57 Relating to Inspection Requirements for Automatic Splices; L-2014-2400191

Docket No. C-2012-2307244

This document is being sent in response to the Pennsylvania PUC's solicitation of comments from EDCs and other interested parties that address whether existing regulations in 52 Pa. Code, Chapter 57, relating to electric distribution reliability should be amended to require regular inspections of automatic splices using infrared technology or any other necessary changes related to this matter.

Please do not hesitate to contact us if you have any questions or if you would like to schedule a meeting.

Regards,

Chris Costanzo



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For Connector Repair Why ClampStar Is Superior to Any Other Method

Most people do not understand the intended application for most compression connectors, and even fewer understand the ANSI C119 ratings for compression splice applications. It is important to understand these, so we will address them initially.

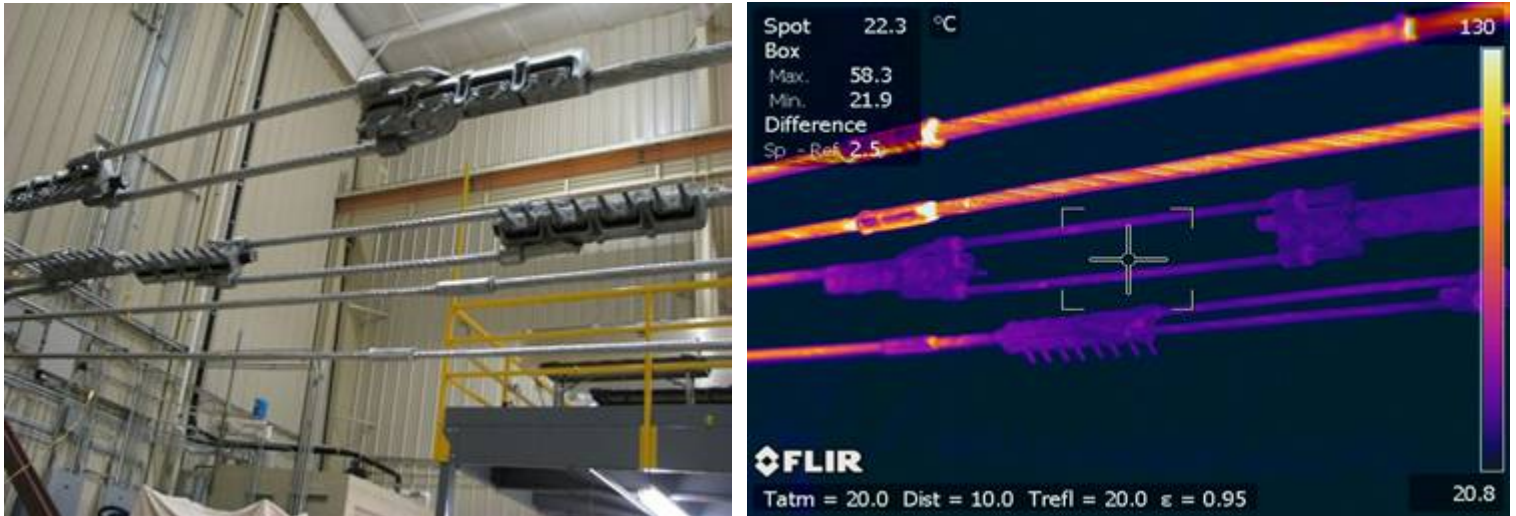
First, ANSI C119.4 is the predominant connector standard in North America for connectors for use in utility applications. The title of the standard is: ***ANSI C119.4 American National Standard For Electric Connectors — Connectors for Use Between Aluminum-to-Aluminum, and Aluminum-to-Copper Conductors Designed for Normal Operation at or Below 93°C and Copper-to-Copper Connectors Designed for Normal Operation at or Below 100°C.*** This standard has two common Class ratings, Class “A” and Class “AA” (commonly read “class double-A”). 98% of the connectors available are rated “Class A” and very few are rated Class “AA” and the difference is important.

- **Class “A”** is a test protocol for determining the suitability of a connector for application on *NEW – UNWEATHERED conductor*, operating at a maximum conductor temperature of **93°C (200°F)**.
- **Class “AA”** is intended to qualify a connector for use on *AGED – WEATHERED conductor*, also with the maximum conductor operating temperature limitation of **93°C (200°F)**.

Because we are comparing compression connectors to ClampStar, and are therefore focused on applications on *AGED – WEATHERED conductor*, it is prudent to understand that the difference in the qualification for Class “AA” is based on a higher temperature test protocol, 500 cycles at 175°C (347°F) rise above ambient, compared to the lesser Class “A” qualification of 500 cycles at only 100°C (212°F) rise above ambient. NOTE: The Class “AA” rating does not qualify a connector for use at higher temperatures (above 93°C) conductor operating temperature. ClampStar is designed and intended for use on *AGED – WEATHERED conductor*, and is subjected to cyclical testing at **390°C (734°F)**. Subjecting ClampStar to this significantly higher temperature test protocol not only qualifies it for application on *AGED – WEATHERED conductor*, but also for application on high temperature conductors operating as high as 250°C (482°F), presently the highest rated conductor temperature in the industry.

This testing is performed using the ClampStar as the connector, with the conductor ends terminated in each end of the unit – with no connector within, carrying the full current and tension load.





No connector in the industry today provides the superior performance of ClampStar, with the exception of a thermal fusion weld – not very practical for overhead splicing applications! ClampStar has NO AMPACITY limitation, as its current rating is above the melting point of the largest conductor a given size ClampStar can accommodate!

Thus, the superior performance of ClampStar trumps with these additional benefits:

- Longevity – permanent application
- Highest Thermal performance – system ampacity uprating applications – NO current limitations
- Easiest Installation – No requirement to pull up tension
- Fastest Installation – Typical Distribution Application less than 5 minutes – Typical Transmission less than 10 minutes!
- Easiest and Quickest combine to make ClampStar the *least expensive* solution
- Safer due to minimal exposure time of linemen in the Live Line Environment
- No Outage Required – easily installed on energized lines
- Easily installed with Hot Stick method – OR – Glove Method on energized lines
- Readily and quickly installed by helicopter
- Torque Nuts eliminate need for special tools / torque wrenches – no dies or press tools required
- Fits a range of conductor sizes
- Is properly rated and tested for the application on aged-weathered conductors
- Prefilled with the proper inhibitor compound – no guesswork, no mess
- Easy to inspect for proper installation. No concern for partial insertion errors or improper dies, or dies not fully closed, proper torque applied to fasteners clearly indicated by sheared torque nuts

