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September 30, 2016

**VIA HAND DELIVERY**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

M-2009-2094773

**RE: Biennial Inspection, Maintenance, Repair and Replacement Plan of Wellsboro Electric Company for the Period of January 1, 2018, through December 31, 2019**

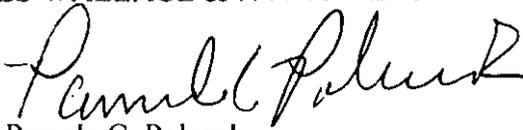
Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission are the original and three (3) copies of the Biennial Inspection, Maintenance, Repair and Replacement Plan of Wellsboro Electric Company for the Period of January 1, 2018, through December 31, 2019.

As shown on the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of these documents, and kindly return them for our filing purposes.

Very truly yours,

McNEES WALLACE & NURICK LLC

By   
Pamela C. Polacek

Counsel to Wellsboro Electric Company

Enclosures

c: Certificate of Service

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**Biennial Inspection, Maintenance, Repair and Replacement Plan  
Of Wellsboro Electric Company  
For the period of January 1, 2018- December 31, 2019**

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**Section 57.198 (b). Plan Consistency.** The plan must be consistent with the National Electrical Safety Code, Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Regulatory Commission Regulations and the Provisions of the American National Standards Institute, Inc.

**Program Description**

Wellsboro Electric Company will ensure that all work conducted pursuant to its Biennial Inspection, Maintenance, and Replacement Plan be performed consistent with the National Electrical Safety Code, Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission Regulations and the provisions of the American National Standards Institute, Inc., as applicable to the work performed.

**Section 57.198 (m). Recordkeeping.** An EDC shall maintain records of its inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair, and replacement programs as required by subsection (n). The records shall be made available to the commission upon request within 30 days. Examples of Sufficient records include:

- (1) Date Stamped records signed by EDC staff that performed the tasks related to the inspection.
- (2) Maintenance, repair, and replacement receipts from independent contractors; and/or
- (3) Equivalent computer based records indicating the nature of the work performed.

**Program Description**

Wellsboro Electric Company will maintain records of its inspection and maintenance activities in the form of:

- (1) Date Stamped paper records signed by Wellsboro Electric staff;
- (2) Maintenance, repair, and replacement receipts from independent contractors; and/or
- (3) Equivalent computer based records indicating the nature of the work performed.

**Section 57.198 (n) (1). Vegetation Management.** The minimum inspection and treatment cycle for vegetation management shall be between 4-8 years for overhead distribution facilities. An EDC shall submit a condition based plan for vegetation management for its overhead distribution system facilities explaining its treatment cycle.

**Program Description**

Wellsboro Electric Company has eight distribution circuits on its system. The total miles of overhead primary line on these circuits is approximately 466 miles. The circuits are all located in Tioga County in Pennsylvania, in the Borough of Wellsboro and Townships of Charleston, Delmar and Middlebury.

**Inspection Plan**

Wellsboro will perform a vegetation management inspection on all its primary overhead distribution plant every two years. Four circuits will be inspected each year. The purpose of the vegetation management inspection is to assess the condition of vegetation on and off right of way to indentify situations that may pose a threat to reliability and operation of the distribution system.

**Inspection Schedule for 2018 and 2019**

**2018**

Dresser Circuit – 92 Miles

Stony Fork Circuit – 122 Miles

East Ave. Circuit – 33 Miles

East/West Main Circuit – 37 Miles

**2019**

Charleston #1 and #2 Circuit – 132 Miles

Middlebury Circuit – 55 Miles

Osram Circuit – 1 Mile

## **Treatment Plan**

For 2018 and 2019, Wellsboro Electric plans to perform vegetation management trimming and chemical application where applicable on approximately 120 miles of overhead distribution line in the rural area of our system. In addition, working in conjunction with the Borough of Wellsboro Shade Tree Commission, we will perform selective trimming on various parts of the urban system each year based on inspections performed by the Shade Tree Commission and/or Wellsboro Electric.

### **Trimming and Chemical Applications areas for 2018 and 2019**

#### **2018**

60 Miles of Distribution Line

Selective trimming on East/West Main Circuit and East Ave Circuit

#### **2019**

60 Miles of Distribution Line

Selective trimming on East/West Main Circuit and East Ave. Circuit

### **Justification**

Wellsboro Electric's Management Plan complies with 52 Pa. Code Chapter 57 Section 57.198 (n) (1). No waiver is being requested.

**Section 57.198 (n) (2). Pole Inspections,** Distribution poles shall be inspected as 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 unauthorized backfilling or excavation near the pole
- (iv) Visual inspection for signs of lightning strikes
- (v) A load Calculation

**Program Description**

Wellsboro Electric will inspect all distribution poles on a 10 year cycle. All poles will be inspected for decay, damage, and illegal attachments, potential hazards associated with the electrical equipment and to insure that all applicable NESC codes are being met. Wellsboro proposed to use either the traditional sound and bore methods or the sonic wave method, with either method if the pole is suspected of internal decay with then be inspected below grade, if the remaining strength of the pole is found to be deficient, the pole will be classified as a reject pole (a pole that fails the ground line inspection but does not meet the definition found in Section 57.198 (n) (3) of the Pennsylvania Code, Title 52), a re-enforceable reject pole (a pole that can be restored to an acceptable strength when re-enforced with a steel truss or similar device), or a danger pole (danger poles meet the definition found in section 57.198 (n) (3) of the Pennsylvania Code, Title 52).

Wellsboro Electric will replace all poles that meet the definition found in Section 57.198 (n) (3) within 30 days of the date of inspection either by in-house or contract crews.

Wellsboro has approximately 14,000 poles on the distribution system and proposes to inspect 1400 poles per year.

**2018 and 2019 pole inspections planned**

**2018 – 1400 Poles**

**2019 – 1400 Poles**

Wellsboro Electric is requesting an exemption from the load calculation portion of this requirement.

**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 transformer.
- (iii) Other conditions that may adversely affect the operation of the overhead distribution line.

**Program Description**

Wellsboro Electric will conduct inspections of its overhead distribution facilities by ground patrol every two years. The purpose of the inspection is to verify that the overhead facilities are in a safe, operational, and reliable condition. The inspections will be conducted either by a trained company representative or a contract service. The inspection will be documented and if problems are found that information will be forwarded to the Engineering and Operations Department for further action.

**Overhead Line Inspections for 2018 and 2019**

**2018**

Middlebury Circuit

Dresser Circuit

East Ave. Circuit

East/West Main Circuit

**2019**

Charleston # 1 Circuit

Charleston # 2 Circuit

Stony Fork Circuit

Osram Circuit

Wellsboro Electric's Overhead Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (4). No waiver is being requested.

**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 the date of discovery.

**Program Description**

Any deficiencies found on Wellsboro Electric's overhead distribution system discovered during the Distribution Overhead Line Inspection will be addressed based on the severity of the situation. Those items that may affect the integrity of the circuits will be repaired or replaced within 30 days of discovery. All safety items will be addressed immediately by Wellsboro Electric crews or contracted crews as needed.

**Justification**

Wellsboro Electric's Overhead Line Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (5). No waiver is being requested.

**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 mount 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) Installations 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**

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

Wellsboro Electric will inspect all of its pad mount transformers on a five-year cycle, Wellsboro has no below grade transformers on the system, the purpose of the inspection is to verify that all transformers are in a safe, operational, and reliable condition. The inspection will look for rust, dents and other evidence of contact, leaking oil, and installations of fences and shrubbery that could affect the operation or maintenance of the unit. Unauthorized excavations and changes in grade near the transformer, and any other conditions that may affect it will also be inspected.

Inspection information will be documented. Conditions that require follow up will be forwarded to the Engineering and Operations department for corrective action. Safety issues will be addressed immediately.

This work may be performed by trained company personnel or by contact personnel.

**2018 and 2019 Overhead Transformer Inspections**

**2018**

Middlebury Circuit

Dresser Circuit

East Ave. Circuit

East/West Main Circuit

**2019**

Charleston #1 Circuit

Charleston #2 Circuit

Osram Circuit

Stony Fork Circuit

**Pad mount transformer inspections**

**2018**

Stony Fork Circuit

**2019**

Charleston #1 Circuit

Wellsboro Electric's Transformer Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (6). No waiver is being requested.

**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 distribution line inspection Plan.

**Program Description**

Wellsboro Electric will inspect all of its three phase and single phase reclosers on a one year cycle or less.

The purpose of performing the inspection is to ensure continued safe and reliable operations of the reclosers. The inspection will be conducted by a trained employee of Wellsboro Electric. The inspection will check for physical damage, oil leaks, and any other condition that would affect the operation of the recloser.

Inspection information will be documented. Conditions that require follow up will be forwarded to the Engineering and Operations department for corrective accident. Safety related issues will be corrected immediately. All other issues will be handled based on the severity of the issue.

**Inspection Plan**

Three Phases – Inspected annually total of ten.

Single Phase – Inspected annually total of twenty.

Wellsboro Electric's Recloser Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (7). No waiver is being requested.

**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**

Wellsboro Electric will inspect all of its distribution substations on a cycle of five weeks or less. The inspections will be conducted by a qualified company representative. The inspector will look for any physical damage, unsafe conditions, or potential problems with the substation equipment, structures and hardware. Loading and any status alarms will be recorded.

Inspection information will be recorded on a standard company substation inspection form. Conditions that require a follow up will be forwarded to the operations and engineering department for corrective action. Any safety related items will be corrected immediately.

A perimeter check of the property and fence will also be conducted to ensure the proper signage is present.

**Inspection Plan**

**2018**

Austin St. Substation – 12 Inspections

Buena Vista Substation – 12 Inspections

Buena Vista Hill Top Substation – 12 Inspections

**2019**

Austin St. Substation – 12 Inspections

Buena Vista St. Substation – 12 Inspections

Buena Vista St. Hill Top Substation – 12 Inspections

**Justification**

Wellsboro Electric's Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (8). No waiver is being requested.

**CERTIFICATE OF SERVICE**

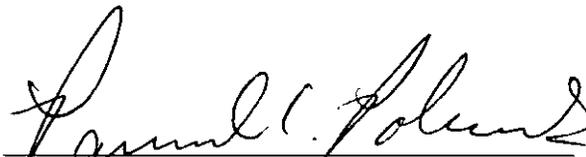
I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA FIRST CLASS MAIL**

Office of Small Business Advocate  
Suite 202, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120

Office of Consumer Advocate  
555 Walnut Street  
Forum Place - 5th Floor  
Harrisburg, PA 17101-1921



Pamela C. Polacek

Counsel to Wellsboro Electric Company

Dated this 30<sup>th</sup> day of September, 2016, at Harrisburg, Pennsylvania.

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