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November 28, 2016

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Filing Room
Harrisburg, PA 17120

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In re: PIKE COUNTY LIGHT & POWER COMPANY'S BIENNIAL INSPECTION,
MAINTENANCE, REPAIR AND REPLACEMENT PLAN (PUBLIC
VERSION)

M-2009-2094773

Dear Secretary Chiavetta:

Enclosed you will find Pike County Light & Power Company's ("PCL&P") Biennial Inspection, Maintenance, Repair and Replacement Plan (Public Version). Please note that on November 14, 2016, PCL&P filed a Confidential Version of this plan. PCL&P was subsequently contacted by the Bureau of Technical Utility Services ("BTUS") requesting that PCL&P file a public version. This public version, with the confidential material redacted, is being filed in compliance with BTUS' request.

Should you have any questions or comments, please feel free to contact me directly.

Very truly yours,



Thomas J. Sniscak
Whitney E. Snyder

TJS/WES/jld
Enclosure

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

For the Period of January 1, 2018 – December 31, 2019

Submitted by:

Steven L. Grandinali
General Manager
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§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") primarily has two 34.5kv feeds into the service territory and two main 13.2kv distribution circuits; the total overhead primary mileage is approximately 107.0 miles. The circuits are located within Pike County, Pennsylvania. PCL&P maintains this system on a three to five-year vegetation maintenance cycle. In 2015, the next cycle was extended to a five year cycle, to comply with the rate case settlement decision (Docket No. R -2013-2397237).

Treatment Plan:

The PCL&P distribution vegetation maintenance treatment plan is to maintain fully the entire system within each five -year period. The entire 107.0 miles was last maintained in 2012. The two, main 34.5kv feeds were completed in 2015 and 2016 respectively. The two, 13.2kv main distribution circuits were completed in 2012.¹

In between the vegetation maintenance cycles, spot vegetation treatment is completed as conditions are identified 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 daily using the Orange and Rockland Outage Management System. This monitoring allows the 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-five-years for the system. The treatment cycle for each circuit is shown in the table below:

	Pike County Light and Power Distribution Vegetation Management	
	Circuit	Expected Treatment Cycle
Matamoras	104-1	5 years
	104-2	5 years
Line 7, 5-10-34	Line 7 & 5-10-34, 3-1-34	3 years

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.

¹ Customers served on circuit 6-8-13 and circuit 3-1-34, will be scheduled with Orange and Rockland Utilities, Inc. vegetation maintenance plan for New York, where these circuits originate.

§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 525 and 350 poles will be inspected respectively per year in 2018 and 2019. 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 Company's General Manager. 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)	
	2018	2019
PCL&P	525	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 continuation of the waiver for the requirement, set forth in §57.198(n)(2)(vi), 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. Accordingly, a requirement to perform load calculations as part of the pole inspection program is not warranted. PCL&P's Vegetation Management Plan meets all the requirements of 52 Pa Code Chapter 57 §57.198(n)(2)(i) through (v).

§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 four categories: priority reject, reject, priority restorable and restorable. 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.

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§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.*

[REDACTED]

[REDACTED]

[REDACTED]

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.*

[REDACTED]

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. The 2016 program was originally scheduled for the 4th quarter and was not completed. The 2016 program will be completed in 2017 and commence in 2019. 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.*

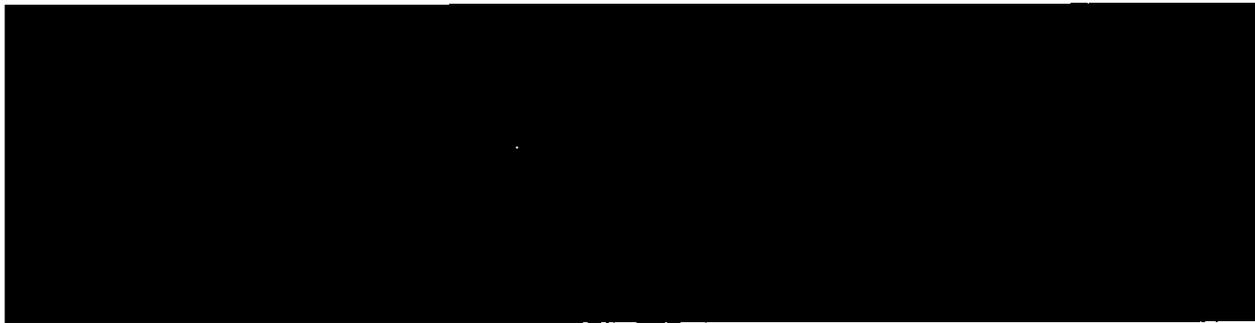
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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.

2 [Redacted]
[Redacted]

§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.

[REDACTED]

[REDACTED]

[REDACTED]

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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Justification

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