

From: **Eric Epstein** lechambon@comcast.net  
Subject: Comments of Eric Joseph Epstein  
Date: September 20, 2017 at 5:17 PM  
To: Eric Email lechambon@comcast.net



**Before the  
Pennsylvania Public Utility Commission**

September 27, 2017

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

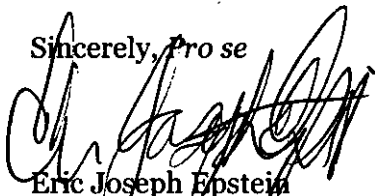
**Comments of Eric Joseph Epstein**

**RE: Petition of PPL Electric Utilities Corporation for  
Approval of its Long-Term Infrastructure Improvement  
Plan for the period January 1, 2018 to December 31,  
2022; Docket #P-2017-2622393**

Dear Secretary Chiavetta:

Enclosed please find for filing with the Pennsylvania Public Utility Commission  
the comments of Eric Joseph Epstein in the above-referenced proceeding.

Sincerely, *pro se*

  
Eric Joseph Epstein  
4100 Hillsdale Road  
Harrisburg, PA 17112

**RECEIVED**

SEP 20 2017

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

cc: Certificate of Service via electronic mail.

From: Eric Epstein epstein@efmr.org  
Subject: Fwd: LTIP, Docket #, P-2017  
Date: September 14, 2017 at 12:37 PM  
To: Eric Email lechambon@comcast.net



Begin forwarded message:

**From:** Eric Epstein <epstein@efmr.org>  
**Date:** September 14, 2017 9:20:56 AM EDT  
**To:** Christopher Wright <cwright@postschell.com>, "Darryl A. Lawrence" <DLawrence@paoca.org>, "Lauren M. Burge (lburge@paoca.org)" <lburge@paoca.org>, "Richard A. Kanaskie (rkanaskie@pa.gov)" <RKANASKIE@pa.gov>, "JOSEPH L. VULLO" <jlvullo@bvrrlaw.com>, "Patrick M. Cicero (pulp@palegalaid.net)" <pulp@palegalaid.net>, Joseph Otis Minott <joe\_minott@cleanair.org>, Kenneth Mickens <kmickens11@verizon.net>, Adeolu Bakare <abakare@mwn.com>, "Pamela C. Polacek" <ppolacek@mwn.com>, Daniel Clearfield <dclearfield@eckertseamans.com>, Mark Szybist <mszybist@nrdc.org>  
**Subject: Re: LTIP, Docket #, P-2017**

Chris:

Per my messages on September 6 and 7, 2017, and our subsequent conversation relating to PPL's instant LTIP.

- 1) Given the history of PPL's requests for increased funding, and the historic under performance of CAIDI and SAIDI benchmarks, please provide documentation as well as PPL's revised plan to improve CAIDI and SAIDI benchmark scores.
- 2) Please provide the benchmarks by quarter that PPL intends to achieve during this funding cycle.
- 3) Please provide the mechanism that rate payers can utilize to monitor and assure improved performance matches increased funding.
- 4) Please identify what "innovations and recent technologies PPL will be deploying during this funding cycle."
- 5) Please provide data and the review that support PPL's assertion, "Projected expenditures for the replacement of failed equipment are based on a review of historical trends while considering current failure rates and proactive mitigating measures."
- 6) Please provide data and studies the support PPL's assertion, "Projected expenditures for the replacement of failed equipment are based on a review of historical trends while considering current failure rates and proactive mitigating measures."

Sincerely,

Eric Epstein  
4100 Hillsdale Road  
Harrisburg, PA 17112

cc: Service list

Enclosure

## I & E

It should also be noted that PPL's Customer Average Interruption Duration Index (CAIDI) CAIDI and System Average Interruption Duration Index (SAIDI) **were below the benchmark score for the fourth quarter of 2014.**

**PPL did not provide evidence that it has gone above and beyond requirements.**

PPL stated, " Almost all of the initiatives shown in the table above take advantage of new technologies that did not exist when the associated assets were originally placed into service. **Many of these technologies are very recent innovations.** These technologies are expected not only to restore the assets to their original level of performance, but, in many cases, provide performance well beyond what previously was achievable in order to ensure and maintain adequate, efficient, safe, and reliable service. "

Re: PPL Electric Utilities Corporation Annual Asset Optimization Plan Docket No. M-2014-PPL Electric Utilities Corporation

### Distribution Automation Deployment

This plan meets the recommendation the Commission issued on August 7, 2012 regarding outage mitigation techniques during storm events.

### Identification/Justification Process

#### Scope

#### Areas selected for deployment:

- Have concentrations of distribution feeders that have been identified as WPCs.
- Have the operational flexibility to allow transfers and restoration of customers when service outages occur.
- Have significantly contributed to system SAIDI and SAIFI.

#### Customer Benefits:

- 500,000 customers (36%) will be covered under the distribution automation deployment.
- Significant reductions in system SAIDI and SAIFI.
- Reduction of the number of customers experiencing long duration service interruptions. Distribution automation will sectionalize the service interruption to the smallest possible area

in under five minutes.

- Major Event improvements:

- Fewer resources needed for switching (trouble crews can focus on cutting loops and performing repairs).

- Reduction in call volume due to automatic restoration of customers.

Approximately 16-28 distribution substations will be upgraded per year and approximately 223-53 2 distribution devices will be upgraded per year.

PPL Electric Utilities Corp.

### **Implementation of Long-Term Infrastructure Improvement Plan**

The instant Long Term Infrastructure Improvement Plan is a continuation of the AOS infrastructure replacements, in addition to various other prudent capital investments to ensure the safety and reliability of the distribution system.

The investments are expected to mitigate the growth in equipment failure projections in the short-term and eventually reverse the trend in the long-term. Equipment failure trends and asset-specific contributions to system-level reliability metrics are analyzed on an ongoing basis to ensure funding is invested appropriately.

**PPL Electric routinely reviews the effectiveness of programs to ensure cost-effective investment.** Program/project impact on SAIDI and SAIFI, in addition to potential reductions in outage response costs, are compared to the overall program/project costs.

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PPL Electric Utilities Corporation

**Projected expenditures for the replacement of failed equipment are based on a review of historical trends while considering current failure rates and proactive mitigating measures.** For such programs, it is difficult to project the specific scope and location. Therefore, PPL Electric has provided only planned expenditures based on historical trending information.

#### Reliability Experience

The Distribution Asset Planning process employed by PPL Electric has been focused on maintaining reliability at the level that existed prior to passage of the Electricity Generation Customer Choice and Competition Act ("Customer Choice Act"). Since the 1994-1998 benchmark period, which defines PPL Electric's reliability

<sup>1</sup> In 2013 the Company obtained Commission approval of its current LTIP for the period beginning January 1, 2013 through December 31, 2017, at Docket No. P-2012-2325034.

... performance targets, PPL Electric's service reliability has experienced annual swings, positive and negative, resulting largely from varying weather conditions. Increased and accelerated levels of funding for distribution reliability programs will help to ensure more consistent performance below the PUC benchmark. Historical benchmark performance is illustrated in Figures 1 and 2.

Figure 1: PPL Electric's SAIDI Performance  
System SAIDI vs. PUC Standards & Benchmark (1994-2016)



CMPC

To: CHIAVETA, R. PUC

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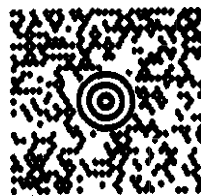
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SHIP ROSEMARY CHIAVETA, SECRETARY  
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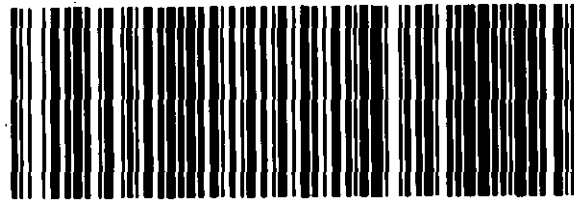
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