COMMONWEALTH OF PENNSYLVANIA

September 29, 2017

E-FILED

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

Re: Petition of PPL Electric Utilities Corporation for Approval of its Long-Term Infrastructure Improvement Plan for the Period January 1, 2018 through December 31, 2022 / Docket No. P-2017-2622393

Dear Secretary Chiavetta:

I am delivering for filing today the Comments of the Office of Small Business Advocate ("OSBA") to the Petition of PPL Electric Utilities Corporation for Approval of its Long-Term Infrastructure Improvement Plan for the period January1, 2018 through December 31, 2022, at the above-docketed proceeding.

Copies of these Comments will be served on all known parties, as indicated on the attached Certificate of Service.

If you have any questions, please contact me.

Sincerely,

Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures
cc: Parties of Record
Robert D. Knecht

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation	:	
Corporation for Approval of its Long-Term	:	**Docket No. P-2017-2622393**
Infrastructure Improvement Plan for the Period	:	
January 1, 2018 through December 31, 2022	:	

COMMENTS OF THE
OFFICE OF SMALL BUSINESS ADVOCATE

I. Introduction

On August 31, 2017, PPL Electric Utilities Corporation ("PPL" or "the Company") filed a Petition for Approval of its Long-Term Infrastructure Improvement Plan ("*LTIIP-II*") with the Pennsylvania Public Utility Commission ("Commission"). PPL's proposed *LTIIP-II*, which covers the years 2018 to 2022, is closely patterned on the Company's first LTIIP ("*LTIIP-I*"), which was approved on January 10, 2013, at Docket No. P-2012-2325034, and covered the years 2013 to 2017.

The Office of Small Business Advocate ("OSBA") submits these Comments to the Company's LTIIP as permitted by 52 Pa. Code § 121.4(c).

II. Comments

The requirements for a Long-Term Infrastructure Improvement Plan ("LTIIP") are set forth in Section 1352 of the Public Utility Code, 66 Pa. C.S. § 1352. In addition, the Commission regulations state, as follows:

> A utility has the burden of proof to demonstrate that its proposed LTIIP and associated expenditures are reasonable, cost effective and are designed to ensure and maintain efficient, safe, adequate, reliable and reasonable service to consumers.

52 Pa. Code § 121.4(d).

A. In General

In its proposed *LTIIP-II*, PPL has included $903.1 million for the future five-year period (2018 through 2022). This is compared to $705.6 million in *LTIIP-I*, which is an increase of $198 million, implying an average annual increase of 5.1 percent. Actual/forecast spending for 2013-2017 was $685 million, only a little below the $705.6 million set forth in *LTIIP-I*. A summary of each of the programs and annual costs, matched up as best as the OSBA can, is attached to these Comments.

In contrast, actual spending during the 2008 to 2012 period (prior to *LTIIP-I*) was $442 million.

LTIIP-II's categories of costs that most contribute to the increase in spending are, as follows:

> Distribution pole replacements ($81 million, including C-Truss distribution poles increase)
>
> Improve system reliability projects ($96 million, or $51 million when the "Circuit SAIDI Improvement category from LTIIP-I" is netted out)
>
> Replace failed underground cable ($45 million, primary and secondary)
>
> Volt var optimization ($23 million)

The OSBA addresses each of these categories below.

Unfortunately, PPL provides little information about the age of the equipment being replaced. While PPL includes an Appendix A with a listing of the average age of its equipment by FERC account number, the Company provides neither information regarding the distribution of equipment age nor any reasonable estimate of the reasonable lifespan for the equipment. While PPL also did not provide such information in *LTIIP-I*, the OSBA observes that the

Commission has recently put increased reliance on a Company's Commission-approved LTIIP in evaluating waivers to basic consumer protections that apply to the distribution system improvement charge ("DSIC").[1] In light of this increased emphasis on the LTIIP, the OSBA respectfully submits that it is incumbent upon the utility to demonstrate that there is a significant need to replace aging equipment, and to present reasonable evidence as to how much of the very old equipment will be replaced over the plan period. For example, PPL reports average pole age of 40 years. It would be much more useful for PPL to provide a reasonable estimate for pole life, and to provide a distribution of pole age, such as number of poles 40-50 years old, 50-60 years old, 60-70 years old, and 70 plus years old.

B. Distribution Pole Replacements/C-Truss Distribution Poles

Of the nearly $200 million overall increase in plan spending from *LTIIP-I* to *LTIIP-II*, some $81 million is related to distribution pole replacement or reinforcement. *See LTIIP-II*, at 18-19.

In *LTIIP-I*, PPL stated, as follows:

> PPL Electric inspects approximately 90,000 poles per year. Historical data suggests an approximate 5% rejection rate from the population of yearly inspections; of those rejected, 70% are candidates for reinforcement while 30% are candidates for replacement. PPL Electric is in the process of incorporating additional reinforcement technologies that are projected to reduce the replacement rate to approximately 15%. Replacing rejected poles avoids property damage and risk of accidental injury, and it mitigates the costs associated with extended service outages. Replacement rates are expected to fall as a result of PPL Electric's pole treatment program. The average age of an in-service wooden distribution pole is 35 years.

[1] For example, the Commission indicated that one factor in approving the waiver of the legislated rate cap on the DSIC for UGI Central Penn Gas was the fact that the company had ". . . increase[d] the amount of infrastructure spending over its original LTIIP to improve the safety and reliability of its system." *See Opinion and Order*, Docket No. P-2016-2537609, (Order entered May 10, 2017), at 41. Consequently, the OSBA is concerned that PPL will advance a similar argument, despite the fact that PPL offers little in the way of explanation for the large increase in spending in *LTIIP-II* over the original *LTIIP-I*.

LTIIP-I, at 17.

By basic arithmetic, *LTIIP-I* would imply pole replacement of (90,000) x (.05) x (.30) = 1350 poles per year before the new technologies, and (90,000) x (.05) x (.15) = 675 after the adoption of new technologies. Reasonably consistent with that, PPL forecasted replacements of 900-1200 in 2013, and 600-800 for 2014 to 2017. However, in *LTIIP-I*, PPL did not obviously reflect any further forecast reduction in replacement rates in the planning period, as the forecast replacements remained at 600-800 poles for 2014 through 2017. *LTIIP-I*, at 17.

PPL, in its proposed *LTIIP-II*, makes a very similar statement:

> PPL Electric inspects approximately 90,000 poles per year. Historical data suggests an approximate 5% rejection rate from the population of yearly inspections; ***of those rejected, 70% are candidates for reinforcement while 25% are candidates for replacement.*** Replacing rejected poles avoids property damage and risk of accidental injury, and it mitigates the costs associated with extended service outages. Replacement rates are expected to fall as a result of PPL Electric's pole treatment program. The average age of an in-service wooden distribution pole is 38 years.

LTIIP-II, at 18 (emphasis added).

It is unclear what PPL plans to do with the 5 percent of rejected poles that are neither replaced (25%) nor reinforced (70%). PPL also offers no explanation as to what happened to the "additional reinforcement technologies" that served to reduce the forecast replacement rate in *LTIIP-I*. The OSBA respectfully submits that PPL should explain this significant change in its forecasting.

Even with the elimination of additional reinforcement technologies, PPL's figures suggest a replacement of (90,000) x (.05) x (.25) = 1,125 poles per year. However, PPL now forecasts replacements of 2,900 to 3,200 poles per year for every year in the plan (again with no

recognition of the forecast reduction in replacement rate). *See LTIIP-II*, at 18. Based on PPL's explicit language for pole replacement, the forecast replacements are significantly overstated.

The OSBA observes, however, that in the "C-Truss Distribution Poles" section of *LTIIP-II,* the rejection rate on pole inspections has mysteriously climbed to 10 percent from the 5 percent value reported in *LTIIP-I* and the Distribution Pole Replacement section of the *LTIIP-II*. *Compare LTIIP-II*, at 18 *with LTIIP-II*, at 19. The OSBA suspects that the rejection rate in the "Distribution Poles" section is an error, and the Company's intent was to use a rejection rate of 10 percent.

However, if the OSBA's supposition is correct, this raises two additional issues.

First, what has caused the rejection rate to double between 2012 and 2017? The rejection rate is presumably based on some multi-year average, and the Company offers no explanation as to why the rate has increased so dramatically over five years, nor does it provide any historical information in support of its position. The OSBA respectfully submits that PPL should do so to reasonably meet its burden in this proceeding.

Second, even at a 10 percent rejection rate, the replacement poles should be (90,000) x (.10) * (.25) = 2,250 poles per year, well below the Company's forecast of 2,900 to 3,200 poles per year. PPL does not explain this discrepancy.

The OSBA also observes that the apparent overstatement in pole replacements is more or less offset by a corresponding understatement in the forecast for C-Truss reinforcements. While it is unclear what causes the apparent understatement of reinforcements, it is possible that PPL has mis-stated the percentage of rejected poles that must be replaced (and, correspondingly, the ones that can be reinforced).

The OSBA estimates that if about 35 percent of the rejected poles needed to be replaced and 66 percent could be reinforced, the Company's numbers would be at least in the ballpark of being correct:

(90,000) x (.10) x (.35) = 3150 replaced

(90,000) x (.10) x (.65) = 5850 reinforced

However, if this is what the Company intended, it raises the question as to why the replacement rate is higher than it was in *LTIIP-I*. As the Company offers no explanation in *LTIIP-II*, the OSBA respectfully requests that the Company clarify its calculations and provide reasonable supporting data for the key assumptions, particularly those that have changed substantially since *LTIIP-I*.

C. System Reliability Improvement Projects

PPL generally describes this cost account as projects developed on a quarterly basis that may extend over multiple years targeted at the "worst performing circuits." *See LTIIP-II*, at 40-41.

In *LTIIP-I*, the Company planned to spend $76 million on anywhere from 52 to 111 projects, implying a possible range of $685,000 to $1.47 million per project. *See LTIIP-I*, at 40-41. For *LTIIP-II*, the Company has reduced its project range to 52 to 94 projects, but more than doubled the cost to $172 million (or a range of $1.83 to $3.30 million per project). *See LTIIP-II*, at 40-41.

PPL offers no basis for the large increase in estimated project cost. In fact, the Company uses the identical language in *LTIIP-II* as it used in *LTIIP-I*. The OSBA respectfully submits that this proposed increase is not supported by any facts, and that PPL has not met its burden to justify the proposed cost increase.

D. Volt Var Optimization (formerly "Capacitors")

PPL proposes to increase planned spending for capacitors on its system from $1.4 million in *LTIIP-I* to $24.4 million in *LTIIP-II*, with average number of locations increasing from 100 to 2,250. The average cost per location declines modestly from $13,800 to $10,800. *See LTIIP-II*, at 22.

PPL offers no rationale for this very large increase in spending. In fact, virtually the identical language is used in *LTIIP-II* that is used in *LTIIP-I*. The Commission should require PPL to explain this large increase in spending.

E. Replace Failed Underground Cable

The replacement of underground cable in the Company's *LTIIP-I* and *LTIIP-II* show up in a variety of different categories, and it is not at all clear that there is not double-counting of expected costs. *See LTIIP-II*, at 26.

Replacing underground cable appears to be included in the following categories in *LTIIP-I* and *LTIIP-II*:

PPL LTIIP Underground Cable Replacement Accounts $mm		
	LTIIP-I	**LTIIP-II**
Replace failed underground primary cable (residential)	$17.9	$72.6*
Replace failed underground secondary cable (residential)	$9.7	N/A
Replace failed 12 kV underground getaway cables	$2.4	$7.4
Underground Cable Replacement and Life Extension	$51.7	$40.0
Replace deteriorated/failed low tension network equipment and structures	$7.1	$5.0
Low Tension Network Primary Cable, Equipment and Structures	$27.8	$23.0
Underground 12 kV Getaway Cable Replacements and Life Extension	$25.9	$30.6
Sub-Total	**$114.7**	**$155.5**
* May include secondary voltage cable, but LTIIP reports only primary.		

As shown in the table above, the categories are not easy to delineate, and thus there is potential for overlapping costs. For example, there are two categories for addressing 12 kV "Getaway" cables, with no obvious delineation. Moreover, the differences in the definitions for "underground cable replacement and life extension" are not clearly different from "replace failed underground primary cable." In fact, the descriptions for those two categories start with "candidates are selected based on history of cable failures" and "candidates are identified via actual failures."

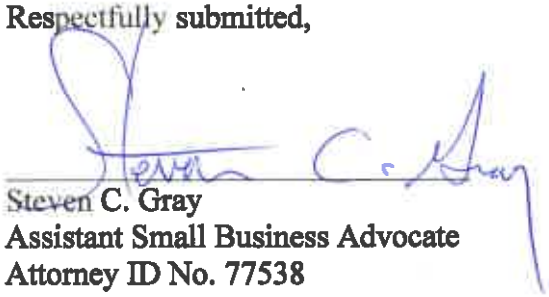
In the "replace failed underground cable" category, which has the largest increase in costs, PPL provides no information at all as to why the planned spending increases from $17.9

million for *LTIIP-I* ($27.6 million if secondary is included) to $72.6 million in *LTIIP-II*. The OSBA respectfully submits that this large increase should be justified. Moreover, PPL should be required to explain how it ensures that costs are not double-counted in the *LTIIP-II* categories.

III. Conclusion

Wherefore, the OSBA respectfully submits that *LTIIP-II* is inadequate as filed. The OSBA requests that the Company be given the opportunity to supplement its filing to (a) provide a reasonable explanation for the cost increases addressed in these comments and (b) clarify the inconsistencies in *LTIIP-II* as discussed herein. The OSBA further respectfully requests that the Commission consider these Comments and the Company's response when it decides whether to approve, reject, modify, or refer to the Office of Administrative Law Judge for hearings on PPL's *LTIIP-II*.

Respectfully submitted,



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Dated: September 29, 2017

PPL Electric Long Term Infrastructure Improvement Plans 2013 to 2017 and 2018 to 2022 ($mm)

Infrastructure Initiative	2013	2014	2015	2016	2017	Total	LTIIP	2018	2019	2020	2021	2022	Total	$ Diff	% Diff
														0.00	#DIV/0!
Circuit SAIDI Improvement	6.54	8.44	8.76	11.21	9.23	44.18								-44.18	-100%
Copper Weld Copper	4.97	6.56	5.92	6.11	6.32	29.88	Copper Weld Copper	0.76	1.82	2.50	2.54	2.04	9.66	-20.22	-68%
Cross-Yard 12 kV Underground Tie	1.03	1.06	1.09	1.11	1.13	5.42	Cross-Yard 12 kV Underground Tie	1.72	1.65	3.03	2.99	2.05	11.44	6.02	111%
C-Truss Distribution Poles	1.45	1.54	1.57	1.60	2.00	8.16	C-Truss Distribution Poles	4.25	4.46	4.43	4.48	5.05	22.67	14.51	178%
Customers Experiencing Multiple Interruptions	4.41	2.37	2.44	3.42	2.86	15.50	Customers Experiencing Multiple Interruptions	2.78	3.29	4.36	4.35	3.81	18.59	3.09	20%
Distribution Animal Guarding	1.06	1.50	1.52	0.84	0.86	5.78	Distribution Animal Guarding	0.70	0.77	0.76	0.75	0.77	3.75	-2.03	-35%
Distribution Automation Development	9.99	14.73	21.29	22.74	24.43	93.18	Distribution Automation Development	12.07	17.66	21.11	18.13	6.02	74.98	-18.20	-20%
Distribution Failed Equipment	13.35	13.17	13.88	14.01	14.57	68.98	Distribution Failed Equipment	16.90	16.90	17.70	17.69	17.90	87.09	18.11	26%
Distribution Pole Replacements	6.61	4.00	4.40	4.43	4.64	24.08	Distribution Pole Replacements	17.45	17.82	18.13	18.46	19.09	90.95	66.87	278%
Distribution Reliability Preservation	10.81	7.39	7.27	9.62	9.81	44.90	Distribution Reliability Preservation	6.58	8.09	11.12	11.10	11.23	48.12	3.22	7%
Distribution Substation Circuit Breakers	5.74	3.24	4.30	4.27	3.64	21.19	Distribution Substation Circuit Breakers	6.90	6.04	5.90	5.78	4.65	29.27	8.08	38%
Distribution Substation DC Equipment	0.35	0.37	0.39	0.39	0.39	1.89	Distribution Substation DC Equipment	0.19	0.26	0.25	0.25	0.27	1.22	-0.67	-35%
Fiber Wrap Distribution Poles	3.36	1.58	1.57	1.62	1.50	9.63	Fiber Wrap Distribution Poles	2.05	2.15	2.14	2.15	2.43	10.92	1.29	13%
Improve System Reliability Projects	13.58	15.07	15.31	15.95	16.30	76.21	Improve System Reliability Projects	2.14	28.36	30.66	65.50	45.12	171.78	95.57	125%
							Line Cutouts	1.51	1.51	1.51	1.51	1.02	7.06	7.06	#DIV/0!
Low Tension Network Primary Cable, Equipment and Structures	4.41	8.56	4.61	4.64	5.61	27.83	Low Tension Network Primary Cable, Equipment and Structures	2.77	5.69	5.65	5.79	3.09	22.99	-4.84	-17%
							LTN AUTOMATION	0.00	3.43	3.41	4.67	0.00	11.51	11.51	#DIV/0!
Miscellaneous Substation Equipment	1.93	1.06	1.67	0.99	1.73	7.38	Miscellaneous Substation Equipment	1.36	1.97	2.23	2.23	2.06	9.85	2.47	33%
New Hydraulic Reclosers	0.81	0.70	0.62	0.50	0.40	3.03	New Hydraulic Reclosers	0.02	0.23	0.23	0.23	0.25	0.96	-2.07	-68%
Protection and Control	1.41	0.88	1.00	1.00	1.00	5.29	Protection and Control	1.90	2.16	4.98	5.05	5.18	19.27	13.98	264%
Recloser Replacements	6.38	5.72	5.76	4.77	4.92	27.55								-27.55	-100%
Reliability Preservation Emergent	1.01	1.13	1.55	1.59	1.70	6.98	Reliability Preservation Emergent	1.80	1.77	2.03	1.74	1.74	9.08	2.10	30%
Repair Failed 138/69 12 kV Transformers	1.07	1.10	1.14	0.01	0.01	3.33								-3.33	-100%
Replace Deteriorated/Failed Low-Tension Network Equipment and Structures	1.46	1.52	1.34	1.37	1.39	7.08	Replace Deteriorated/Failed Low-Tension Network Equipment	0.86	0.86	1.21	1.21	0.81	4.95	-2.13	-30%
Replace Failed 12kV Underground Getaway Cable	0.46	0.47	0.48	0.49	0.51	2.41	Replace Failed 12kV Underground Getaway Cable	1.32	1.52	1.51	1.51	1.53	7.39	4.98	207%
Replace Failed Underground Primary Cable	3.60	3.48	3.50	3.62	3.68	17.88	Replace Failed Underground Cable	14.19	14.19	14.70	14.69	14.86	72.63	54.75	306%
Replace Failed Underground Secondary Cable	1.83	1.90	1.95	1.96	2.03	9.67								-9.67	-100%
Replace Deteriorated/Failed Area Supply Substation Equipment	1.05	1.09	1.12	1.15	1.19	5.60	Replace Deteriorated/Failed Area Supply Substation Equipment	2.53	2.52	3.02	3.02	2.48	13.57	7.97	142%
Substation 69/12 kV Transformer Replacement	3.42	7.76	3.40	5.27	4.50	24.35	Substation 69/12 kV Transformer Replacement	5.87	5.04	4.07	4.08	4.39	23.45	-0.90	-4%
Substation Animal Guarding	3.25	2.46	2.55	2.57	2.68	13.51	Substation Animal Guarding	0.51	0.51	0.51	0.51	0.26	2.30	-11.21	-83%
Underground Residential Development Cable Replacement and Life Extension	11.54	9.66	9.97	10.16	10.40	51.73	Underground Cable Replacement and Life Extension	7.89	7.98	8.35	8.33	7.40	39.95	-11.78	-23%
12 kV Underground Getaway Cables	2.72	5.02	5.80	6.13	6.21	25.88	Underground Getaway Cable Replacements and Life Extens	5.05	5.30	7.05	7.05	6.10	30.55	4.67	18%
Unreimbursed Highway Relocations	2.83	2.96	3.05	3.14	3.33	15.31	Unreimbursed Highway Relocations	5.21	4.60	4.57	4.56	3.85	22.79	7.48	49%
Capacitors	0.24	0.23	0.28	0.36	0.26	1.37	Volt Var Optimization	2.72	2.97	8.64	4.79	5.25	24.37	23.00	1679%
Total	132.67	136.72	138.58	147.04	149.23	705.16	Total	130.00	171.51	195.76	225.14	180.70	903.11	197.95	28%

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Corporation for Approval of its Long-Term	:	**Docket No. P-2017-2622393**
Infrastructure Improvement Plan for the Period	:	
January 1, 2018 through December 31, 2022	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or first-class mail (unless other noted below) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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