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File #: 153362

November 2, 2017

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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:

On August 31, 2017, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) filed and served a Petition for Approval of its second Long-Term Infrastructure Improvement Plan (“LTIP-2”) for the period January 1, 2018 through December 31, 2022. A copy of the Company’s proposed LTIP-2 was provided as Attachment 1 to the Petition. Subsequent to the filing, PPL Electric identified a typographical error on page 18 of the LTIP-2. Enclosed for filing is a corrected page 18 to the Company’s proposed LTIP-2.

On page 18 of the proposed LTIP-2, the rejection rate for distribution poles should be 10 percent, not 5 percent. As such, the sentence on page 18 that reads “PPL indicates that 5% of inspected poles are rejected, and of those rejected, 70% are candidates for reinforcement and 25% are candidates for replacement,” should read “PPL indicates that 10% of inspected poles are rejected, and of those rejected, 75% are candidates for reinforcement and 25% are candidates for replacement.”

Both clean and blackline versions of the corrected page 18 of the LTIP-2 are enclosed. PPL Electric respectfully requests that the original version of page 18 submitted with the filing be replaced with the enclosed corrected page 18 of the LTIP-2.

Rosemary Chiavetta, Secretary
November 2, 2017
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Copies of this letter are being served as indicated on the Certificate of Service.

Respectfully submitted,



Christopher T. Wright

CTW/jl
Enclosures

cc: Certificate of Service

CERTIFICATE OF SERVICE

Docket No. P-2017-2622393

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL and FIRST CLASS MAIL

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Environmental Defense Fund

Date: November 2, 2017



Christopher T. Wright

PPL Electric Utilities Corporation

Distribution Pole Replacements

Program Description and Purpose

Replacement of distribution wood poles identified as non-restorable (cannot be reinforced) during the annual inspect and treat program or during a spot inspection in an effort to improve public and employee safety, as well as service reliability. This program contributes to storm hardening efforts and aims to improve public and employee safety, as well as service reliability, by reducing potential pole failures.

Identification/Justification Process

PPL Electric inspects approximately 90,000 poles per year. Historical data suggests an approximate 10% rejection rate from the population of yearly inspections; of those rejected, 75% 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.

Scope

The scope of the program is a direct correlation to the number of wood pole inspections.

Planned Replacements in Units					
2018	2019	2020	2021	2022	Total Scope
2900-3200	2900-3200	2900-3200	2900-3200	2900-3200	14500-16000

Locations

Specific locations are a direct correlation to the wood pole inspection plan. Inspection locations are identified yearly primarily as a function of previous inspection dates, as well as ensuring cost-effectiveness of the program and minimizing inspection crew movements.

Planned Expenditures (in millions)

Planned Expenditures					
2018	2019	2020	2021	2022	Total
\$17.45	\$17.82	\$18.13	\$18.46	\$19.09	\$90.95

PPL Electric Utilities Corporation

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Identification/Justification Process

PPL Electric inspects approximately 90,000 poles per year. Historical data suggests an approximate 51% rejection rate from the population of yearly inspections; of those rejected, 77.5% 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.

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