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September 5, 2018

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: John Kline v. PPL Electric Utilities Corporation
Docket No. C-2017-2621072

Dear Secretary Chiavetta:

Enclosed for filing is the Exception of PPL Electric Utilities Corporation to the Initial Decision in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,


Devin Ryan

DTR/jl
Enclosures

cc: Honorable Elizabeth Barnes
Certificate of Service
Office of Special Assistants (*via e-mail*)

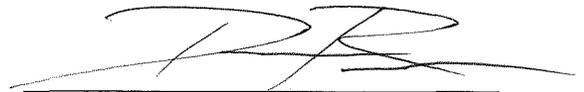
CERTIFICATE OF SERVICE

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 & FIRST CLASS MAIL

John Kline
5611 Stradford Drive
Harrisburg, PA 17112
Jack.Kline@ecolab.com

Date: September 5, 2018



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

John Kline,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2017-2621072
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**EXCEPTION OF PPL ELECTRIC UTILITIES CORPORATION TO THE
INITIAL DECISION**

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Date: September 5, 2018

Attorneys for PPL Electric Utilities Corporation

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I. BACKGROUND

On August 24, 2017, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) was served with the above-captioned Formal Complaint filed by John Kline (“Complainant”) with the Pennsylvania Public Utility Commission (“Commission”). In his Complaint, the Complainant contests PPL Electric’s planned installation of a new automated metering infrastructure (“AMI”) meter at his property, 5611 Stradford Drive, Harrisburg, Pennsylvania.

On September 13, 2017, PPL Electric filed its Answer to the Complaint.

On March 29, 2018, an in-person evidentiary hearing was held before Administrative Law Judge Elizabeth H. Barnes (the “ALJ”).

On May 16, 2018, PPL Electric filed its Main Brief.

On May 17, 2018, the Complainant filed his Main Brief.

On July 9, 2018, PPL Electric filed its Reply Brief.

On July 10, 2018, the Complainant filed his Reply Brief.

The reclosed closed on July 10, 2018.

On August 16, 2018, the ALJ’s Initial Decision (“ID”) was issued. The ID dismissed the Complaint with prejudice but made certain recommendations to the Company concerning fire safety.

PPL Electric fully supports the ID’s well-reasoned dismissal of the Complaint with prejudice.

However, the Company is filing a limited Exception to the ID because the ID did not need to make the fire safety recommendations since these recommendations have already been adopted by the Company or are unnecessary given the Company’s established practices and procedures.

Thus, PPL Electric respectfully requests that the Commission grant this limited Exception and modify the ID accordingly.

II. EXCEPTION

Exception No. 1: The ID did not need to make the fire safety recommendations because these recommendations have already been adopted by the Company or are unnecessary given the Company's established practices and procedures. ID at 18-19.

III. ARGUMENT

The ID correctly dismissed the Complaint with prejudice, finding, among other things, that: (1) the installation of the new automated metering infrastructure ("AMI") meter is required by Act 129 of 2008; (2) the Complainant failed to sustain his burden of proof that the installation of the new AMI meter would violate Section 1501 of the Public Utility Code. ID at 13-23, 25. As a part of this decision, the ID properly found that the new AMI meter would not be a fire risk. ID at 16-19. Particularly, the ID was persuaded by the credible testimony of the Company's witnesses that the new AMI meters are safe, not fire hazards, and have devices designed to actually help prevent fires. ID at 16-19.

Notwithstanding, the ID made the following recommendations for the first time in this proceeding¹:

I encourage PPL and/or its Agents (i.e. Grid One Solutions) to perform a statistically relevant sample audit on its past meter installations and going forward to perform certain meter base checks (if it is not already doing so) prior to setting any meters as an added precaution against fires caused by micro-arcing. I recommend PPL and its Agents consult with other peer EDCs to determine and adopt the best practices regarding customer meter

¹ As the Company was not presented with an opportunity to respond on the record in this proceeding to all of the ID's fire safety recommendations, attached hereto is a Verification signed by Mr. Scott Larson, who is a Senior Engineer of PPL Electric and was one of the Company's witnesses, attesting to the veracity of the information stated herein in response to the ID's fire safety recommendations.

base inspections. In summary, PPL should perform what tests serve to minimize any potential fires due to micro-arcing.

...

I recommend PPL and its Agents verify that the Underwriter's Inspection Certificate is present on every AMI meter prior to its installation as an additional precaution.

ID at 18-19.

A. EXCEPTION NO. 1: THE ID DID NOT NEED TO MAKE THE FIRE SAFETY RECOMMENDATIONS BECAUSE THEY HAVE ALREADY BEEN ADOPTED BY THE COMPANY OR ARE UNNECESSARY

The ID did not need to make the fire safety recommendations because they have already been adopted by the Company or are unnecessary given the Company's established practices and procedures. ID at 18-19.

First, the ID's recommendation that PPL Electric or its agents perform audits of past installations has already been adopted by the Company. Specifically, the Company has had two sets of audits performed on its past meter installations: one by Grid One Solutions LLC ("Grid One"), which is the contractor who installs the new AMI meters, and TESCO – The Eastern Specialty Company ("TESCO"). To date, Grid One has completed 5,790 audits, and TESCO has completed approximately 37,000 audits.

Second, PPL Electric or its agents already "perform certain meter base checks . . . prior to setting any meters" as recommended by the ID. ID at 18. Indeed, PPL Electric's contractor, Grid One, inspects all meter bases before installing the new AMI meters. The technicians employed by Grid One receive training on how to identify issues with the meter bases. When discovering a potential issue, these technicians report the issue so that the customer-owned meter base can be repaired or replaced by the Company. To date, PPL Electric has repaired or replaced approximately 10,000 meter bases.

Third, there is no need to place the UL inspection certificate on all of the AMI meters. As the ID recognized, the Company's new AMI meters are certified by UL. ID at 18-19.

Fourth, the ID's recommendations for the Company to consult with peer electric distribution companies ("EDCs"), adopt best practices, and perform additional tests during meter base inspections are unnecessary as well. PPL Electric already has consulted with peer EDCs about these issues, performed extensive investigation and testing concerning these issues, and adopted best practices, including the in-depth inspections of the customer-owned meter bases before the new AMI meters are installed.

In April of 2013, PPL Electric partnered with TESCO to investigate meter failures due to hot socket conditions. The scope was to identify root cause, develop comprehensive test plan for meters, develop a site audit plan, and create a test fixture to simulate conditions. The root cause of these hot socket conditions was identified as loose or broken jaws within the customer-owned meter bases. This situation would create an air gap around the meter blade; paired with any type of vibration, micro-arcing would occur creating a rise in temperature.

Based upon these findings PPL Electric developed a test fixture, the TESCO 3100-L Hot Socket Test Simulator, and successfully recreated the exact micro-arcing scenario in a controlled environment with the ability to control and monitor temperature at the meter blades. The Company also developed an enhanced field inspection criterion that was integrated into all applicable metering department instructions. Further, PPL Electric provided a training course about the enhanced field inspection criterion. The Company's findings also were shared with peer utility groups through the Association of Edison Illuminating Companies.

In November of 2014, the Company moved into the evaluating the new AMI meters that were to be deployed pursuant to its Commission-approved Smart Meter Plan. PPL Electric

utilized the data gained from its TESCO partnership to set a high standard of acceptance for each meter under consideration. Based on this testing, the Landis+Gyr Focus meter was found to be the best device in withstanding heat and met the Company's high standards of acceptance. (Tr. 88-89) Moreover, the new AMI meter allows the Company to track temperature in 15-minute intervals and monitor trends. (Tr. 88) The meter also contains temperature alarms that will alert the Company if there is an issue, so it can dispatch a qualified technician to perform an investigation. (Tr. 88, 90-91)

In addition, during meter base inspections, the Company's contractor already: (1) verifies that conductor terminals are tight; (2) identifies and addresses any defects during installation, i.e., loose or broken socket jaws, significantly corroded and rusty socket jaws, and compromised meters that leak or are degraded by rodent or insect infestation; and (3) checks that the common neutral is common to all exposed metal surface. Thus, the Company is already performing the tests need to "minimize any potential fires due to micro-arcing." ID at 18.

For these reasons, PPL Electric fully supports and is not contesting the ID's dismissal of the Complaint with prejudice; however, the Company respectfully requests that the ID be modified to remove the ID's fire safety recommendations that have already been adopted by the Company or are unnecessary given the Company's established practices and procedures.

IV. CONCLUSION

WHEREFORE, the Pennsylvania Public Utility Commission should grant PPL Electric Utilities Corporation's limited Exception and enter a Final Order consistent with this Exception that adopts the Initial Decision Dismissing Complaint, as modified to remove the fire safety recommendations.

Respectfully submitted,



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Date: September 5, 2018

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

John Kline,	:	
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Complainant,	:	
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v.	:	Docket No. C-2017-2621072
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

VERIFICATION

I, Scott Larson, being Senior Engineer at PPL Electric Utilities Corporation, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: September 5, 2018



Scott Larson