

**Hawke
McKeon &
Sniscak LLP**

ATTORNEYS AT LAW

Thomas J. Sniscak
(717) 236-1300 x224
tjsniscak@hmslegal.com

Whitney E. Snyder
(717) 236-1300 x260
wesnyder@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

M-2009-209 4773

October 16, 2018

BY HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120

RECEIVED
2018 OCT 16 PM 2:08
PA PUC
SECRETARY'S BUREAU
FRONT DESK

RE: Pike County Light & Power Company's Biennial Inspection, Maintenance, Repair and Replacement Plan 2020 and 2021 (Public Version)

Dear Secretary Chiavetta:

Enclosed for filing is Pike County Light & Power Company's Biennial Inspection, Maintenance, Repair and Replacement Plan 2020 and 2021.

If you should have any questions, please feel free to contact me at 717-236-1300.

Very truly yours,



Thomas J. Sniscak
Whitney E. Snyder

Counsel to Pike County Light & Power Company

TJS/WES/das
Enclosure

cc: David Washko, Supervisor (PUC Bureau of Technical Utility Services)



Steven L. Grandinali
General Manager
(570) 832-2988, ext. 354 FAX:
(570) 832-0349
Email: grandinali@pclpeg.com

RECEIVED
2018 OCT 16 PM 2:09
PA PUC
SECRETARY'S BUREAU
FRONT DESK

M-2009-2094773

October 16, 2018

BY HAND DELIVERY
Honorable Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, P A 17120

Re: Pike County Light & Power Company
Biennial Inspection, Maintenance, Repair and Replacement Plan 2020 and 2021

Dear Secretary Chiavetta:

Pursuant to the provisions of 52 Pa. Code §57.198, Pike County Light & Power Company ("PCL&P") hereby files four copies of its biennial Inspection and Maintenance Plan ("I&M Plan") for the periodic inspection, maintenance, repair, and replacement of its facilities.

PCL&P requests a continuation of the waiver for the requirement to perform load calculations as part of pole inspections, as set forth in §57.198(n)(2)(vi). As previously explained to the Pennsylvania Public Utility Commission, PCL&P provides application guidance in its design and construction standards to assure that all poles installed can safely handle standard utility equipment loads. Accordingly, a requirement to perform load calculations as part of the pole inspection program is not warranted. PCL&P's I&M Plan meets all other requirements of 52 Pa. Code §57.198.

Sincerely,

Steven L. Grandinali
General Manager

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

For the Period of January 1, 2020 – December 31, 2021

Submitted by:

Steven L. Grandinali
General Manager
105 Schneider Lane
Milford, Pa 18337
email - grandinali@pclpeg.com

Dated: October 16, 2018

§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*

PUBLIC VERSION

) (

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 [REDACTED] feeds into the service territory and [REDACTED] distribution circuits; the total overhead primary mileage is approximately 100 miles. The circuits are located within Pike County. PCL&P maintains this system on a three and five-year vegetation maintenance cycle. In 2015, the 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 the entire system within each five -year period. The entire 100.0 miles was last maintained in 2012. The [REDACTED] feeds were completed in 2015 and 2016 respectively. The [REDACTED] distribution circuits were completed in 2017. Hot spot trimming, applying program specifications, was also completed on Line 7 for approximately 1000 feet known as Pinetree Alley. The 34.5kv circuits will be completed in 2018 and 2019.

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 circuits are tracked via PCLP outage reporting. This allows the PCL&P reliability contractor and General 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 to 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 |
| [REDACTED] | [REDACTED] | 5 years |
| [REDACTED] | [REDACTED] | 5 years |
| [REDACTED] | [REDACTED] | 3 years |

Justification

PCL&P's Vegetation Management Plan meets the requirements of 52 Pa Code §57.198(n) (1). No waiver is being requested.

§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 [REDACTED] distribution poles in PCP&L territory. In 2017, [REDACTED] poles were inspected to maintain the inspection count delayed in 2016. The Plan is to inspect [REDACTED] poles per year in 2020 and 2021. 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) | |
|-------|-----------------------------------|------------|
| | 2020 | 2021 |
| PCL&P | [REDACTED] | [REDACTED] |

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 §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 intended to be replaced within 30 days. The remaining poles identified for replacement are prioritized and scheduled for replacement. Prior to the transition between ORU and PCLP, this backlog of pole replacements were not replaced by ORU presale, but since the mid-year 2018, have been replaced on an ongoing basis on a prioritized basis and will continue to be replaced into 2019 along with the poles identified in the fall of 2017.

Justification

PCL&P's Distribution Pole Inspection Failure Plan meets the requirements of 52 Pa Code §57.198(n) (3). No waiver is being requested.

§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.*

Program Description

PCL&P will conduct inspections of its overhead distribution facilities by ground and/or drone patrols every two years. This first PCLP cycle will be completed over 2018 and 2019. The purpose of the inspection program is to verify that the overhead facilities are in a safe, operational and reliable condition. The inspections will be performed by a qualified Company or Contractor representative. The overhead lines and equipment will be inspected for damage including broken insulators and conductors, equipment fluid leaks, infrared hot spots and any other conditions which may adversely affect the distribution system. Inspection information will be documented, and corrective action performed.

Inspection Plan

| | Circuit | Overhead Line Inspections Planned (Miles) | |
|--|---|---|-------|
| | | 2020 | 2021 |
| PCL&P  (100.00 miles) |  | 0 | 6.81 |
| |  | 0 | 13.14 |
| |  | 0 | 15.29 |
| |  | 0 | 2.35 |
| |  | 0 | 62.41 |

Justification

PCL&P’s Distribution Overhead Line Inspection Plan meets the requirements of 52 Pa Code §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.*

Corrective Maintenance

Any deficiencies on PCL&P’s overhead distribution system discovered during performance of its distribution overhead line inspections will be addressed based on the severity of the deficiency. Critical maintenance problems that may affect the integrity of circuits will be repaired or replaced within 30-45 days of discovery.

Justification

PCL&P’s Distribution Overhead Line Inspection Failure Plan meets the requirements of 52 Pa Code §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 everyone to two years. 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.

Program Description

PCL&P will inspect all its overhead distribution transformers on a [REDACTED] year cycle as part of the overhead distribution line inspection program.

PCL&P will inspect all its pad-mount transformers on a [REDACTED] year cycle. There are no below-ground transformers on the Pike system. The purpose of the inspection is to verify that all transformers are in a safe, operational and reliable condition. The inspection will be performed by a qualified Company representative. The inspector will look for rust, dents and other evidence of contact, leaking oil, installations of fences and shrubbery that could adversely affect access to and operation of the transformer, unauthorized excavations or changes in grade near the transformer and any other conditions which may affect the safety, access to or operation of the transformer.

Inspection information will be documented. Conditions that require corrective actions will be repaired as required by the severity of the deficiency identified.

Inspection Plan

| | Circuit | Overhead Transformer Inspections Planned (Number) | |
|------------|------------|---|------|
| | | 2020 | 2021 |
| PCL&P | [REDACTED] | 0 | 57 |
| [REDACTED] | [REDACTED] | 0 | 196 |
| Type | [REDACTED] | 0 | 246 |
| | [REDACTED] | 0 | 872 |
| | [REDACTED] | 0 | 27 |

| | Circuit | Padmount Transformer Inspections Planned (<i>Number</i>) ¹ | |
|---|------------|---|------|
| | | 2020 | 2021 |
| PCL&P [REDACTED] [REDACTED] [REDACTED] | [REDACTED] | 1 | 0 |
| | [REDACTED] | 9 | 0 |
| | [REDACTED] | 40 | 0 |
| | [REDACTED] | 111 | 111 |

Justification

PCL&P's Distribution Transformer Inspection Plan meets the requirements of 52 Pa Code §57.198(n) (6). No waiver is being requested.

¹ [REDACTED]. The last cycle concluded in 2013 and the next inspection cycle will commence in 2018/2019.

§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.

Program Description

PCL&P visually inspects each three-phase recloser annually and performs functional tests every three years. No single phase reclosers are operating on the PCP&L system.

Inspection Plan

| | Recloser Inspections Planned | |
|--------|------------------------------|------|
| | 2020 | 2021 |
| ██████ | █ | █ |
| ██████ | █ | █ |

Justification

PCL&P Recloser Inspection Plan meets the requirements of 52 Pa Code §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.*

Program Description

PCL&P inspects its one substation facility monthly. The purpose of this inspection is to identify abnormalities before they become larger problems. Visual inspections and the collection of counter readings and equipment information has proven to be valuable in predicting the health and integrity of our substation equipment and facilities.

Each month a class #1 inspection is performed as described below:

- Visual inspection of transformer and breakers for oil leaks, oil levels, nitrogen pressure, connections, condition of bushings and Circuit Breaker (“CB”) operating mechanism;
- Visual inspection of battery banks, chargers, control board indicating lights, control house lights, yard lights;
- Visual inspection of minor equipment including Potential Transformers, Current Transformers, Capacitive Coupled Potential Devices disconnect switches and bus connections;
- Visual inspection of all structures, fences and yard surfaces; and
- Counter readings taken of breakers and the tap changer.

Inspection Plan

| Substation | | Substation Inspections Planned | |
|------------|------------|--------------------------------|------|
| | | 2020 | 2021 |
| PCL&P | ██████████ | ██ | ██ |

Justification

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