

Kimberly A. Klock
Senior Counsel

PPL
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.5696 Fax 610.774.4102
KKlock@pplweb.com



E-File

December 3, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17120

**Re: PPL Electric Utilities Corporation Supplemental Information for
Nunc Pro Tunc Request for Exclusion of March 2 – March 10, 2018
Major Outage Data for Reliability Reporting Purposes
Docket No. M-2018-3006032**

Dear Ms. Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is Supplemental Information for PPL Electric's *Nunc Pro Tunc* Request for Exclusion of March 2 – March 10, 2018 Major Outage Data for Reliability Reporting Purposes, previously submitted on November 14, 2018 at the above referenced docket.

Pursuant to 52 Pa. Code §1.11, the enclosed document is to be deemed filed on December 3, 2018, which is the date it was filed electronically using the Commission's E-Filing System.

If you have any questions regarding the enclosed document, please contact me or Salim Salet, Director-Distribution Engineering at (610) 774-2941.

Very truly yours,

A handwritten signature in blue ink that reads "Kimberly A. Klock". The signature is fluid and cursive, with the first name being the most prominent.

Kimberly A. Klock

cc: Ms. Kelly Monaghan
Mr. Paul Diskin
Mr. Daniel Searfoorce
Mr. David Washko

Supplemental Information for PPL Electric Utilities Corporation’s *Nunc Pro Tunc* Request for Exclusion of March 2 – March 10, 2018 Major Outage Data for Reliability Reporting Purposes

PPL Electric Utilities Corporation (“PPL Electric Utilities” or “Company”) submits this supplemental information to its November 14, 2018 *Nunc Pro Tunc* Request for Exclusion of March 2 – March 10, 2018 Major Outage Data for Reliability Reporting Purposes (“Request for Exclusion”) and respectfully asks that the Pennsylvania Public Utility Commission (“Commission” or “PUC”) grant the Company’s Request for Exclusion for winter storm Riley/Quinn.

The Company believes its Request for Exclusion is warranted for three reasons. First, due to the severe nature of the storm event and its impact on customer service, the Riley/Quinn storm meets the definition of a “major event” set forth in 52 Pa. Code § 57.192. Second, the impact and distortion of the Company’s reliability metrics should Riley/Quinn data be required to be included in PPL Electric’s reliability metrics for the 2018 Quarterly Reliability Reports (“Reliability Reports”) would be significant. Third, the Company has taken immediate action to prevent reoccurrence of this reporting oversight in the future.

Winter storms Riley and Quinn significantly impacted the PPL Electric service territory, with the first customer interruption of electric service occurring on March 2, 2018 and the final affected customer restored on March 10, 2018. A total of 261,341 customers, approximately 18.4% of the Company’s customer base, experienced a service interruption during this event.

The Riley/Quinn storm ranks as the 9th largest event in terms of the number and duration of outages in PPL Electric’s history, and reached the threshold for “major event” status as defined in 52 Pa. Code § 57.192: “An interruption of electric service resulting from conditions beyond the control of the EDC which affects at least 10% of the customers in the EDC’s service territory during the course of the event for a duration of 5 minutes or greater.”

The Company filed its Report of Electric Service Interruptions, pursuant to the Commission’s regulations at 52 Pa. Code § 67.1, detailing storm Riley/Quinn impact and actions, as well as additional information about the event requested by Commission staff on April 12, 2018. PPL Electric then filed its first three Quarterly Reliability Reports of 2018 in a timely fashion and noted Riley/Quinn as a major event in the first quarter’s report, and excluded the storm’s data from each quarter’s Reliability Reports.

However, PPL Electric erred in not submitting a Request for Exclusion in the immediate aftermath of major event Riley/Quinn. PPL Electric maintains a Storm Reporting procedure document that details responsible actors, reporting timelines, steps for identifying storms, steps for categorizing storms, steps for data collection, steps for the drafting of reports, steps for reviewing and submitting reports, and reviewing parties and deadlines. Upon recent review, it was determined that this procedure does not stipulate the requirement to file a Request for Exclusion for major events.

PPL Electric then filed a Request for Exclusion on November 14, asking the Commission to accept the filing *Nunc Pro Tunc*. Simultaneous with this request, PPL Electric reviewed its service outage reporting procedures and is in the process of amending them to ensure Requests for Exclusion are filed properly and timely in the future. Actions to be completed by December 31, 2018 include:

- Updating of the Storm Reporting procedure to ensure compliance with all current requirements.
- Development of a ‘critical step’ checklist that will be completed for all reportable storms.

- Retraining of the reporting process for all current operating personnel involved.
- Establishment of periodic refresher training for operational personnel involved in the reporting process.
- A requirement for an annual review of the procedure itself.

PPL Electric believes it is important and relevant to note that the Company has historically requested a Request for Exclusion only for weather events when over 10% of customers experience an interruption of five minutes or greater, with the last occurring in 2012 for Hurricane Sandy. Inclusion of storm Riley/Quinn in the Company's reliability metrics would not provide an accurate comparison between the Company's 2018 reliability reports and those filed prior to 2018 as it would severely distort the Company's reliability performance for this year. In addition, it would make measurements against PUC established reliability standards and benchmarks virtually meaningless.

For example, SAIDI would be increased by a staggering 171%, CAIDI by 120% and SAIFI by 23%. Furthermore, this one event was so impactful that by not excluding Riley/Quinn data from reliability metrics, the result would see PPL Electric miss the SAIFI, SAIDI, and CAIDI benchmarks, the SAIDI and CAIDI 12 month standards, and the SAIDI and CAIDI 36 month standards for calendar year 2018:

	SAIFI	SAIDI	CAIDI
Projected without including Riley/Quinn	0.87	147	170
Projected including Riley/Quinn	1.07	399	373
Percent increase	23%	171%	120%

Projected 2018 End-of-Year Metrics

In conclusion, PPL Electric submits this supplemental information to its November 14, 2018 *Nunc Pro Tunc* filing and respectfully asks the Commission to grant the Company's request.