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April 30, 2019

VIA UNITED PARCEL SERVICE

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

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APR 30 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Joint 2018 Annual Reliability Report – Metropolitan Edison Company,
Pennsylvania Electric Company and Pennsylvania Power Company and
West Penn Power Company**

M-2016-2522508

Dear Secretary Chiavetta,

Pursuant to 52 Pa. Code § 57.195(a) and (b), enclosed for filing are two copies of the Joint 2018 Annual Reliability Report (“Joint Report”) of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (collectively, the “Companies”). Please date-stamp the additional copy and return it in the postage-paid envelope provided.

Please contact me if you have any questions.

Sincerely,

Tori L. Giesler / kbw

Tori L. Giesler

kbw
Enclosures

- c: As Per Certificate of Service
D. Searfoorce – Bureau of Technical Utility Services (via electronic and first class mail)
D. Washko – Bureau of Technical Utility Services (via electronic and first class mail)
J. Van Zant – Bureau of Technical Utility Services (via electronic and first class mail)

Met-Ed

A FirstEnergy Company

Penelec

A FirstEnergy Company

PennPower

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**WestPenn
Power**

A FirstEnergy Company



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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Joint 2018 Annual Reliability Report

Metropolitan Edison Company,
Pennsylvania Electric Company,
Pennsylvania Power Company,
And West Penn Power Company

Pursuant to 52 Pa. Code § 57.195(a) and (b)

**Joint 2018 Annual Reliability Report
Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power
Company, and West Penn Power Company
Pursuant to 52 Pa. Code Chapter § 57.195(a) and (b)**

The following Joint 2018 Report (“Report”) is submitted to the Pennsylvania Public Utility Commission (“PaPUC” or “Commission”) on behalf of Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (collectively, the “Companies”).

Section 57.195(b)(1) *An overall current assessment of the state of the system reliability in the EDC’s service territory including a discussion of the EDC’s current programs and procedures for providing reliable electric service.*

The Companies serve more than two million Pennsylvania customers and their service territory covers more than 20,000 square miles. From the physical field employees up to and including top management, the Companies are committed to providing customers with safe and reliable electric service. Methods to improve the efficiency, adequacy and reliability of the distribution system are a continual focus and every employee has an investment in each of the Companies’ respective reliability metrics. The Companies utilize core programs to support cost-effective and reliable service. These programs include, but are not limited to:

- Inspection and Maintenance
 - The Distribution Inspection & Maintenance (I&M) Practices¹ are designed to assist in determining the need for, and prioritization of, the repair or replacement of distribution system components and facilities.
- Vegetation Management
 - Routine cycle tree trimming removes selected incompatible trees within the clearing zone corridor, removes certain defective limbs that are overhanging primary conductors, controls selected incompatible brush, and removes off right-of-way priority trees.²

¹ Pursuant to 52 Pa. Code § 57.198(a), every two years an electric distribution company shall file with the Commission a biennial plan for the periodic inspection, maintenance, repair and replacement of its facilities. The Companies submitted their Biennial Inspection, Maintenance, Repair and Replacement Plan for the period January 1, 2019 through December 31, 2020 on September 29, 2017, which was deemed approved pursuant to 52 Pa. Code § 57.198(i).

² Trees located off the right-of-way that are either dead, diseased, declining, structurally compromised, severely leaning or significantly encroaching onto the right-of-way.

- Enhanced tree trimming complements the routine cycle tree trimming by removing healthy limbs overhanging primary conductors on areas where it's determined to be beneficial.
- In response to damage caused by the Emerald Ash Borer, a program to proactively remove Ash Trees off right-of-way was implemented.
- Post-storm circuit patrols target the areas with high tree-related outages. Circuit patrols identify trees damaged in a storm that may eventually lead a future outage. Once identified, the tree is removed. In addition, damaged equipment identified as part of the circuit patrol is repaired or replaced.
- Customers Experiencing Multiple Interruptions (“CEMI”)
 - The CEMI program is aimed to reduce frequent or repeated outages for affected clusters of customers or frequently operated devices.
- Load Forecasting and Distribution Planning
 - The load forecasting application is used to estimate future substation and circuit loading based upon historical load data and the planning criteria guidelines are then used to provide a consistent approach for planning the safe, reliable, orderly, and economic expansion of the distribution system.
- Circuit Protection
 - The circuit protection practices are aimed at achieving safety and security for the public and employees, maximizing service reliability to customers, minimizing damage to distribution equipment, and establishing a consistent process and set of application standards for distribution circuit protection.
- Long-Term Infrastructure Improvement Plans (“LTIIIP”)
 - The Companies first began to execute their respective LTIIIP programs in 2016. These plans include expenditures and programs designed to adequately maintain and improve the efficiency, safety, adequacy and reliability of the distribution system. Most recently, the Companies filed modifications for the 2019 program year to increase overall spending.

In addition to the reliability programs above, the Companies also utilize various strategies to efficiently respond to customer and equipment outages. These include, but are not limited to:

- **Minimizing Outage Impact**
 - The Companies incorporate design philosophies that support grid operation resulting in maximized reliability. These philosophies include instantaneous breaker tripping on select circuits, circuit sectionalizing devices, and remote device operation (such as supervisory control and data acquisition) to minimize the impact of an outage when possible.
- **Storm Exercises**
 - Each Company performs an annual storm exercise. A well-designed exercise provides a low-risk environment to test and validate capabilities, familiarize personnel with plans, procedures, roles, and responsibilities, and foster meaningful interaction and communication across internal and external organizations.
- **Smart Meters**
 - The Companies continue to deploy smart meters to customers across Pennsylvania. The Penn Power and Penelec mass deployment is complete and the Met-Ed and West Penn deployment continues. Smart meter installation is a step toward a more modernized electric system that will enable automated meter readings. Smart meters also assist during outage restoration periods, especially when there are a significant number of single customer outages, by allowing the Companies to ping the meter to determine if a customer has been restored.
- **Incident Command System (“ICS”)**
 - The Companies are beginning to utilize a more formalized ICS structure, which is designed to enable effective and efficient incident management by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organization. By expanding the use of ICS, the Companies’ incident response ability is improved, and reliability is enhanced by utilizing a common system for incident response personnel (both intrastate and interstate).

To support best industry practices, the Companies participate in various external organizations such as the Electric Power Research Institute, the Institute of Electrical and Electronics Engineers, and the Energy Association of Pennsylvania, which focus on topics like reliability, power quality, regulatory issues, distribution planning, vegetation management, risk mitigation, distributed energy resources and more. Lastly, to ensure continuous improvement, the Companies formed a

team comprised of reliability engineers to perform an internal review of reliability projects, expenditures, and performance, and to develop an overarching strategy for long-term reliability maintenance and improvement.

In 2018, the Companies generally met the twelve-month standard for System Average Interruption Duration Index (“SAIDI”), System Average Interruption Frequency Index (“SAIFI”), and Customer Average Interruption Duration Index (“CAIDI”).³ The top outage causes continue to be trees, mainly from outside the right-of-way, and equipment failure. The Companies are using the strategies and tools, as laid out above, to address these outage causes and continue to make improvements to reliability performance.

³ There are two exceptions. Penelec did not meet its twelve-month SAIFI standard and Penn Power did not meet its twelve-month CAIDI standard.

Reliability Results

The table below, taken from the 4th Quarter 2018 Joint Reliability Report, shows that ten of twelve reliability indices in 2018 were better than the Commission’s twelve-month standards with two of the indices being better than benchmark.

| 4Q 2018 (12-Mo Rolling) | Met-Ed | | | Penelec | | | Penn Power | | | West Penn | | |
|---|------------|-------------------|-----------------|-------------|-------------------|------------------|------------|-------------------|-------------------|-------------|-------------------|-----------------|
| | Benchmark | 12-Month Standard | 12-Month Actual | Benchmark | 12-Month Standard | 12-Month Actual | Benchmark | 12-Month Standard | 12-Month Actual | Benchmark | 12-Month Standard | 12-Month Actual |
| SAIFI | 1.15 | 1.38 | 1.27 | 1.26 | 1.52 | 1.71 | 1.12 | 1.34 | 1.10 ⁴ | 1.05 | 1.26 | 1.22 |
| CAIDI | 117 | 140 | 130 | 117 | 141 | 114 ⁵ | 101 | 121 | 138 | 170 | 204 | 171 |
| SAIDI | 135 | 194 | 165 | 148 | 213 | 195 | 113 | 162 | 152 | 179 | 257 | 209 |
| MAIFI⁶ | | | 1.71 | | | 2.82 | | | 0.22 | | | |
| Customers Served⁷ | 565,359 | | | 580,198 | | | 163,633 | | | 716,367 | | |
| Number of Sustained Interruptions | 11,367 | | | 13,771 | | | 3,382 | | | 13,689 | | |
| Customers Affected | 718,902 | | | 993,665 | | | 180,247 | | | 874,505 | | |
| Customer Minutes | 93,214,096 | | | 113,145,011 | | | 24,939,341 | | | 149,491,577 | | |
| Number of Customer Momentary Interruptions | 963,949 | | | 1,637,726 | | | 36,404 | | | | | |

⁴ Penn Power’s SAIFI achieved benchmark performance or better.

⁵ Penelec’s CAIDI achieved benchmark performance or better.

⁶ MAIFI values are not available for West Penn.

⁷ Represents the average number of customers served during the reporting period.

Section 57.195(b)(2) *A description of each major event that occurred during the year being reported on, including the time and duration of the event, the number of customers affected, the cause of the event and any modified procedures adopted to avoid or minimize the impact of similar events in the future.*⁸

Major Events

| FirstEnergy Company | Customers Affected | Time and Duration of the Event | | Cause of the Event | Commission Approval Status |
|---------------------|--------------------|--------------------------------|------------------------|-------------------------------|----------------------------|
| Penelec | 187 | Duration | 24 hours, 57 minutes | Flooding | Approved April 10, 2018 |
| | | Start Date/Time | January 12, 2018 1201 | | |
| | | End Date/Time | January 13, 2018 1258 | | |
| Penn Power | 2,456 | Duration | 20 hours, 35 minutes | Substation transformer fuse | Approved May 17, 2018 |
| | | Start Date/Time | January 18, 2018 2243 | | |
| | | End Date/Time | January 19, 2018 1918 | | |
| Met-Ed | 408 | Duration | 28 hours, 11 minutes | Flooding | Approved April 6, 2018 |
| | | Start Date/Time | January 23, 2018 1503 | | |
| | | End Date/Time | January 24, 2018 1914 | | |
| West Penn | 194 | Duration | 18 hours, 39 minutes | Flooding | Approved May 16, 2018 |
| | | Start Date/Time | February 15, 2018 1847 | | |
| | | End Date/Time | February 16, 2018 1326 | | |
| Penelec | 76,703 | Duration | 97 hours, 20 minutes | Winter Storm Riley | Approved May 10, 2018 |
| | | Start Date/Time | March 1, 2018 1830 | | |
| | | End Date/Time | March 5, 2018 1950 | | |
| Met-Ed | 273,398 | Duration | 230 hours, 15 minutes | Winter Storms Riley and Quinn | Approved May 6, 2018 |
| | | Start Date/Time | March 2, 2018 0600 | | |
| | | End Date/Time | March 11, 2018 2015 | | |
| Penelec | 62,262 | Duration | 64 hours, 49 minutes | Thunderstorms and high winds | Approved June 14, 2018 |
| | | Start Date/Time | April 3, 2018 2126 | | |
| | | End Date/Time | April 6, 2018 1415 | | |

⁸ For purposes of this Joint Report, all reliability figures are based upon the Pennsylvania Public Utility Commission's definitions for momentary outages and major events pursuant to 52 Pa. Code § 57.192.

| FirstEnergy Company | Customers Affected | Time and Duration of the Event | | Cause of the Event | Commission Approval Status |
|---------------------|--------------------|--------------------------------|-------------------------|-----------------------------|----------------------------|
| | | Duration | Start Date/Time | | |
| Met-Ed | 111,894 | Duration | 126 hours, 17 minutes | Thunderstorms | Approved July 9, 2018 |
| | | Start Date/Time | May 15, 2018 1428 | | |
| | | End Date/Time | May 20, 2018 2045 | | |
| West Penn | 1,122 | Duration | 19 hours, 35 minutes | Flooding | Approved August 8, 2018 |
| | | Start Date/Time | June 20, 2018 1716 | | |
| | | End Date/Time | June 21, 2018 1251 | | |
| Penn Power | 24,867 | Duration | 26 minutes | Y-300 69 kV breaker failure | Approved August 24, 2018 |
| | | Start Date/Time | June 23, 2018 1119 | | |
| | | End Date/Time | June 23, 2018 1145 | | |
| Met-Ed | 62,511 | Duration | 145 hours, 25 minutes | Heavy rains | Pending ⁹ |
| | | Start Date/Time | July 21, 2018 1530 | | |
| | | End Date/Time | July 27, 2018 1655 | | |
| Penelec | 2,863 | Duration | 85 hours, 3 minutes | Flooding | Approved October 4, 2018 |
| | | Start Date/Time | August 13, 2018 0753 | | |
| | | End Date/Time | August 16, 2018 2056 | | |
| West Penn | 72,408 | Duration | 116 hours, 25 minutes | Tropical Storm Gordon | Pending ¹⁰ |
| | | Start Date/Time | September 8, 2018 0340 | | |
| | | End Date/Time | September 13, 2018 0005 | | |
| West Penn | 75,332 | Duration | 141 hours, 14 minutes | Freezing rain, ice and snow | Approved January 4, 2019 |
| | | Start Date/Time | November 15, 2018 1213 | | |
| | | End Date/Time | November 21, 2018 0927 | | |
| Penn Power | 43,919 | Duration | 101 hours, 41 minutes | Snow and ice | Approved January 4, 2019 |
| | | Start Date/Time | November 15, 2018 1257 | | |
| | | End Date/Time | November 19, 2018 1838 | | |

⁹ Met-Ed filed a major event exclusion request on September 5, 2018 which was denied by the Pennsylvania Public Utility Commission in a Secretarial letter dated September 25, 2018. Met-Ed filed a Petition for Appeal on October 5, 2018. The matter has been referred to the Bureau of Technical Utility Services for additional review. Reliability metrics within this report contain customers interrupted and customer minutes interrupted associated with the event.

¹⁰ West Penn filed a major event exclusion request on October 8, 2018 which was denied by the Pennsylvania Public Utilities Commission in a Secretarial Letter dated October 26, 2018. West Penn filed a Petition for Appeal on November 5, 2018. The matter has been referred to the Bureau of Technical Utility Services for additional review. Reliability metrics within this report contain customers interrupted and customer minutes interrupted associated with the event.

Section 57.195(b)(3) *A table showing the actual values of each of the reliability indices (SAIFI, CAIDI, SAIDI, and if available, MAIFI) for the EDC's service territory for each of the preceding 3 calendar years. The report shall include the data used in calculating the indices, namely the average number of customers served, the number of sustained customer minutes interruptions, the number of customers affected and the minutes of interruption. If MAIFI values are provided, the number of customer momentary interruptions shall also be reported.*

Reliability Indices

| Historic 12-Month Rolling Reliability Indices | | | | |
|--|--------------------------------|-------------|-------------|-------------|
| | Index | 2016 | 2017 | 2018 |
| Met-Ed | SAIFI | 1.44 | 1.47 | 1.27 |
| | CAIDI | 124 | 147 | 130 |
| | SAIDI | 178 | 217 | 165 |
| | MAIFI | 1.10 | 1.29 | 1.71 |
| | Customer Minutes | 99,559,235 | 121,882,261 | 93,214,096 |
| | Customers Affected | 804,947 | 827,461 | 718,902 |
| | Minutes of Interruption | 2,627,337 | 3,469,122 | 3,175,276 |
| | Customers Served ¹¹ | 558,363 | 561,039 | 565,359 |
| Penelec | SAIFI | 1.43 | 1.73 | 1.71 |
| | CAIDI | 120 | 138 | 114 |
| | SAIDI | 171 | 239 | 195 |
| | MAIFI | 3.85 | 3.76 | 2.82 |
| | Customer Minutes | 99,584,395 | 138,523,052 | 113,145,011 |
| | Customers Affected | 833,315 | 1,001,129 | 993,665 |
| | Minutes of Interruption | 2,806,020 | 3,540,860 | 3,461,761 |
| | Customers Served ¹² | 581,260 | 580,349 | 580,198 |
| Penn Power | SAIFI | 1.09 | 1.06 | 1.10 |
| | CAIDI | 95 | 150 | 138 |
| | SAIDI | 104 | 160 | 152 |
| | MAIFI | 0.81 | 0.89 | 0.22 |
| | Customer Minutes | 16,841,199 | 26,001,026 | 24,939,341 |
| | Customers Affected | 176,968 | 173,036 | 180,247 |
| | Minutes of Interruption | 703,768 | 1,196,734 | 1,009,636 |
| | Customers Served ¹³ | 161,850 | 162,868 | 163,633 |

¹¹ Represents the average number of customers served during the reporting period.

¹² Represents the average number of customers served during the reporting period.

¹³ Represents the average number of customers served during the reporting period.

| Historic 12-Month Rolling Reliability Indices | | | | |
|--|--------------------------------|-------------|-------------|-------------|
| | Index | 2016 | 2017 | 2018 |
| West Penn | SAIFI | 1.08 | 1.29 | 1.22 |
| | CAIDI | 147 | 166 | 171 |
| | SAIDI | 159 | 214 | 209 |
| | Customer Minutes | 113,097,150 | 152,701,813 | 149,491,577 |
| | Customers Affected | 772,206 | 919,673 | 874,505 |
| | Minutes of Interruption | 3,263,252 | 4,589,540 | 5,168,949 |
| | Customers Served ¹⁴ | 712,703 | 714,821 | 716,367 |

The tables below show that four of twelve reliability indices in 2018 were better than the Commission's three-year standards.

| <i>Three-Year Rolling Year-End 2018</i> | Met-Ed | | Penelec | |
|---|----------------------------|--------------------------|----------------------------|--------------------------|
| | Three-Year Standard | Three-Year Actual | Three-Year Standard | Three-Year Actual |
| SAIFI | 1.27 | 1.39 | 1.39 | 1.62 |
| CAIDI | 129 | 134 | 129 | 124 |
| SAIDI | 163 | 187 | 179 | 202 |

| <i>Three-Year Rolling Year-End 2018</i> | Penn Power | | West Penn | |
|---|----------------------------|--------------------------|----------------------------|--------------------------|
| | Three-Year Standard | Three-Year Actual | Three-Year Standard | Three-Year Actual |
| SAIFI | 1.23 | 1.08 | 1.16 | 1.20 |
| CAIDI | 111 | 128 | 187 | 161 |
| SAIDI | 136 | 139 | 217 | 194 |

¹⁴ Represents the average number of customers served during the reporting period.

Section 57.195(b)(4) *A breakdown and analysis of outage causes during the year being reported on, including the number and percentage of service outages, the number of customers interrupted, the customer interruption minutes categorized by outage cause such as equipment failure, animal contact, tree related, and so forth. Proposed solutions to identified service problems shall be reported.*

Outages by Cause

Outages by Cause – Met-Ed

| Outage by Cause | | | | |
|--------------------------------------|---------------------|---|-----------------------|-----------------------------------|
| 4th Quarter 2018 12-Month Rolling | Met-Ed | | | |
| Cause | Customer Minutes | Number of Sustained Interruptions | Customers Affected | % Based on Customer Minutes |
| Trees off ROW - tree | 30,734,394 | 1,795 | 137,942 | 32.97% |
| Equipment failure | 20,088,736 | 2,754 | 168,925 | 21.55% |
| Vehicle | 8,240,190 | 295 | 60,087 | 8.84% |
| Unknown | 7,118,836 | 1,412 | 83,214 | 7.64% |
| Line failure | 6,925,441 | 958 | 45,505 | 7.43% |
| Forced outage | 4,179,426 | 413 | 69,522 | 4.48% |
| Trees off ROW - limb | 3,498,025 | 481 | 24,945 | 3.75% |
| Animal | 3,476,471 | 1,618 | 34,164 | 3.73% |
| Lightning | 2,866,144 | 255 | 25,270 | 3.07% |
| Trees on ROW | 1,898,356 | 301 | 7,887 | 2.04% |
| Human error - non-company | 1,002,114 | 74 | 12,704 | 1.08% |
| Overload | 710,440 | 49 | 5,820 | 0.76% |
| Human error - company | 599,727 | 44 | 16,745 | 0.64% |
| Bird | 440,840 | 319 | 4,886 | 0.47% |
| Trees - sec/service | 381,998 | 436 | 1,016 | 0.41% |
| Object contact with line | 346,796 | 40 | 6,179 | 0.37% |
| Other utility - non-electric | 163,996 | 6 | 2,380 | 0.18% |
| Previous lightning | 154,459 | 19 | 1,153 | 0.17% |
| UG dig-up | 116,292 | 26 | 462 | 0.12% |
| Wind | 92,513 | 10 | 162 | 0.10% |
| Other electric utility | 68,872 | 13 | 6,180 | 0.07% |
| Customer equipment | 62,374 | 26 | 3,446 | 0.07% |
| Fire | 31,629 | 8 | 162 | 0.03% |
| Ice | 11,780 | 7 | 131 | 0.01% |
| Vandalism | 2,487 | 5 | 9 | 0.00% |
| Switching error | 1,344 | 1 | 4 | 0.00% |
| Contamination | 416 | 2 | 2 | 0.00% |
| Total | 93,214,096 | 11,367 | 718,902 | 100% |

Proposed Solutions – Met-Ed

Met-Ed analyzes its outage data to develop solutions for improving reliability. The following paragraphs identify the top outage causes for the rolling twelve-month period ending December 31, 2018, and associated actions designed to address these outage causes.

To address outages caused by trees, Met-Ed performs cycle-based tree trimming and enhanced tree trimming in select locations. Enhanced tree trimming removes healthy limbs overhanging primary conductors. Trees identified as a potential cause of a future outage are removed to prevent an interruption of electrical service to Met-Ed's customers. Met-Ed continues its cycle-based program to mitigate trees subject to damage from the Emerald Ash Borer.

To reduce the likelihood of equipment-caused outages, Met-Ed follows I&M programs that are geared towards specific components such as capacitors, poles, circuits, transformers, radio-controlled switches, substations, and reclosers. Equipment identified is repaired or replaced as appropriate.

Met-Ed reviews vehicle caused outages to identify repeat locations warranting remedial action, which could include modifying attachment height for communications, installing a taller pole, relocating the pole or installing sectionalizing equipment to minimize customer impact.

Outages by Cause – Penelec

| Outage by Cause | | | | |
|--|-----------------------------|--|-------------------------------|--|
| 4th Quarter 2018 12-Month Rolling | Penelec | | | |
| Cause | Customer Minutes | Number of Sustained Interruptions | Customers Affected | % Based on Customer Minutes |
| Trees off ROW - tree | 38,229,095 | 1,544 | 197,922 | 33.79% |
| Equipment failure | 25,131,347 | 3,083 | 296,123 | 22.21% |
| Line failure | 13,521,894 | 1,414 | 119,043 | 11.95% |
| Unknown | 6,674,113 | 2,008 | 83,075 | 5.90% |
| Forced outage | 6,632,570 | 1,034 | 72,366 | 5.86% |
| Vehicle | 5,964,286 | 305 | 46,703 | 5.27% |
| Lightning | 3,555,876 | 748 | 33,274 | 3.14% |
| Animal | 3,502,715 | 1,567 | 31,637 | 3.10% |
| Trees off ROW - limb | 1,880,421 | 310 | 16,787 | 1.66% |
| Human error - company | 1,799,328 | 99 | 36,535 | 1.59% |
| Bird | 976,266 | 361 | 16,536 | 0.86% |
| Overload | 886,436 | 85 | 19,978 | 0.78% |
| Wind | 808,644 | 8 | 1,959 | 0.71% |
| Human error - non-company | 788,418 | 82 | 5,520 | 0.70% |
| Object contact with line | 573,211 | 36 | 1,675 | 0.51% |
| Trees - sec/service | 470,414 | 609 | 1,799 | 0.42% |
| Trees on ROW | 361,148 | 108 | 3,573 | 0.32% |
| Ice | 302,919 | 135 | 2,126 | 0.27% |
| Other electric utility | 280,647 | 85 | 1,705 | 0.25% |
| Other utility - non-electric | 218,276 | 4 | 697 | 0.19% |
| Previous lightning | 199,498 | 37 | 970 | 0.18% |
| UG dig-up | 180,580 | 55 | 1,648 | 0.16% |
| Fire | 106,850 | 14 | 912 | 0.09% |
| Contamination | 48,910 | 7 | 122 | 0.04% |
| Switching Error | 36,820 | 4 | 909 | 0.03% |
| Customer equipment | 10,885 | 10 | 52 | 0.01% |
| Vandalism | 3,444 | 19 | 19 | 0.00% |
| Total | 113,145,011 | 13,771 | 993,665 | 100% |

Proposed Solutions – Penelec

Penelec analyzes its outage data to develop solutions for improving reliability. The following paragraphs identify the top outage causes for the rolling twelve-month period ending December 31, 2018, and the associated actions designed to address these outage causes.

To reduce outages caused by trees, Penelec performs cycle-based tree trimming which removes selected incompatible trees within the clearing zone corridor, removes certain defective limbs that are overhanging primary conductors, controls selected incompatible brush, and removes off right-of-way priority trees.

To reduce the likelihood of outages caused by equipment and line failure, Penelec follows I&M programs that set forth schedules for regular inspections of distribution and substation facilities. These programs are geared towards specific components such as capacitors, poles, circuits, transformers, radio-controlled switches, substations, and reclosers. Equipment identified is repaired or replaced as appropriate.

Outages by Cause – Penn Power

| Outage by Cause | | | | |
|--|-----------------------------|--|-------------------------------|--|
| 4th Quarter 2018 12-Month Rolling | Penn Power | | | |
| Cause | Customer Minutes | Number of Sustained Interruptions | Customers Affected | % Based on Customer Minutes |
| Trees off ROW - tree | 10,123,540 | 749 | 39,067 | 40.59% |
| Vehicle | 3,170,655 | 102 | 14,230 | 12.71% |
| Equipment failure | 2,385,778 | 344 | 23,747 | 9.57% |
| Line failure | 1,924,304 | 325 | 12,920 | 7.72% |
| Animal | 1,920,215 | 502 | 22,287 | 7.70% |
| Trees off ROW - limb | 1,372,430 | 187 | 8,138 | 5.50% |
| Unknown | 1,142,810 | 208 | 16,146 | 4.58% |
| Lightning | 741,694 | 219 | 9,635 | 2.97% |
| Overload | 621,616 | 69 | 7,929 | 2.49% |
| Bird | 484,057 | 308 | 5,516 | 1.94% |
| Forced outage | 294,948 | 84 | 8,254 | 1.18% |
| Human error - non-company | 227,079 | 26 | 2,163 | 0.91% |
| Previous lightning | 198,586 | 28 | 7,121 | 0.80% |
| Trees - sec/service | 140,931 | 150 | 429 | 0.57% |
| Human error - company | 86,281 | 20 | 1,604 | 0.35% |
| UG dig-up | 34,888 | 16 | 385 | 0.14% |
| Trees on ROW | 27,740 | 18 | 255 | 0.11% |
| Object contact with line | 22,376 | 7 | 246 | 0.09% |
| Ice | 15,564 | 7 | 140 | 0.06% |
| Vandalism | 2,633 | 3 | 25 | 0.01% |
| Customer equipment | 1,151 | 9 | 9 | 0.00% |
| Fire | 65 | 1 | 1 | 0.00% |
| Total | 24,939,341 | 3,382 | 180,247 | 100% |

Proposed Solutions – Penn Power

Penn Power analyzes its outage data to develop solutions for improving reliability. The following paragraphs identify the top outage causes for the rolling twelve-month period ending December 31, 2018, and the associated actions designed to address these outage causes.

To address outages caused by trees, Penn Power performs cycle-based tree trimming which removes selected incompatible trees within the clearing zone corridor, removes certain defective limbs that are overhanging primary conductors, controls selected incompatible brush, and removes off right-of-way priority trees. In addition, Penn Power performs enhanced trimming, which removes healthy limbs overhanging primary conductors.

Penn Power reviews each vehicle caused outage to determine if it is a repeat location warranting remedial action, which could include modifying attachment height for communications, installing a taller pole or relocating the pole.

To reduce the likelihood of outages caused by equipment failure, Penn Power follows I&M programs that set forth schedules for regular inspections of distribution facilities. These programs are geared towards specific components such as capacitors, poles, circuits, transformers, and reclosers. Equipment identified is repaired or replaced as appropriate.

Outages by Cause – West Penn

| Outage by Cause | | | | |
|--|-----------------------------|--|-------------------------------|--|
| 4th Quarter 2018 12-Month Rolling | West Penn | | | |
| Cause | Customer Minutes | Number of Sustained Interruptions | Customers Affected | % Based on Customer Minutes |
| Trees off ROW - tree | 62,332,133 | 3,242 | 251,187 | 41.70% |
| Equipment failure | 20,174,866 | 2,851 | 157,338 | 13.50% |
| Line failure | 16,651,588 | 1,412 | 109,762 | 11.14% |
| Wind | 12,297,358 | 140 | 18,231 | 8.23% |
| Vehicle | 9,748,591 | 343 | 62,159 | 6.52% |
| Unknown | 7,694,032 | 1,821 | 73,889 | 5.15% |
| Trees on ROW | 4,411,822 | 464 | 20,044 | 2.95% |
| Forced outage | 4,319,946 | 747 | 75,034 | 2.89% |
| Trees off ROW - limb | 3,615,794 | 226 | 24,129 | 2.42% |
| Lightning | 1,905,176 | 111 | 15,249 | 1.27% |
| Animal | 1,882,491 | 1,293 | 19,643 | 1.26% |
| Bird | 786,263 | 307 | 8,618 | 0.53% |
| Human error - company | 763,674 | 57 | 12,477 | 0.51% |
| Other utility - non-electric | 511,290 | 3 | 2,046 | 0.34% |
| Human error - non-company | 477,246 | 63 | 5,659 | 0.32% |
| Trees - sec/service | 379,163 | 439 | 899 | 0.25% |
| Other electric utility | 320,286 | 14 | 1,984 | 0.21% |
| Overload | 292,226 | 25 | 5,488 | 0.20% |
| UG dig-up | 195,401 | 47 | 1,075 | 0.13% |
| Object contact with line | 195,340 | 43 | 1,710 | 0.13% |
| Customer equipment | 181,775 | 20 | 1,111 | 0.12% |
| Vandalism | 167,037 | 5 | 2,621 | 0.11% |
| Contamination | 154,920 | 8 | 3,358 | 0.10% |
| Switching error | 21,996 | 2 | 716 | 0.01% |
| Fire | 10,143 | 5 | 63 | 0.01% |
| Previous Lightning | 1,020 | 1 | 15 | 0.00% |
| Total | 149,491,577 | 13,689 | 874,505 | 100% |

Proposed Solutions – West Penn

West Penn analyzes its outage data to develop solutions for improving reliability. The following paragraphs identify the top outage causes for the rolling twelve-month period ending December 31, 2018, and the associated actions designed to address these outage causes.

To reduce outages caused by trees, West Penn performs cycle-based tree trimming which removes selected incompatible trees within the clearing zone corridor, removes certain defective limbs that are overhanging primary conductors, controls selected incompatible brush, and removes off right-of-way priority trees. West Penn continues its mitigation program of trees subject to damage from the Emerald Ash Borer through its normal cycle program.

To reduce the likelihood of outages caused by equipment and line failure, West Penn follows I&M programs that set forth schedules for regular inspections of distribution and substation facilities. These programs are geared towards specific components such as capacitors, poles, circuits, transformers, substations, and reclosers. Equipment identified is repaired or replaced as appropriate.

Section 57.195(b)(5) A list of the major remedial efforts taken to date and planned for circuits that have been on the worst performing 5% of circuits list for a year or more.

Worst Performing Circuits – Remedial Actions

Met-Ed, Penelec, Penn Power, and West Penn's Remedial Actions for Worst Performing Circuits are provided in Attachment A of this report.

Section 57.195(b)(6) *A comparison of established transmission and distribution inspections and maintenance goals/objectives versus actual results achieved during the year being reported on. Explanations of any variances shall be included.*

T&D Inspection and Maintenance Programs

| Inspection and Maintenance 2018 | | Met-Ed | | Penelee | | Penn Power | | West Penn | |
|------------------------------------|--------------------------------|---------------------|------------------|----------------------|-------------------|---|-----------|--|-----------|
| | | Planned | Completed | Planned | Completed | Planned | Completed | Planned | Completed |
| Forestry | Transmission (Miles) | 258.67 | 258.67 | 418.26 ¹⁵ | 418.26 | 77.87 | 77.87 | 527.98 ¹⁶ | 527.98 |
| | Distribution (Miles) | 3,160 | 3,164 | 3,636 | 4,220 | 1,149 | 1,176 | 4,584 | 4,599 |
| Transmission | Aerial Patrols | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| | Groundline | 0 | 0 | 0 | 0 | 553 | 698 | 1,330 | 1,877 |
| Substation | Substation Inspections Class A | 424 | 424 | 788 | 788 | 148 | 148 | 726 | 726 |
| | Substation Inspections Class B | 424 | 424 | 788 | 788 | 148 | 148 | 726 | 726 |
| | Substation Inspections Class C | 1,696 | 1,696 | 3,152 | 3,152 | 592 | 592 | 2,904 | 2,904 |
| | Transformers | 245 | 245 | 487 | 487 | 103 | 103 | 514 | 514 |
| | Breakers | 76 | 75 ¹⁷ | 325 | 323 ¹⁸ | 9 | 9 | 406 | 406 |
| | Relay Schemes | 98 | 98 | 176 | 176 | 16 | 16 | 123 | 123 |
| Distribution | Capacitors | 4,758 | 4,758 | 8,736 | 8,736 | 991 ¹⁹ | 991 | 1,305 | 1,305 |
| | Poles | 46,000 | 46,026 | 41,591 | 42,118 | 10,600 | 11,066 | 57,822 | 58,024 |
| | Reclosers | 1,098 ²⁰ | 1,098 | 2,566 ²¹ | 2,566 | 812 ²² | 812 | 3,898 | 3,898 |
| | Radio-Controlled Switches | 478 | 478 | 2,708 ²³ | 2,708 | Penn Power has no radio-controlled switches | | West Penn has no radio-controlled switches | |

General Note: Unless specified otherwise, all inspections are reported on a unit basis rather than on a location basis.

¹⁵ Transmission miles trimmed increased by 0.41 miles due to a mapping change.

¹⁶ Transmission miles trimmed increased by 0.62 miles due to a mapping change.

¹⁷ One inspection was not completed due to safety issues.

¹⁸ Two inspections have been postponed while grounding is replaced at the Blossburg Substation.

¹⁹ Three capacitors were taken out of service.

²⁰ Eleven reclosers were taken out of service.

²¹ Six reclosers were taken out of service.

²² Three reclosers were taken out of service.

²³ Radio-controlled switches increased by 96 as a result of new installations.

Section 57.195(b)(7) A comparison of budgeted versus actual transmission and distribution operation and maintenance expenses for the year being reported on in total and detailed by the EDC's own functional account code of FERC account code as available. Explanations of any variances shall be included.

Budgeted vs. Actual T&D Operation & Maintenance Expenditures

| Met-Ed T&D O&M - 2018 (\$) | | | | | |
|-------------------------------|---|---------------------|-------------------|--------|----|
| Transmission | | | | | |
| Category | 2018 Actuals | 2018 Budget | Variance % | Notes | |
| 560 | Operation Supervision and Engineering | 0 | 0 | 0% | |
| 561 | Load Dispatching | 5,774 | 680,275 | -99% | 1 |
| 562 | Station Expenses | 12,882 | 0 | 100% | 2 |
| 563 | Overhead Lines Expenses | 45,360 | 33,112 | 37% | 3 |
| 565 | Transmission of Electricity by Others | (19,635,833) | 9,193,248 | -314% | 4 |
| 566 | Miscellaneous Transmission Expenses | (180,231) | (13,365) | -1249% | 5 |
| 567 | Rents | 65,276 | 0 | 100% | 6 |
| 568 | Maintenance Supervision and Engineering | 2,655 | 0 | 100% | 7 |
| 569 | Maintenance of Structures | 197,188 | 20,225 | 875% | 8 |
| 570 | Maintenance of Station Equipment | 840,543 | 6,000 | 13909% | 9 |
| 571 | Maintenance of Overhead Lines | 126,180 | 0 | 100% | 10 |
| 572 | Transmission-Maintenance of Underground Lines | 198 | 0 | 100% | |
| 573 | Maintenance of Miscellaneous Transmission Plant | 646 | 0 | 100% | |
| 575 | Market Administration, Monitoring & Compliance Services | (0) | 0 | 0% | |
| Transmission Total | | (18,519,362) | 9,919,496 | | |
| Distribution | | | | | |
| Category | 2018 Actuals | 2018 Budget | Variance % | Notes | |
| 580 | Operation Supervision and Engineering | 339,907 | 242,700 | 40% | 11 |
| 581 | Load Dispatching | 244,323 | 203,414 | 20% | 11 |
| 582 | Station Expenses | 1,642,817 | 641,671 | 156% | 12 |
| 583 | Overhead Line Expenses | 206,780 | 197,277 | 5% | |
| 584 | Underground Line Expenses | 0 | 0 | 0% | |
| 586 | Meter Expenses | 647,025 | 597,543 | 8% | |
| 587 | Customer Installations Expenses | 0 | 0 | 0% | |
| 588 | Miscellaneous Distribution Expenses | 8,056,353 | 8,070,195 | 0% | |
| 589 | Rents | 389,783 | 504,437 | -23% | 13 |
| 590 | Maintenance Supervision and Engineering | 448,062 | 193,021 | 132% | 14 |
| 591 | Maintenance of Structures | 4,020 | 6,817 | -41% | 15 |
| 592 | Maintenance of Station Equipment | 6,105,009 | 7,591,843 | -20% | 16 |
| 593 | Maintenance of Overhead Lines | 88,817,725 | 28,894,156 | 207% | 17 |
| 594 | Maintenance of Underground Lines | 1,621,598 | 1,527,965 | 6% | |
| 595 | Maintenance of Line Transformer | 164,145 | 1,878,008 | -91% | 18 |
| 596 | Maintenance of Street Lighting and Signal Systems | 664,092 | 582,543 | 14% | 19 |
| 597 | Maintenance of Meters | 2,143,322 | 2,240,327 | -4% | |
| 598 | Maintenance of Miscellaneous Distribution Plant | 1,636,574 | 2,411,184 | -32% | 20 |
| Distribution Total | | 113,131,534 | 55,783,100 | | |
| Met-Ed Total | | 94,612,172 | 65,702,596 | | |

| Variance Explanations (Variances 10% or greater) | |
|--|---|
| 1 | Under budget due to contractor expenses being lower than planned. |
| 2 | Over budget due to substation drawing reviews being greater than planned. |
| 3 | Over budget due to annual fees for rights-of-way being greater than planned. |
| 4 | Under budget due to a settlement between Met-Ed and PJM (approved by FERC on May 31, 2018) resulted in a refund of Regional Transmission Expansion Plan expenses to Met-Ed. |
| 5 | Under budget due to PJM ancillary service expenses being lower than planned. |
| 6 | Over budget due to associated company lease/rentals for information technology and transmission personnel being greater than planned. |
| 7 | Over budget due to environmental labor expenses being greater than planned. |
| 8 | Over budget due to labor and computer software/hardware maintenance expenses being greater than planned. |
| 9 | Over budget due to allocation of budget dollars between transmission and distribution expenses. |
| 10 | Over budget due to contractor expenses for corrective maintenance being greater than planned. |
| 11 | Over budget due to labor expenses in corrective maintenance being greater than planned. |
| 12 | Over budget due to materials and contractor expenses for preventative maintenance greater than planned. |
| 13 | Under budget due to joint use pole attachment expenses being lower than planned. |
| 14 | Over budget due to labor allocations from electrification research/program support and associated contractor expenses being greater than planned. |
| 15 | Under budget due to material and supplies purchases being lower than planned. |
| 16 | Under budget due to lower than planned materials and contractors for corrective maintenance. |
| 17 | Over budget due to maintenance contract and internal labor expenses associated with major storm restoration being greater than planned. |
| 18 | Under budget due to contractor expenses being lower than planned. |
| 19 | Over budget due to labor expenses being greater than planned. |
| 20 | Under budget due to outside contractors and materials expenses being lower than planned. |

| Penelec T&D O&M - 2018 (\$) | | | | |
|--------------------------------|---|-------------------|-------------------|-------|
| Transmission | | | | |
| Category | 2018 Actuals | 2018 Budget | Variance % | Notes |
| 560 | Operation Supervision and Engineering | 0 | 0% | |
| 561 | Load Dispatching | (16,990) | -102% | 1 |
| 562 | Station Expenses | 223,982 | 65% | 2 |
| 563 | Overhead Lines Expenses | 492,213 | 0% | |
| 565 | Transmission of Electricity by Others | 1,692,468 | -95% | 3 |
| 566 | Miscellaneous Transmission Expenses | (165,092) | -100% | 4 |
| 567 | Rents | 305,764 | 11% | 5 |
| 568 | Maintenance Supervision and Engineering | 115,132 | (0) | 100% |
| 569 | Maintenance of Structures | 287,491 | 23,493 | 1124% |
| 570 | Maintenance of Station Equipment | 52,612 | 283,400 | -81% |
| 571 | Maintenance of Overhead Lines | 147,778 | 0 | 100% |
| 572 | Transmission-Maintenance of Underground Lines | 103 | 0 | 100% |
| 573 | Maintenance of Miscellaneous Transmission Plant | (309) | 0 | -100% |
| 575 | Market Administration, Monitoring & Compliance Services | (0) | 0 | 0% |
| Transmission Total | | 3,135,151 | 35,370,294 | |
| Distribution | | | | |
| Category | 2018 Actuals | 2018 Budget | Variance % | Notes |
| 580 | Operation Supervision and Engineering | 597,477 | 340,011 | 76% |
| 581 | Load Dispatching | 430,472 | 246,339 | 75% |
| 582 | Station Expenses | 649,966 | 0 | 100% |
| 583 | Overhead Line Expenses | 108,587 | 52,827 | 106% |
| 584 | Underground Line Expenses | 1,061,224 | 879,170 | 21% |
| 586 | Meter Expenses | 707,436 | 610,579 | 16% |
| 587 | Customer Installations Expenses | 0 | 0 | 100% |
| 588 | Miscellaneous Distribution Expenses | 12,195,895 | 11,971,998 | 2% |
| 589 | Rents | 2,069,138 | 1,131,717 | 83% |
| 590 | Maintenance Supervision and Engineering | 474,916 | 219,824 | 116% |
| 591 | Maintenance of Structures | 0 | 0 | 0% |
| 592 | Maintenance of Station Equipment | 7,277,631 | 6,015,575 | 21% |
| 593 | Maintenance of Overhead Lines | 52,051,940 | 30,918,994 | 68% |
| 594 | Maintenance of Underground Lines | 1,863,187 | 146,143 | 1175% |
| 595 | Maintenance of Line Transformer | 143,415 | 242,897 | -41% |
| 596 | Maintenance of Street Lighting and Signal Systems | 1,168,960 | 3,120,417 | -63% |
| 597 | Maintenance of Meters | 2,857,322 | 3,822,304 | -25% |
| 598 | Maintenance of Miscellaneous Distribution Plant | 1,355,779 | 122,860 | 1004% |
| Distribution Total | | 85,013,347 | 59,841,657 | |
| Penelec Total | | 88,148,497 | 95,211,950 | |

| Variance Explanations (Variances 10% or greater) | |
|--|---|
| 1 | Under budget due to outside services/contractors and PJM reimbursable services being lower than planned. |
| 2 | Over budget due to labor expenses being greater than planned. |
| 3 | Under budget due to a settlement between Penelec and PJM (approved by FERC on May 31, 2018) resulted in a refund of Regional Transmission Expansion Plan expenses to Penelec. |
| 4 | Under budget due to PJM ancillary service expenses being lower than planned. |
| 5 | Over budget due to leases/rentals being greater than planned. |
| 6 | Over budget due to network costs and labor requirements being greater than planned. |
| 7 | Under budget due to outside services/contractors being lower than planned. |
| 8 | Over budget due to right of way fees being greater than planned. |
| 9 | Over budget due to internal labor required to perform the work which was not budgeted to this FERC account. |
| 10 | Over budget due to labor requirements and outside services/contractors being greater than planned. |
| 11 | Over budget due to outside services/contractors being greater than planned. |
| 12 | Under budget due to labor costs being lower than planned. |
| 13 | Under budget due to fleet costs charged to O&M and labor costs being lower than planned. |

| Penn Power T&D O&M - 2018 (\$) | | | | | |
|-----------------------------------|---|--------------------|-------------------|-------|----|
| Transmission | | | | | |
| Category | 2018 Actuals | 2018 Budget | Variance % | Notes | |
| 560 | Operation Supervision and Engineering | 1,575 | 2,131 | -26% | 3 |
| 561 | Load Dispatching | 5,429 | 129,499 | -96% | 1 |
| 562 | Station Expenses | 0 | (187) | 100% | 3 |
| 563 | Overhead Lines Expenses | 12 | (325) | 104% | |
| 565 | Transmission of Electricity by Others | (5,956,922) | 4,974,660 | -220% | 2 |
| 566 | Miscellaneous Transmission Expenses | 5,290 | 3,870 | 37% | 4 |
| 567 | Rents | 0 | 0 | 100% | |
| 568 | Maintenance Supervision and Engineering | 13,497 | 16,147 | -16% | 5 |
| 569 | Maintenance of Structures | 25,418 | 33,199 | -23% | 6 |
| 570 | Maintenance of Station Equipment | (18,427) | 3,047 | -705% | 7 |
| 571 | Maintenance of Overhead Lines | 74,132 | (80,573) | 192% | 4 |
| 572 | Transmission-Maintenance of Underground Lines | 0 | 0 | 0% | |
| 573 | Maintenance of Miscellaneous Transmission Plant | (1,856) | 0 | 100% | 3 |
| 575 | Market Administration, Monitoring & Compliance Services | 0 | 0 | 0% | |
| Transmission Total | | (5,851,851) | 5,081,468 | | |
| Distribution | | | | | |
| Category | 2018 Actuals | 2018 Budget | Variance % | Notes | |
| 580 | Operation Supervision and Engineering | 0 | 0 | 0% | |
| 581 | Load Dispatching | 0 | 0 | 0% | |
| 582 | Station Expenses | 65,554 | 0 | 100% | 8 |
| 583 | Overhead Line Expenses | 120,579 | 0 | 100% | 9 |
| 584 | Underground Line Expenses | 233,838 | 524,466 | -55% | 6 |
| 586 | Meter Expenses | 64,621 | 74,938 | -14% | 10 |
| 587 | Customer Installations Expenses | 0 | 0 | 0% | |
| 588 | Miscellaneous Distribution Expenses | 591,510 | 1,079,663 | -45% | 11 |
| 589 | Rents | 332,738 | 318,986 | 4% | |
| 590 | Maintenance Supervision and Engineering | 121,333 | 54,953 | 121% | 9 |
| 591 | Maintenance of Structures | 0 | 0 | 0% | |
| 592 | Maintenance of Station Equipment | 865,319 | 376,718 | 130% | 4 |
| 593 | Maintenance of Overhead Lines | 17,134,398 | 12,374,767 | 38% | 12 |
| 594 | Maintenance of Underground Lines | 284,726 | 39,187 | 627% | 4 |
| 595 | Maintenance of Line Transformer | 30,711 | 51,489 | -40% | 6 |
| 596 | Maintenance of Street Lighting and Signal Systems | 64,367 | 0 | 100% | 4 |
| 597 | Maintenance of Meters | 513,375 | 598,980 | -14% | 6 |
| 598 | Maintenance of Miscellaneous Distribution Plant | 298,713 | 472,985 | -37% | 13 |
| Distribution Total | | 20,721,782 | 15,967,133 | | |
| Penn Power Total | | 14,869,931 | 21,048,601 | | |

| Variance Explanations (Variances 10% or greater) | |
|--|--|
| 1 | Under budget due to transmission owner scheduling, system control and dispatching costs being lower than planned. |
| 2 | Under budget due to a settlement between Penn Power and PJM (approved by FERC on May 31, 2018) resulted in a refund of Regional Transmission Expansion Plan expenses to Penn Power. |
| 3 | Current budgeting practices do not budget directly to FERC accounts. FirstEnergy Service Company budgets to different cost collectors, which settle to FERC accounts. Actual settlements to these FERC accounts are relatively immaterial amounts. |
| 4 | Over budget due to labor costs being greater than planned. |
| 5 | Under budget due to supervision and engineering costs being lower than planned. |
| 6 | Under budget due to labor expenses being lower than planned. |
| 7 | Under budget due to prior period contractor adjustments. |
| 8 | Over budget due to telecommunications expense being greater than planned. |
| 9 | Over budget due to contractor expenses being greater than planned. |
| 10 | Under budget due to labor and material expense being lower than planned. |
| 11 | Under budget due to fleet expense being lower than planned. |
| 12 | Over budget due to labor and contractor expense being greater than planned. |
| 13 | Under budget due to material expenses being lower than planned. |

| West Penn T&D O&M - 2018 (S) | | | | | |
|---------------------------------|---|--------------------|--------------------|------------|-------|
| Transmission | | | | | |
| Category | | 2018 Actuals | 2018 Budget | Variance % | Notes |
| 560 | Operation Supervision and Engineering | 44,778 | 56,519 | -21% | 1 |
| 561 | Load Dispatching | 868,568 | 1,983,587 | -56% | 2 |
| 562 | Station Expenses | 223,239 | 24,140 | 825% | 3 |
| 563 | Overhead Lines Expenses | 205,692 | 0 | 100% | 4 |
| 565 | Transmission of Electricity by Others | 117,886,509 | 60,377,974 | 95% | 5 |
| 566 | Miscellaneous Transmission Expenses | 396,465 | 352,998 | 12% | 6 |
| 567 | Rents | 24,164 | 25,187 | -4% | |
| 568 | Maintenance Supervision and Engineering | 720,375 | 558,238 | 29% | 7 |
| 569 | Maintenance of Structures | 33,325 | 17,275 | 93% | 8 |
| 570 | Maintenance of Station Equipment | 3,577,755 | 2,032,207 | 76% | 9 |
| 571 | Maintenance of Overhead Lines | 16,849,059 | 13,267,007 | 27% | 10 |
| 572 | Transmission-Maintenance of Underground Lines | (4,793) | 0 | -100% | 11 |
| 573 | Maintenance of Miscellaneous Transmission Plant | 0 | 0 | 0% | |
| 575 | Market Administration, Monitoring & Compliance Services | 227 | 0 | 100% | 11 |
| Transmission Total | | 140,825,364 | 78,695,132 | | |
| Distribution | | | | | |
| Category | | 2018 Actuals | 2018 Budget | Variance % | Notes |
| 580 | Operation Supervision and Engineering | 252,319 | 105,573 | 139% | 12 |
| 581 | Load Dispatching | 1,872,627 | 1,823,718 | 3% | |
| 582 | Station Expenses | 683,131 | 1,209,878 | -44% | 13 |
| 583 | Overhead Line Expenses | 1,089,904 | 1,429,962 | -24% | 14 |
| 584 | Underground Line Expenses | 1,393,242 | 1,210,000 | 15% | 15 |
| 586 | Meter Expenses | 1,269,671 | 1,909,499 | -34% | 16 |
| 587 | Customer Installations Expenses | 0 | 0 | 0% | |
| 588 | Miscellaneous Distribution Expenses | 16,016,074 | 14,994,284 | 7% | |
| 589 | Rents | 0 | 0 | 0% | |
| 590 | Maintenance Supervision and Engineering | 638,834 | 403,051 | 58% | 4 |
| 591 | Maintenance of Structures | 0 | 0 | 0% | |
| 592 | Maintenance of Station Equipment | 8,970,105 | 7,456,908 | 20% | 17 |
| 593 | Maintenance of Overhead Lines | 47,721,757 | 30,632,377 | 56% | 17 |
| 594 | Maintenance of Underground Lines | 1,159,393 | 753,257 | 54% | 17 |
| 595 | Maintenance of Line Transformer | 64,972 | 289,074 | -78% | 18 |
| 596 | Maintenance of Street Lighting and Signal Systems | 957,528 | 795,037 | 20% | 19 |
| 597 | Maintenance of Meters | 1,558,619 | 1,070,584 | 46% | 19 |
| 598 | Maintenance of Miscellaneous Distribution Plant | 288,040 | 238,242 | 21% | 20 |
| Distribution Total | | 83,936,215 | 64,321,443 | | |
| West Penn Total | | 224,761,579 | 143,016,574 | | |

| Variance Explanations (Variances 10% or greater) | |
|--|--|
| 1 | Under budget due to labor costs being lower than planned. |
| 2 | Under budget due to contractor costs being lower than planned. |
| 3 | Over budget due to internal labor, transportation, material, and employee expense costs being greater than planned. |
| 4 | Over budget due to internal labor, contractor, and material costs being greater than planned. |
| 5 | Over budget due to a settlement between West Penn and PJM (approved by FERC on May 31, 2018) resulted in additional Regional Transmission Expansion Plan costs to West Penn. |
| 6 | Over budget due to contractor costs being greater than planned. |
| 7 | Over budget due to internal labor and contractor costs being greater than planned. |
| 8 | Over budget due to information technology labor costs being greater than planned. |
| 9 | Over budget due to internal labor, contractor, material, and transportation costs being greater than planned. |
| 10 | Over budget due to internal labor, contractor and transportation costs for tree-trimming being greater than planned. |
| 11 | Current budgeting practices do not budget directly to FERC accounts. FirstEnergy budgets to different cost collectors, which settle to FERC accounts. Actual settlements to these FERC accounts are relatively immaterial amounts. |
| 12 | Over budget due to contractor, material, and employee expenses being greater than planned. |
| 13 | Under budget due to internal labor and transportation costs being lower than planned. |
| 14 | Under budget due to internal labor, contractor, and transportation costs being lower than planned. |
| 15 | Over budget due to contractor and administration and general costs for underground locating being greater than planned. |
| 16 | Under budget due to internal labor and material costs being lower than planned. |
| 17 | Over budget due to internal labor, contractor and transportation costs being greater than planned. |
| 18 | Under budget due to internal labor being lower than planned. |
| 19 | Over budget due to internal labor and transportation costs being greater than planned. |
| 20 | Over budget due to internal labor and computer software maintenance costs being greater than planned. |

Section 57.195(b)(8) *A comparison of budgeted versus actual transmission and distribution operation and maintenance capital expenses for the year being reported on in total and detailed by the EDC's own functional account code or FERC account code as available. Explanations of any variances 10% or greater shall be included.*

Budgeted vs. Actual T&D Capital Expenditures

| Met-Ed T&D Capital – 2018 (\$) | | | | |
|-----------------------------------|--------------------|--------------------|------------|-------|
| Category | 2018 Actuals | 2018 Budget | Variance % | Notes |
| Capacity | 6,156,633 | 12,046,796 | -49% | 1 |
| Condition | 15,222,702 | 15,210,656 | 0% | |
| Facilities | 5,158,813 | 4,029,172 | 28% | 2 |
| Forced | 53,535,582 | 36,042,546 | 49% | 3 |
| Meter Related | 1,880,385 | 2,657,061 | -29% | 4 |
| New Business | 15,470,477 | 14,256,019 | 9% | |
| Other | 48,782,772 | 39,834,720 | 22% | 5 |
| Reliability | 21,987,793 | 24,345,555 | -10% | 6 |
| Street Light | 1,060,254 | 2,048,961 | -48% | 7 |
| Tools & Equip | 780,532 | 1,165,919 | -33% | 8 |
| Vegetation Mgt. | 11,995,062 | 16,163,160 | -26% | 9 |
| Met-Ed Total | 182,031,004 | 167,800,564 | | |

General Note: Capital reported on Generally Accepted Accounting Principles (GAAP) basis.

| Penelec T&D Capital – 2018 (\$) | | | | |
|------------------------------------|--------------------|--------------------|------------|-------|
| Category | 2018 Actuals | 2018 Budget | Variance % | Notes |
| Capacity | 3,298,394 | 6,993,475 | -53% | 10 |
| Condition | 7,983,054 | 9,625,735 | -17% | 11 |
| Facilities | 3,757,894 | 2,558,659 | 47% | 12 |
| Forced | 39,311,136 | 43,150,174 | -9% | |
| Meter Related | 1,568,530 | 2,468,478 | -36% | |
| New Business | 8,292,862 | 11,979,604 | -31% | 13 |
| Other | 48,305,374 | 18,159,603 | 166% | 14 |
| Reliability | 40,808,225 | 47,667,106 | -14% | 15 |
| Street Light | 1,587,616 | 2,090,990 | -24% | 16 |
| Tools & Equip | 1,696,584 | 1,438,392 | 18% | 17 |
| Vegetation Mgt. | 22,495,421 | 28,719,489 | -22% | 18 |
| Penelec Total | 179,105,091 | 174,851,705 | | |

General Note: Capital reported on Generally Accepted Accounting Principles (GAAP) basis.

| Penn Power T&D Capital – 2018 (\$) | | | | |
|---------------------------------------|-------------------|-------------------|------------|-------|
| Category | 2018 Actuals | 2018 Budget | Variance % | Notes |
| Capacity | 2,189,386 | 100,359 | 2082% | 19 |
| Condition | 794,650 | 1,412,444 | -44% | 20 |
| Facilities | 371,909 | 122 | 303996% | 21 |
| Forced | 13,525,119 | 17,722,956 | -24% | 22 |
| Meter Related | 661,500 | 540,010 | 22% | 23 |
| New Business | 5,500,696 | 5,666,730 | -3% | |
| Other | 4,289,201 | 222,601 | 1827% | 24 |
| Reliability | 17,929,287 | 14,271,585 | 26% | 19 |
| Street Light | 397,652 | 561,281 | -29% | 25 |
| Tools & Equip | 759,711 | 37,747 | 1913% | 26 |
| Vegetation Mgt. | 1,951,542 | 5,326,085 | -63% | 27 |
| Penn Power Total | 48,370,655 | 45,861,921 | | |

General Note: Capital reported on Generally Accepted Accounting Principles (GAAP) basis.

| West Penn T&D Capital – 2018 (\$) | | | | |
|--------------------------------------|--------------------|--------------------|------------|-------|
| Category | 2018 Actuals | 2018 Budget | Variance % | Notes |
| Capacity | 7,954,084 | 2,597,013 | 206% | 28 |
| Condition | 12,446,751 | 18,476,672 | -33% | 29 |
| Facilities | 7,768,058 | 3,635,875 | 114% | 30 |
| Forced | 47,728,751 | 37,132,224 | 29% | 3 |
| Meter Related | 1,830,098 | 2,436,480 | -25% | 4 |
| New Business | 16,531,724 | 22,623,356 | -27% | 14 |
| Other | 84,278,859 | 71,890,920 | 17% | 31 |
| Reliability | 56,528,037 | 40,754,399 | 39% | 32 |
| Street Light | 4,233,056 | 6,245,554 | -32% | 7 |
| Tools & Equip | 2,234,810 | 3,244,253 | -31% | 33 |
| Vegetation Mgt. | 32,393,258 | 41,088,498 | -21% | 27 |
| West Penn Total | 273,927,483 | 250,125,244 | | |

General Note: Capital reported on Generally Accepted Accounting Principles (GAAP) basis.

| Variance Explanations (Variances 10% or greater) | |
|--|---|
| 1 | Under budget due to delays in construction and work scope changes for new modular substation locations. |
| 2 | Over budget due to contractor and material spend for facility repairs at numerous locations being greater than planned. |
| 3 | Over budget due to higher capitalized storm expenditures. |
| 4 | Under budget due to meter exchanges being lower than planned. |
| 5 | Over budget due to contractor and material spend being greater than planned. |
| 6 | Under budget due to capital spend and delays in remote terminal unit project being less than planned. |
| 7 | Under budget due to LED streetlight replacements being lower than planned. |
| 8 | Under budget due to timing of computer hardware purchases. |
| 9 | Under budget due to contractor spend being lower than planned. |
| 10 | Under budget due to timing differences in several construction projects and adjustment to capital related payroll overhead. |
| 11 | Under budget due to timing differences in several construction projects. |
| 12 | Over budget due to timing differences in several construction projects. |
| 13 | Under budget due to new commercial and residential business being lower than planned. |
| 14 | Over budget due to accounting adjustment impacting the categories only, but not impacting the totals overall. |
| 15 | Under budget due to timing differences in several construction projects. |
| 16 | Under budget due to unscheduled distribution streetlighting repair being lower than planned. |
| 17 | Over budget due to regional and corporate small tools purchases and fleet projects being greater than planned. |
| 18 | Under budget due to planned distribution vegetation management being lower than planned. |
| 19 | Over budget due to construction projects related expense being greater than planned. |
| 20 | Under budget due to unscheduled equipment repairs and replacements being lower than planned. |
| 21 | Over budget due to paving costs being greater than planned. |
| 22 | Under budget due to construction project replacement costs being lower than planned. |
| 23 | Over budget due to volume of meter exchanges being greater than planned. |
| 24 | Over budget due to pension costs being higher than planned and overhead credits being lower than planned. |
| 25 | Under budget due to lighting replacement related work being lower than planned. |
| 26 | Over budget due to vehicle related and small tool expenses being greater than planned. |

| Variance Explanations (Variances 10% or greater) | |
|--|---|
| 27 | Under budget due to distribution vegetation management spend being lower than planned. |
| 28 | Over budget due capacity projects for Dale Summit 230kV Install 230 kV Line Breaker and Keisters-Campbell Convert 69 to 138kV being greater than planned. |
| 29 | Under budget due to construction projects and planned unscheduled repair of overhead and underground facilities being lower than planned. |
| 30 | Over budget due to additional facilities work at the Connellsville, Waynesboro and Greensburg. |
| 31 | Over budget due to Cranberry-Wylie Ridge 500kV line repairs being greater than planned. |
| 32 | Over budget due to NERC alert mitigation transmission project, construction projects and Greensburg security upgrades being greater than planned. |
| 33 | Under budget due to tools, mobile data terminal and vehicle purchases being lower than planned. |

Section 57.195(b)(9) *Quantified transmission and distribution inspection and maintenance goals/objectives for the current calendar year detailed by system area (that is, transmission, substation and distribution).*

T&D Inspection & Maintenance Programs – 2019 Goals / Objectives

| T&D Inspection & Maintenance Programs - 2019 | | | | |
|---|---------------|----------------|---|--|
| Program/Project | Met-Ed | Penelec | Penn Power | West Penn |
| Forestry | | | | |
| Transmission (Miles) | 282.22 | 384.77 | 171.19 | 208.34 |
| Distribution (Miles) | 2,845 | 3,953 | 1,141 | 4,480 |
| Transmission | | | | |
| Aerial Patrols | 2 | 2 | 2 | 2 |
| Groundline (Poles) | 890 | 981 | 122 | 1,547 |
| Substation | | | | |
| Substation Inspections Class A | 422 | 788 | 148 | 714 |
| Substation Inspections Class B | 422 | 788 | 148 | 714 |
| Substation Inspections Class C | 1,688 | 3,152 | 592 | 2,856 |
| Transformers | 395 | 696 | 125 | 688 |
| Breakers | 87 | 437 | 8 | 379 |
| Relay Schemes | 114 | 146 | 18 | 185 |
| Distribution | | | | |
| Capacitors | 4,761 | 8,702 | 978 | 1,305 |
| Poles | 28,000 | 41,584 | 10,600 | 45,074 |
| Reclosers | 1,115 | 2,581 | 863 | 3,911 |
| Radio-Controlled Switches (2 / year) | 760 | 2,706 | Penn Power has no radio-controlled switches | West Penn has no radio-controlled switches |

Section 57.195(b)(10) Budgeted transmission and distribution operation and maintenance expenses for the current year in total and detailed by the EDC's own functional account code or FERC account code as available.

2019 T&D O&M Budget²⁴

| Met-Ed T&D O&M - Annual 2019 (\$) | | |
|--------------------------------------|---|-------------------|
| Transmission | | |
| Category | | Annual Budget |
| 560 | Operation Supervision & Engineering | 0 |
| 561 | Load Dispatching | (150,250) |
| 563 | Overhead Line Expenses | 56,800 |
| 565 | Transmission of Electricity by Others | 8,436,000 |
| 566 | Miscellaneous Transmission Expenses | (18,298) |
| 567 | Rents | 0 |
| 568 | Maintenance Supervision and Engineering | 0 |
| 569 | Maintenance of Structures | 29,209 |
| 570 | Maintenance of Station Equipment | 4,500 |
| 571 | Maintenance of Overhead Lines | 0 |
| 573 | Maintenance of Miscellaneous Transmission Plant | (4,790) |
| 575 | Market Administration, Monitoring & Compliance Services | 0 |
| Transmission Total | | 8,353,172 |
| Distribution | | |
| Category | | Annual Budget |
| 580 | Operation Supervision & Engineering | 228,234 |
| 581 | Load Dispatching | 231,996 |
| 582 | Station Expenses | 912,328 |
| 583 | Overhead Line Expenses | 122,451 |
| 584 | Underground Line Expenses | 0 |
| 586 | Meter Expenses | 640,356 |
| 588 | Miscellaneous Distribution Expenses | 6,404,140 |
| 589 | Rents | 523,469 |
| 590 | Maintenance Supervision and Engineering | 426,857 |
| 591 | Maintenance of Structures | 2,790 |
| 592 | Maintenance of Station Equipment | 7,292,017 |
| 593 | Maintenance of Overhead Lines | 34,016,659 |
| 594 | Maintenance of Underground Lines | 2,229,571 |
| 595 | Maintenance of Line Transformers | 1,126,594 |
| 596 | Maintenance of Street Lighting and Signal Systems | 400,145 |
| 597 | Maintenance of Meters | 2,348,044 |
| 598 | Maintenance of Miscellaneous Distribution Plant | 2,381,957 |
| Distribution Total | | 59,287,607 |
| Met-Ed Total | | 67,640,780 |

²⁴ Budgets are subject to change.

| Penelec T&D O&M - Annual 2019 (\$) | | |
|---------------------------------------|---|-------------------|
| Transmission | | |
| Category | | Annual Budget |
| 560 | Operation Supervision & Engineering | 0 |
| 561 | Load Dispatching | (224,895) |
| 562 | Station Expenses | 157,082 |
| 563 | Overhead Line Expenses | 531,051 |
| 565 | Transmission of Electricity by Others | 27,622,716 |
| 566 | Miscellaneous Transmission Expenses | 0 |
| 567 | Rents | 275,000 |
| 568 | Maintenance Supervision and Engineering | 0 |
| 569 | Maintenance of Structures | 31,485 |
| 570 | Maintenance of Station Equipment | 288,560 |
| 571 | Maintenance of Overhead Lines | 0 |
| 573 | Maintenance of Miscellaneous Transmission Plant | 0 |
| 575 | Market Administration, Monitoring & Compliance Services | 0 |
| Transmission Total | | 28,681,000 |
| Distribution | | |
| Category | | Annual Budget |
| 580 | Operation Supervision & Engineering | 325,625 |
| 581 | Load Dispatching | 311,134 |
| 583 | Overhead Line Expenses | 91,827 |
| 584 | Underground Line Expenses | 970,299 |
| 586 | Meter Expenses | 778,690 |
| 588 | Miscellaneous Distribution Expenses | 10,818,822 |
| 589 | Rents | 1,227,405 |
| 590 | Maintenance Supervision and Engineering | 457,831 |
| 592 | Maintenance of Station Equipment | 5,911,064 |
| 593 | Maintenance of Overhead Lines | 35,394,672 |
| 594 | Maintenance of Underground Lines | 146,475 |
| 595 | Maintenance of Line Transformers | 241,662 |
| 596 | Maintenance of Street Lighting and Signal Systems | 2,912,376 |
| 597 | Maintenance of Meters | 4,200,560 |
| 598 | Maintenance of Miscellaneous Distribution Plant | 32,545 |
| Distribution Total | | 63,820,986 |
| Penelec Total | | 92,501,987 |

| Penn Power T&D O&M - Annual 2019 (\$) | | |
|--|---|-------------------|
| Transmission | | |
| Category | | Annual Budget |
| 560 | Operation Supervision & Engineering | 1,325 |
| 561 | Load Dispatching | 125,907 |
| 562 | Station Expenses | (347) |
| 563 | Overhead Line Expenses | (603) |
| 565 | Transmission of Electricity by Others | 4,148,892 |
| 566 | Miscellaneous Transmission Expenses | 4,216 |
| 568 | Maintenance Supervision and Engineering | 13,054 |
| 569 | Maintenance of Structures | 9,575 |
| 570 | Maintenance of Station Equipment | 3,047 |
| 571 | Maintenance of Overhead Lines | 89,459 |
| 573 | Maintenance of Miscellaneous Transmission Plant | 0 |
| 575 | Market Administration, Monitoring & Compliance Services | 0 |
| Transmission Total | | 4,394,526 |
| Distribution | | |
| Category | | Annual Budget |
| 580 | Operation Supervision & Engineering | 0 |
| 582 | Station Expenses | 0 |
| 584 | Underground Line Expenses | 526,031 |
| 586 | Meter Expenses | 82,500 |
| 588 | Miscellaneous Distribution Expenses | 782,612 |
| 589 | Rents | 330,437 |
| 590 | Maintenance Supervision and Engineering | 114,777 |
| 592 | Maintenance of Station Equipment | 308,743 |
| 593 | Maintenance of Overhead Lines | 13,683,588 |
| 594 | Maintenance of Underground Lines | 49,513 |
| 595 | Maintenance of Line Transformers | 50,939 |
| 596 | Maintenance of Street Lighting and Signal Systems | 20,957 |
| 597 | Maintenance of Meters | 520,239 |
| 598 | Maintenance of Miscellaneous Distribution Plant | 56,497 |
| Distribution Total | | 16,526,833 |
| Penn Power Total | | 20,921,358 |

| West Penn T&D O&M - Annual 2019 (\$) | | |
|---|---|--------------------|
| Transmission | | |
| Category | | Annual Budget |
| 560 | Operation Supervision & Engineering | 47,984 |
| 561 | Load Dispatching | 987,631 |
| 562 | Station Expenses | 119,757 |
| 563 | Overhead Line Expenses | 22,127 |
| 565 | Transmission of Electricity by Others | 61,139,736 |
| 566 | Miscellaneous Transmission Expenses | 388,389 |
| 567 | Rents | 23,960 |
| 568 | Maintenance Supervision and Engineering | 617,028 |
| 569 | Maintenance of Structures | 34,899 |
| 570 | Maintenance of Station Equipment | 1,976,768 |
| 571 | Maintenance of Overhead Lines | 8,948,508 |
| 573 | Maintenance of Miscellaneous Transmission Plant | 0 |
| 575 | Market Administration, Monitoring & Compliance Services | 0 |
| Transmission Total | | 74,306,787 |
| Distribution | | |
| Category | | Annual Budget |
| 580 | Operation Supervision & Engineering | 40,721 |
| 581 | Load Dispatching | 2,032,520 |
| 582 | Station Expenses | 1,063,203 |
| 583 | Overhead Line Expenses | 1,001,275 |
| 584 | Underground Line Expenses | 1,300,000 |
| 586 | Meter Expenses | 1,699,416 |
| 588 | Miscellaneous Distribution Expenses | 15,053,815 |
| 589 | Rents | 0 |
| 590 | Maintenance Supervision and Engineering | 775,543 |
| 591 | Maintenance of Structures | 0 |
| 592 | Maintenance of Station Equipment | 8,738,340 |
| 593 | Maintenance of Overhead Lines | 35,705,974 |
| 594 | Maintenance of Underground Lines | 1,105,759 |
| 595 | Maintenance of Line Transformers | 303,198 |
| 596 | Maintenance of Street Lighting and Signal Systems | 663,079 |
| 597 | Maintenance of Meters | 1,336,071 |
| 598 | Maintenance of Miscellaneous Distribution Plant | 174,905 |
| Distribution Total | | 70,993,818 |
| West Penn Total | | 145,300,605 |

Section 57.195(b)(11) Budgeted transmission and distribution capital expenses for the current year in total and detailed by the EDC's own functional account code or FERC account code as available.

2019 T&D Capital Budget²⁵

| Met-Ed T&D Capital - Annual 2019 (\$) | |
|--|----------------------|
| Category | Annual Budget |
| Capacity | 18,816,849 |
| Condition | 20,865,773 |
| Facilities | 401,995 |
| Forced | 47,374,775 |
| Meter Related | 3,184,048 |
| New Business | 17,430,231 |
| Other | 18,497,289 |
| Reliability | 35,689,750 |
| Street Light | 1,355,698 |
| Tools & Equip | 1,367,255 |
| Vegetation Management | 11,676,319 |
| Met-Ed Total | 176,659,981 |

| Penelec T&D Capital - Annual 2019 (\$) | |
|---|----------------------|
| Category | Annual Budget |
| Capacity | 9,232 |
| Condition | 8,025,004 |
| Facilities | 612,343 |
| Forced | 41,673,023 |
| Meter Related | 1,199,288 |
| New Business | 12,077,113 |
| Other | 28,512,226 |
| Reliability | 24,395,291 |
| Street Light | 4,152,570 |
| Tools & Equip | 4,733,828 |
| Vegetation Management | 21,136,461 |
| Penelec Total | 146,526,379 |

²⁵ Budgets are subject to change and are reported on a Generally Accepted Accounting Principles (GAAP) basis.

| Penn Power T&D Capital - Annual 2019 (\$) | |
|--|----------------------|
| Category | Annual Budget |
| Capacity | 233,499 |
| Condition | 5,028,802 |
| Facilities | 23,425 |
| Forced | 6,794,376 |
| Meter Related | 656,288 |
| New Business | 5,984,260 |
| Other | (3,181,698) |
| Reliability | 29,697,638 |
| Street Light | 570,580 |
| Tools & Equip | 161,646 |
| Vegetation Management | 2,971,030 |
| Penn Power Total | 48,939,848 |

| West Penn T&D Capital - Annual 2019 (\$) | |
|---|----------------------|
| Category | Annual Budget |
| Capacity | (2,769,181) |
| Condition | 21,879,413 |
| Facilities | 352,465 |
| Forced | 48,992,024 |
| Meter Related | 1,510,550 |
| New Business | 28,682,457 |
| Other | 44,082,329 |
| Reliability | 59,905,144 |
| Street Light | 1,839,136 |
| Tools & Equip | 2,981,970 |
| Vegetation Management | 26,926,912 |
| West Penn Total | 234,383,219 |

Submitted Pursuant to 52 Pa. Code § 57.195(a) and (b)

Section 57.195(b)(12) Significant changes, if any, to the transmission and distribution maintenance programs previously submitted to the Commission.

Changes to T&D Maintenance Programs

In 2018, the Companies made no significant revisions to their Inspection and Maintenance practices.

ATTACHMENT A

Worst Performing Circuits – Remedial Actions

| Met-Ed | | | | |
|---------------------------------|----------------------|--|-------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work | Progress of Remedial Work or Date Completed |
| Mountain | 00744-4 | <i>Performance was driven by trees off ROW (84%).</i> | | |
| | | Perform targeted three phase circuit assessment | Complete | Mar-18 |
| | | Perform targeted three phase circuit assessment | Complete | Apr-18 |
| | | Install Supervisory Control and Data Acquisition (SCADA) switch | Complete | Apr-18 |
| | | On cycle tree trimming | Complete | Jun-18 |
| | | Enhanced tree trimming | Complete | Jun-18 |
| | | Upgrade Zone 2 recloser to emergency management system radio controlled | To be Completed 2019 | 0% |
| Lickdale | 00625-2 | <i>Performance was driven by trees off ROW (62%) and equipment failure (11%).</i> | | |
| | | Thermovision and overhead inspection | Complete | Apr-18 |
| | | Enhanced tree trimming | Complete | Jun-18 |
| | | Post-storm circuit patrol | Complete | Aug-18 |
| | | On cycle tree trimming | Complete | Dec-18 |
| | | Install SCADA device #1 | To be Completed 2019 | 0% |
| | | Install SCADA device #2 | To be Completed 2019 | 0% |
| | | Repair/replace high priority items identified during inspection | To be Completed 2019 | 0% |
| | | Repair/replace high priority items identified during inspection | To be Completed 2019 | 0% |
| Three-phase overhead inspection | To be Completed 2019 | 0% | | |
| Shawnee | 00899-3 | <i>Performance was driven by trees off ROW (34%), equipment failure (27%) and unknown outages (23%).</i> | | |
| | | Repair items identified during Thermovision inspection | Complete | Feb-18 |
| | | Install SCADA switch #1 | Complete | Nov-18 |
| | | Install SCADA switch #2 | Complete | Nov-18 |
| | | Install SCADA switch #3 | Complete | Nov-18 |

| Met-Ed | | | | |
|---------------------------------|----------------------|---|-------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work | Progress of Remedial Work or Date Completed |
| S. Nazareth | 00809-3 | <i>Performance was driven by equipment failure (54%), forced outages (16%) and vehicle accidents (15%).</i> | | |
| | | Thermovision and overhead inspection | Complete | Jan-18 |
| | | Repair items identified during Thermovision inspection | Complete | Mar-18 |
| | | Install SCADA switch | Complete | Nov-18 |
| | | Three-phase overhead inspection | To be Completed 2019 | 0% |
| | | Install SCADA recloser #1 | To be Completed 2019 | 0% |
| | | Install SCADA recloser #2 | To be Completed 2019 | 0% |
| | | Install SCADA recloser #3 | To be Completed 2019 | 0% |
| | | Install SCADA recloser #4 | To be Completed 2019 | 0% |
| Lickdale | 00626-2 | <i>Performance was driven by equipment failure (68%).</i> | | |
| | | Thermovision and overhead inspection | Complete | Apr-18 |
| | | On cycle tree trimming | Complete | Dec-18 |
| | | Targeted mainline rehabilitation | Complete | Sep-18 |
| | | Install SCADA switch #1 | To be Completed 2019 | 0% |
| | | Install SCADA switch #2 | To be Completed 2019 | 0% |
| | | Install SCADA switch #3 | To be Completed 2019 | 0% |
| | | Install SCADA recloser #1 | To be Completed 2019 | 0% |
| | | Repair/replace high priority items identified during inspection | To be Completed 2019 | 0% |
| Three-phase overhead inspection | To be Completed 2019 | 0% | | |

| Met-Ed | | | | |
|---------------------------------|----------------------|--|-------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work | Progress of Remedial Work or Date Completed |
| Bernville | 00786-1 | <i>Performance was driven by outages caused by trees off ROW (52%) and line and equipment failure (25%).</i> | | |
| | | Thermovision and overhead inspection | Complete | Mar-18 |
| | | Enhanced overhead circuit inspection | Complete | Mar-18 |
| | | Post-storm forestry inspection | Complete | Mar-18 |
| | | Replace arrester on mainline switch from inspection | Complete | Oct-18 |
| | | Replace porcelain cutout with polymer cutout from inspection | Complete | Oct-18 |
| | | Replace pole from inspection #1 | Complete | Oct-18 |
| | | Replace crossarm from inspection #1 | Complete | Nov-18 |
| | | Replace pole from inspection #2 | Complete | Nov-18 |
| | | Replace pole from inspection #3 | Complete | Nov-18 |
| | | Replace crossarm from inspection #2 | Complete | Dec-18 |
| | | Replace pole from inspection #4 | Complete | Dec-18 |
| | | Replace crossarm from inspection #3 | Complete | Dec-18 |
| | | Install SCADA switch #1 | Complete | Dec-18 |
| | | Install SCADA switch #2 | Complete | Dec-18 |
| | | Targeted mainline circuit rehabilitation engineering review | To be Completed 2019 | 0% |
| | | Replace line clamp from Thermovision inspection | To be Completed 2019 | 25% |
| | | Replace crossarm brace from Thermovision inspection | To be Completed 2019 | 25% |
| | | Replace crossarm brace from Thermovision inspection | To be Completed 2019 | 25% |
| | | Replace crossarm brace from Thermovision inspection | To be Completed 2019 | 25% |
| | | Install SCADA recloser | To be Completed 2019 | 50% |
| | | Install SCADA switch #1 | To be Completed 2019 | 50% |
| Install SCADA switch #2 | To be Completed 2019 | 25% | | |
| Three-phase overhead inspection | To be Completed 2019 | 0% | | |

| Met-Ed | | | | |
|-----------------------------|----------------------|--|-------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work | Progress of Remedial Work or Date Completed |
| Shawnee | 00822-3 | <i>Performance was driven by vehicle accidents (47%), equipment failure (15%) and unknown outages (13%).</i> | | |
| | | Repair items identified during Thermovision inspection | Complete | Feb-18 |
| | | Porcelain cutout replacement #1 | Complete | Dec-18 |
| | | Porcelain cutout replacement #2 | Complete | Dec-18 |
| | | Porcelain cutout replacement #3 | Complete | Dec-18 |
| | | Install SCADA switch | To be Completed 2019 | 0% |
| | | Three-phase overhead inspection | To be Completed 2019 | 0% |
| Birchwood | 00624-3 | <i>Performance was driven by vehicle accidents (73%) and equipment failure (23%).</i> | | |
| | | Thermovision and overhead inspection | Complete | Feb-18 |
| | | Enhanced tree trimming | Complete | Aug-18 |
| | | Install SCADA recloser | Complete | Dec-18 |
| | | Install SCADA recloser | To be Completed 2019 | 0% |
| Overhead circuit inspection | To be Completed 2019 | 0% | | |

| Penelec | | | | |
|--------------|----------|--|-----------------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work Completed | Progress of Remedial Work or Date Completed |
| Grover | 00527-63 | <i>Performance was driven by trees off ROW (83%).</i> | | |
| | | Repair line failure | Complete | May-18 |
| | | Repair damage caused by trees during a storm | Complete | May-18 |
| | | Repair damage caused by trees during a storm | Complete | Sep-18 |
| Warren South | 00220-41 | <i>Performance was driven by trees off ROW (82%).</i> | | |
| | | Repair damage caused by trees | Complete | Feb-18 |
| | | Repair equipment failure | Complete | May-18 |
| | | Repair damage caused by trees during a storm | Complete | Jul-18 |
| | | Porcelain cutout replacement | Complete | Jul-18 |
| | | Repair damage caused by trees during a storm | Complete | Sep-18 |
| | | Install advanced distribution protective devices | Complete | Dec-18 |
| | | On cycle tree trimming | To be Completed 2019 | 0% |
| Madera | 00166-22 | <i>Performance was driven by recloser operation of an unknown cause (26%), equipment failure (25%), trees off ROW (22%) and vehicle (21%).</i> | | |
| | | Porcelain cutout replacement | Complete | Feb-18 |
| | | Repair damage caused by vehicle accident | Complete | Mar-18 |
| | | Repair damage caused by trees during a storm | Complete | May-18 |
| | | Restore recloser operation of unknown cause | Complete | Sep-18 |
| | | Restore recloser operation of unknown cause | Complete | Sep-18 |
| | | Repair equipment failure | Complete | Nov-18 |
| Timblin | 00103-23 | <i>Performance was driven by trees off ROW (87%).</i> | | |
| | | Repair equipment failure | Complete | Feb-18 |
| | | Circuit inspection | Complete | Oct-18 |
| | | Repair damage caused by trees during a storm | Complete | Nov-18 |
| | | Targeted circuit rehabilitation | To be Completed 2019 | 0% |
| | | On cycle tree trimming | To be Completed 2019 | 0% |
| Lake Como | 00787-65 | <i>Performance was driven by line failure (77%) and trees off ROW (14%).</i> | | |
| | | Repair line failure | Complete | Feb-18 |
| | | Repair damage caused by trees during a storm | Complete | Jun-18 |
| | | Repair line failure | Complete | Jul-18 |

| Penelec | | | | |
|--|----------------------|--|-----------------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work Completed | Progress of Remedial Work or Date Completed |
| Union City | 00207-43 | <i>Performance was driven by line failure (54%), vehicle accident (22%) and trees off ROW (11%).</i> | | |
| | | Repair line failure | Complete | Jan-18 |
| | | Repair line failure | Complete | Mar-18 |
| | | Repair damage caused by vehicle accident | Complete | Mar-18 |
| | | Repair damage caused by trees during a storm | Complete | Nov-18 |
| Logan | 00700-81 | <i>Performance was driven by trees off ROW (60%) and vehicle accident (32%).</i> | | |
| | | Porcelain cutout replacement | Complete | Apr-18 |
| | | Repair damage caused by trees | Complete | Jun-18 |
| | | Repair damage caused by trees | Complete | Sep-18 |
| | | Repair damage caused by vehicle accident | Complete | Oct-18 |
| Tunkhannock | 00533-65 | <i>Performance was driven by trees off ROW (74%) and equipment failure (16%).</i> | | |
| | | Repair damage caused by trees during a storm | Complete | May-18 |
| | | Repair damage caused by trees during a storm | Complete | Jul-18 |
| | | Repair equipment failure | Complete | Jul-18 |
| Springboro | 00237-52 | <i>Performance was driven by trees off ROW (67%) and vehicle accident (14%).</i> | | |
| | | Repair damage caused by trees | Complete | Mar-18 |
| | | Repair damage caused by vehicle accident | Complete | Apr-18 |
| | | Repair damage caused by trees | Complete | Apr-18 |
| | | Targeted circuit rehabilitation | To be Completed 2019 | 0% |
| Thompson | 00436-65 | <i>Performance was driven by trees off ROW (82%).</i> | | |
| | | Repair damage caused by trees during a storm | Complete | Aug-18 |
| | | Repair damage caused by trees | Complete | Oct-18 |
| Union City | 00206-43 | <i>Performance was driven by equipment failure (61%) and trees off ROW (14%).</i> | | |
| | | Repair equipment failure | Complete | Feb-18 |
| | | Repair equipment failure | Complete | May-18 |
| | | Replace substation breaker | Complete | Jul-18 |
| | | Repair equipment failure | Complete | Sep-18 |
| | | Install new radio-controlled switch | To be Completed 2019 | 0% |
| | | Targeted circuit rehabilitation | To be Completed 2019 | 0% |
| Install advanced distribution protective devices | To be Completed 2019 | 0% | | |

| Penelec | | | | |
|---------------------|----------|---|-----------------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work Completed | Progress of Remedial Work or Date Completed |
| N Meshoppen Tran | 00534-65 | <i>Performance was driven by trees off ROW (61%) and equipment failure (29%).</i> | | |
| | | Install radio fault indicators | Complete | Jan-18 |
| | | Repair equipment failure | Complete | Feb-18 |
| | | Repair damage caused by trees during a storm | Complete | May-18 |
| | | Circuit inspection | Complete | Jul-18 |
| | | Repair damage caused by trees | Complete | Jul-18 |
| | | Repair damage caused by trees during a storm | Complete | Nov-18 |
| Birmingham | 00168-22 | <i>Performance was driven by vehicle accident (63%), trees off ROW (16%) and fuse operation of unknown cause (12%).</i> | | |
| | | Repair damage caused by vehicle accident | Complete | Mar-18 |
| | | Restore fuse operation of unknown cause | Complete | Jul-18 |
| | | Repair damage caused by vehicle accident | Complete | Oct-18 |
| | | Repair damage caused by trees | Complete | Dec-18 |
| Philipsburg | 00162-22 | <i>Performance was driven by equipment failure (43%), vehicle accident (23%) and trees off ROW (15%).</i> | | |
| | | Repair equipment failure | Complete | Jan-18 |
| | | Repair equipment failure | Complete | May-18 |
| | | Targeted circuit rehabilitation | Complete | May-18 |
| | | Repair damage caused by vehicle accident | Complete | Aug-18 |
| | | Install advanced distribution protective devices | Complete | Dec-18 |
| | | Targeted circuit rehabilitation | To be Completed 2019 | 0% |
| | | Split large circuits | To be Completed 2019 | 0% |
| Logan | 00701-81 | <i>Performance was driven by equipment failure (48%) and lightning (33%).</i> | | |
| | | Repair equipment failure | Complete | May-18 |
| | | Repair damage caused by trees during a storm | Complete | May-18 |
| | | Repair damage caused by lightning | Complete | Sep-18 |
| | | Repair equipment failure | Complete | Nov-18 |

| Penelec | | | | |
|--------------|----------|--|-----------------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work Completed | Progress of Remedial Work or Date Completed |
| East Hickory | 00201-41 | <i>Performance was driven by trees off ROW (94%).</i> | | |
| | | Repair damage caused by trees | Complete | May-18 |
| | | Repair damage caused by trees during a storm | Complete | Jul-18 |
| | | Repair damage caused by trees | Complete | Sep-18 |
| | | Repair damage caused by trees | Complete | Dec-18 |
| | | Replace substation recloser | Complete | Dec-18 |
| | | On cycle tree trimming | To be Completed 2019 | 0% |
| Brookville | 00125-23 | <i>Performance was driven by trees off ROW (65%) and vehicle accident (26%).</i> | | |
| | | Repair damage caused by vehicle accident | Complete | Apr-18 |
| | | Repair damage caused by trees during a storm | Complete | Sep-18 |
| | | Replace cap & pin insulators | Complete | Sep-18 |
| | | Circuit inspection | Complete | Oct-18 |
| | | On cycle tree trimming | To be Completed 2019 | 0% |

| Penn Power | | | | |
|-------------------|----------------|--|--------------------------------|--|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work | Progress of Remedial Work or Date Completed |
| Hickory | W-243 | <i>Performance was driven by trees off ROW (91%).</i> | | |
| | | Restore breaker operation caused by line fault/trees during storm | Complete | Mar-18 |
| | | Repair damage caused by tree | Complete | Aug-18 |
| Canal | W-101 | <i>Performance was driven by trees off ROW (52%), equipment failure (25%) and unknown (19%).</i> | | |
| | | Repair damage caused by trees during a storm | Complete | Jan-18 |
| | | Repair damage caused by trees during a storm | Complete | Mar-18 |
| | | Replace broken insulators | Complete | Jul-18 |
| | | Restore breaker operation of unknown cause | Complete | Aug-18 |

| West Penn | | | | |
|------------|--------------|---|-----------------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work Completed | Progress of Remedial Work or Date Completed |
| Rutan | Bristoria | <i>Performance driven by trees off ROW (61%) and equipment failure (24%).</i> | | |
| | | Repair damage caused by a tree during a storm | Complete | Feb-18 |
| | | Repair damage caused by a tree during a storm | Complete | Feb-18 |
| | | Repair equipment failure during a storm | Complete | Feb-18 |
| | | Repair damage caused by a tree during a storm | Complete | Apr-18 |
| | | Repair damage caused by a tree during a storm | Complete | Apr-18 |
| | | Repair equipment failure during a storm | Complete | Jul-18 |
| | | Repair damage caused by a tree during a storm | Complete | Aug-18 |
| | | Repair equipment failure | Complete | Oct-18 |
| | | Repair damage caused by a tree during a storm | Complete | Oct-18 |
| | | Overhead circuit inspection | To be Completed 2019 | 0% |
| Smith | Francis Mine | <i>Performance driven by trees off ROW (78%) and unknown (16%).</i> | | |
| | | Repair damage caused by a tree during a storm | Complete | Jan-18 |
| | | Repair damage caused by a tree | Complete | May-18 |
| | | Repair damage caused by a tree during a storm | Complete | Jul-18 |
| | | Restore unknown outage during a storm | Complete | Aug-18 |
| | | Reliability job to install fuses | Complete | Aug-18 |
| | | Repair damage caused by a tree | Complete | Sep-18 |
| | | Repair damage caused by a tree during a storm | Complete | Dec-18 |
| Dutch Fork | Claysville | <i>Performance driven by trees off ROW (62%) and unknown (12%).</i> | | |
| | | Repair damage caused by a tree | Complete | Jan-18 |
| | | Forced outage to repair damage | Complete | Feb-18 |
| | | Repair damage caused by a tree during a storm | Complete | Feb-18 |
| | | Forced outage to repair damage during a storm | Complete | May-18 |
| | | Repair damage caused by a tree during a storm | Complete | May-18 |
| | | Restore unknown outage during a storm | Complete | Jun-18 |
| | | Restore unknown outage | Complete | Aug-18 |
| | | Repair damage caused by a tree during a storm | Complete | Sep-18 |
| | | Enhanced WPC remediation | Complete | Nov-18 |
| | | Repair damage caused by a tree | Complete | Dec-18 |

| West Penn | | | | |
|------------|-------------|--|-----------------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work Completed | Progress of Remedial Work or Date Completed |
| Waterville | Waterville | <i>Performance driven by trees off ROW (68%) and other electric utility (28%).</i> | | |
| | | Repair damage caused by a tree during a storm | Complete | Jan-18 |
| | | Restore outage caused by other electric utility | Complete | Apr-18 |
| | | Repair damage caused by a tree during a storm | Complete | Apr-18 |
| | | Zone 2 fuse installation | Complete | May-18 |
| | | Repair damage caused by a tree during a storm | Complete | Aug-18 |
| | | Repair damage caused by a tree | Complete | Aug-18 |
| | | Restore outage caused by other electric utility | Complete | Dec-18 |
| Smith | Florence | <i>Performance driven by trees off ROW (45%) and line failure (27%).</i> | | |
| | | Repair damage caused by a vehicle | Complete | Jan-18 |
| | | Repair damage caused by a tree | Complete | Feb-18 |
| | | Restore unknown outage | Complete | Feb-18 |
| | | Repair damage caused by a tree during a storm | Complete | Apr-18 |
| | | Repair damage caused by a tree during a storm | Complete | Apr-18 |
| | | Forced outage to repair damage | Complete | Jun-18 |
| | | Repair line failure | Complete | Jul-18 |
| | | Repair equipment failure during a storm | Complete | Sep-18 |
| | | Repair damage caused by a tree during a storm | Complete | Sep-18 |
| | | Repair damage caused by a tree | Complete | Dec-18 |
| | | Enhanced WPC remediation | To be Completed 2019 | 0% |
| Dutch Fork | W Alexander | <i>Performance driven by trees off ROW (70%) and line failure (12%).</i> | | |
| | | Repair line failure during a storm | Complete | Jan-18 |
| | | Repair damage caused by a tree during a storm | Complete | Feb-18 |
| | | Repair damage caused by a tree | Complete | Apr-18 |
| | | Restore unknown outage | Complete | May-18 |
| | | Repair damage caused by a tree | Complete | Jun-18 |
| | | Repair damage caused by a tree | Complete | Jul-18 |
| | | Repair line failure during a storm | Complete | Sep-18 |
| | | Repair damage caused by a tree | Complete | Oct-18 |
| | | On cycle tree trimming | To be Completed 2019 | 96% |

| West Penn | | | | |
|--------------|-----------------|--|-----------------------------------|---|
| Substation | Circuit | Remedial Action Planned or Taken | Status of Remedial Work Completed | Progress of Remedial Work or Date Completed |
| Franklin | West Waynesburg | <i>Performance driven by vehicle (50%) and trees off ROW (30%).</i> | | |
| | | Forced outage to repair damage | Complete | Jan-18 |
| | | Repair damage caused by a vehicle | Complete | Jan-18 |
| | | Repair damage caused by a tree | Complete | May-18 |
| | | Repair damage caused by a tree during a storm | Complete | May-18 |
| | | Repair damage caused by a tree | Complete | Aug-18 |
| | | Forced outage to repair damage | Complete | Sep-18 |
| | | Zone 1 infrared inspection | Complete | Sep-18 |
| | | Restore unknown outage | Complete | Oct-18 |
| Bethlen | Darlington | <i>Performance driven by trees off ROW (61%) and vehicle (18%).</i> | | |
| | | Repair damage caused by a vehicle | Complete | Jan-18 |
| | | Repair damage caused by a tree during a storm | Complete | Apr-18 |
| | | Repair damage caused by a tree | Complete | Aug-18 |
| | | Repair damage caused by a tree during a storm | Complete | Aug-18 |
| | | Forced outage to repair damage | Complete | Sep-18 |
| | | Overhead circuit inspection | Complete | Oct-18 |
| | | Repair line failure | Complete | Nov-18 |
| | | Repair damage caused by a tree | Complete | Nov-18 |
| Kiski Valley | Kittanning Rd | <i>Performance driven by trees off ROW (66%) and line failure (20%).</i> | | |
| | | Repair damage caused by a tree during a storm | Complete | Jan-18 |
| | | Repair line failure | Complete | Mar-18 |
| | | Repair damage caused by a tree during a storm | Complete | Apr-18 |
| | | Forced outage to repair damage | Complete | Jun-18 |
| | | Zone 1 infrared inspection | Complete | Aug-18 |
| | | Repair damage caused by a tree during a storm | Complete | Sep-18 |
| | | Repair line failure | Complete | Dec-18 |

ATTACHMENT B

FirstEnergy's Compliance with Terms of the March 30, 2015 Management Audit Order & Corrective Action Plan

On March 30, 2015, the Commission issued an order directing Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company to prepare and file a revised implementation plan relating to specific topics addressed in the report issued by the Commission's Bureau of Audits on February 12, 2015.²⁶ More specifically, Ordering Paragraphs 3 and 4 refer to reliability and worst performing circuits, respectively.

In a tentative order issued on August 20, 2015 accepting the Implementation Plans, the Companies were ordered to report progress for Ordering Paragraphs 3 and 4 on an annual basis in the Annual Reliability Report filed under 52 Pa. Code § 57.195.²⁷

See Attachment C for the 2018 progress report for Ordering Paragraphs 3 and 4.

²⁶ Implementation Plans for the Focused Management Audit of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company can Docket Nos. D-2013-2365991, D-2013-2365992, D-2013-2365993, D-2013-2365994.

²⁷ Additionally, in the tentative order, it allowed Penn Power and Penelec to consider the Annual Reliability Report as the fourth quarter CAP update. In a letter dated January 6, 2017 from Paul Diskin, Director, Technical Utility Services, Penn Power is no longer required to provide quarterly CAP updates. Please note that the projects identified as plan type "Reliability" in Attachment B also correspond with the Penelec CAP.

Met-Ed Projects 2018

| Project Description | Plan Type | Start Date (Actual/Projected) | Original Projected Completion Date | Updated Projected Completion Date | Actual Completion Date | Percent Complete | Potential SAIFI Reliability Benefit | Potential CAIDI Reliability Benefit | Potential SAIDI Reliability Benefit | Actual Project Cost | Comments |
|--|-----------|----------------------------------|---------------------------------------|--------------------------------------|------------------------|------------------|--|--|--|---------------------|----------|
| 621-3 Create Tie with 620-3 | WPC | January 2018 | December 2018 | | December 4, 2018 | 100% | 0.0010 | | 0.118 | \$ 2,125,858.00 | |
| Targeted Mainline Rehabilitation (5 Circuits) | WPC | January 2018 | December 2018 | | December 19, 2018 | 100% | 0.0004 | | 0.040 | \$ 1,176,643.00 | |
| Porcelain Cutout Replacement (5 Circuits) | WPC | January 2018 | December 2018 | | December 19, 2018 | 100% | 0.0004 | | 0.040 | \$ 1,283,274.00 | |

| Penelec Projects 2018 | | | | | | | | | | | |
|---|-------------|-------------------------------|------------------------------------|-----------------------------------|------------------------|------------------|-------------------------------------|-------------------------------------|-------------------------------------|---------------------|---|
| Transmission Projects (Project Lead: Engineering Project Manager) | | | | | | | | | | | |
| Project Description | Plan Type | Start Date (Actual/Projected) | Original Projected Completion Date | Updated Projected Completion Date | Actual Completion Date | Percent Complete | Potential SAIFI Reliability Benefit | Potential CAIDI Reliability Benefit | Potential SAIDI Reliability Benefit | Actual Project Cost | Comments |
| Transmission Improvement Study - REMOVED | Reliability | January 2018 | December 2018 | | | | | | | | See the response to VII-1 for an explanation for removal of this project. |
| Distribution Lines Projects (Project Lead: Engineering Project Manager) | | | | | | | | | | | |
| Project Description | Plan Type | Start Date (Actual/Projected) | Original Projected Completion Date | Updated Projected Completion Date | Actual Completion Date | Percent Complete | Potential SAIFI Reliability Benefit | Potential CAIDI Reliability Benefit | Potential SAIDI Reliability Benefit | Actual Project Cost | Comments |
| DuBois 00137-23 Line Rehabilitation 20 miles | WPC | June 2017 | December 2017 | November 2018 | November 6, 2018 | 100% | 0.0007 | | 0.08 | \$ 218,600 | |
| Targeted Mainline Rehabilitation of 00226-31 | Reliability | March 2018 | May 2018 | | May 9, 2018 | 100% | 0.0020 | | 0.23 | \$ 567,925 | |
| Targeted Mainline Rehabilitation of 00201-31 | Reliability | October 2018 | December 2018 | | July 16, 2018 | 100% | 0.0022 | | 0.26 | \$ 754,891 | |
| Finish Targeted Mainline Rehabilitation of 00322-32 | Reliability | May 2018 | June 2018 | | February 7, 2018 | 100% | 0.0020 | | 0.23 | \$ 86,556 | |
| Finish protection/coordination work on 00225-31 | Reliability | June 2018 | July 2018 | November 2018 | December 6, 2018 | 100% | 0.0007 | | 0.08 | \$ 110,940 | |
| Finish protection/coordination work on 00586-31 - REMOVED | Reliability | August 2018 | September 2018 | | REMOVED - | 0% | 0.0002 | | 0.02 | | |
| Finish protection/coordination work on 00216-34 | Reliability | May 2018 | August 2018 | | June 15, 2018 | 100% | 0.0002 | | 0.02 | \$ 15,696 | |
| Targeted Mainline Rehabilitation of 00048-11 | Reliability | February 2018 | June 2018 | | July 2018 | 100% | 0.0018 | | 0.21 | \$ 587,161 | |
| Parcelain Outage Replacement (Project Lead: Engineering Project Manager) | | | | | | | | | | | |
| Project Description | Plan Type | Start Date (Actual/Projected) | Original Projected Completion Date | Updated Projected Completion Date | Actual Completion Date | Percent Complete | Potential SAIFI Reliability Benefit | Potential CAIDI Reliability Benefit | Potential SAIDI Reliability Benefit | Actual Project Cost | Comments |
| 34kV B Phase Priority A circuit list cutout replacement (57 circuits) | Reliability | January 2018 | December 2018 | May 2019 | | 99% | 0.0001 | | 0.01 | \$ 2,438,426 | One work request remains on this project. An outage is needed to complete the work and Penelec is communicating with the affected commercial customer to coordinate timing. |
| 12kV and below Substation Isolation SCADA (Project Lead: Engineering Project Manager) | | | | | | | | | | | |
| Project Description | Plan Type | Start Date (Actual/Projected) | Original Projected Completion Date | Updated Projected Completion Date | Actual Completion Date | Percent Complete | Potential SAIFI Reliability Benefit | Potential CAIDI Reliability Benefit | Potential SAIDI Reliability Benefit | Actual Project Cost | Comments |
| Wesley Chapel - Install SCADA - NEW | Reliability | July 2018 | August 2018 | June 2019 | | 80% | 0.0003 | | 0.04 | \$ 88,240 | Switch has been installed in the field and is operating as a manual switch while the communications installation is remaining to be completed. |
| Stoytzen - Install SCADA - NEW | Reliability | August 2018 | September 2018 | June 2019 | | 80% | 0.0003 | | 0.04 | \$ 88,108 | Switch has been installed in the field and is operating as a manual switch while the communications installation is remaining to be completed. |
| Elk Run - Install SCADA - NEW | Reliability | August 2018 | September 2018 | November 2018 | December 19, 2018 | 100% | 0.0003 | | 0.04 | \$ 65,765 | |
| Friedens - Install SCADA - NEW | Reliability | August 2018 | September 2018 | June 2019 | | 80% | 0.0002 | | 0.08 | \$ 108,541 | Switch has been installed in the field and is operating as a manual switch while the communications installation is remaining to be completed. |
| Mine 4Q - Install SCADA | Reliability | October 2018 | November 2018 | June 2019 | | 80% | 0.0003 | | 0.04 | \$ 171,908 | Switch has been installed in the field and is operating as a manual switch while the communications installation is remaining to be completed. |
| Catherine Street - Install SCADA | Reliability | September 2018 | October 2018 | June 2019 | | 25% | 0.0002 | | 0.02 | \$ 143,993 | There was a delay in the substation work related to this project but it was started in February 2019. |
| Sheds Gap - Install SCADA | Reliability | August 2018 | September 2018 | June 2019 | | 90% | 0.0001 | | 0.01 | \$ 187,277 | Deficiencies in the relays in one of the switches was discovered and additional repair is needed. |
| Bethlehem No 31 - Install SCADA | Reliability | March 2018 | Apr 2018 | October 2018 | December 19, 2018 | 100% | 0.0001 | | 0.01 | \$ 8,391 | |
| Loveland - Install SCADA - NEW | Reliability | October 2018 | November 2018 | | December 6, 2018 | 100% | 0.0000 | | 0.00 | \$ 212,185 | |
| Erie South 00259-31 Advanced Protection and Distribution Automation | WPC | September 2017 | December 2018 | | December 6, 2018 | 100% | 0.0041 | | 0.4800 | \$ 150,722 | |
| Warren South 00220-41 Advanced Protection and Distribution Automation | WPC | September 2017 | December 2018 | July 2019 | | 95% | 0.0045 | | 0.5510 | \$ 305,337 | Switch has been installed in the field and is operating as a manual switch while the communications installation is remaining to be completed. |
| Maders 00166-22 - Add Distribution Automation | WPC | September 2017 | December 2018 | | December 31, 2018 | 100% | 0.0035 | | 0.4148 | \$ 247,916 | |
| Union City 00206-43 Advanced Protection and Distribution Automation | WPC | September 2017 | December 2018 | | October 9, 2018 | 100% | 0.0059 | | 0.6970 | \$ 330,700 | |
| Pleasant Valley - Install SCADA | Reliability | August 2019 | October 2019 | | | | 0.0001 | | 0.01 | \$ 88,500 | This project is part of a larger project that has been delayed due to outages on the transmission system. |
| Litton - Install SCADA - REMOVED | Reliability | October 2018 | November 2018 | | REMOVED | | 0.0000 | | 0.00 | | |
| Wells Etc - Install SCADA - REMOVED | Reliability | August 2018 | September 2018 | | REMOVED | | 0.0002 | | 0.03 | | The addition of transmission voltage to the substation from which this circuit is served results in this project not being needed. |

| Buckeye Pipeline - Install SCADA - REMOVED | Reliability | July 2018 | August 2018 | | REMOVED | | 0.0000 | | 0.00 | | Subsequent data analysis performed during the design phase of this project determined a lower reliability benefit than originally calculated. The funds targeted to this project have been reallocated. |
|--|-------------|----------------------------------|---------------------------------------|--------------------------------------|------------------------|------------------|--|--|--|---------------------|---|
| South Townside - Install SCADA - REMOVED | Reliability | August 2018 | September 2018 | | REMOVED | | 0.0003 | | 0.04 | | Project completed in previous years. Replaced with Wesley Chapel. |
| Abex - Install SCADA - REMOVED | Reliability | August 2018 | September 2018 | | REMOVED | | 0.0003 | | 0.04 | | Subsequent data analysis performed during the design phase of this project determined a lower reliability benefit than originally calculated. The funds targeted to this project have been reallocated. |
| Substation (Project Lead: Substation Manager) | | | | | | | | | | | |
| Description | Plan Type | Start Date (Actual/Projected) | Original Projected Completion Date | Updated Projected Completion Date | Actual Completion Date | Percent Complete | Potential SAIFI Reliability Benefit | Potential CAIDI Reliability Benefit | Potential SAIDI Reliability Benefit | Actual Project Cost | Comments |
| Salix 00070-11-add 115kV/23kV at Krain - REMOVED | WPC | September 2017 | December 2018 | | | | 0.0045 | | 0.5295 | \$ 2,242,000 | |
| 57 - 12KV breaker/recloser replacements - NEW | WPC | March 2018 | December 2018 | August 2019 | | 84% | 0.0111 | | 1.3000 | \$ 10,841,177 | 48 breakers have been completed. |
| Infrared scan and follow-up rehabilitation - NEW | WPC | January 2018 | December 2018 | December 2019 | | 25% | 0.0082 | | 1.0000 | \$ 585,000 | The infrared scan and remediation for priority 1 and priority 2 conditions are complete. The remaining priority 3 and priority 4 conditions are yet to be completed. |
| Tunhannock 00533-65 install automatic switching and provide a 10 mile backfeed to Falls substation | WPC | September 2017 | December 2018 | Unknown | | | 0.0028 | | 0.5280 | \$ 3,186,000 | There is currently a delay in obtaining the right-of-way for this project. The completion date is currently unknown. |

Penn Power Projects 2018

Distribution Line Projects (Project Lead: Line General Manager)

| Project Description | Plan Type | Start Date (Actual/Projected) | Original Projected Completion Date | Updated Projected Completion Date | Actual Completion Date | Percent Complete | Potential SAIFI Reliability Benefit | Potential CAIDI Reliability Benefit | Potential SAIDI Reliability Benefit | Actual Project Cost | Comments |
|---|-------------|----------------------------------|---------------------------------------|--------------------------------------|------------------------|------------------|--|--|--|---------------------|---|
| Install Circuit Ties, Loops, or Sources (19 miles and Build Subs) | Reliability | January 2018 | December 2018 | November 2019 | | 95% | | 0.990 | 1.277 | \$ 7,393,658.18 | One project remaining that was delayed due to permitting. |

West Penn Projects 2018

| Project Description | Plan Type | Start Date (Actual/Projected) | Original Projected Completion Date | Updated Projected Completion Date | Actual Completion Date | Percent Complete | Potential SAIFI Reliability Benefit | Potential CAIDI Reliability Benefit | Potential SAIDI Reliability Benefit | Actual Project Cost | Comments |
|--|-------------|----------------------------------|---------------------------------------|--------------------------------------|------------------------|------------------|--|--|--|---------------------|--|
| Hardware and Coordination Rehabilitation | WPC | January 2018 | December 2018 | | December 31, 2018 | 100% | 0.004 | | 0.180 | \$ 790,000.00 | |
| Subtransmission Modernization and Automation | Reliability | January 2018 | December 2018 | | December 31, 2018 | 100% | 0.005 | | 0.603 | \$ 2,570,000.00 | |
| Enhanced Overcurrent Protection and SCADA Control | Reliability | January 2018 | December 2018 | March 31, 2019 | March 25, 2019 | 100% | 0.003 | | 0.066 | \$ 2,160,000.00 | The two circuits remaining after December 31, 2018 were completed on March 25, 2019. |
| Targeted Mainline Rehabilitation | Reliability | January 2018 | December 2018 | | December 31, 2018 | 100% | 0.006 | | 0.090 | \$ 3,650,000.00 | |

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Joint 2018 Annual Reliability Report – :
Metropolitan Edison Company, :
Pennsylvania Electric Company and :
Pennsylvania Power Company :**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by first class mail, as follows:

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Tanya McCloskey
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555 Walnut Street – 5th Floor
Harrisburg, PA 17101-1923

Richard Kanaskie, Director
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street 2nd Floor West
Harrisburg, PA 17105-3265

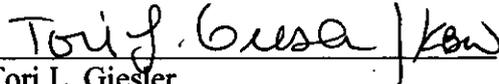
Scott Rubin
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Dated: April 30, 2019


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Counsel for Metropolitan Edison Company,
Pennsylvania Electric Company,
Pennsylvania Power Company and
West Penn Power Company

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