



Energy to do more®

Michael S. Swerling, Esq.

UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406

Post Office Box 858  
Valley Forge, PA 19482-0858

(610) 992-3763 Telephone (direct)  
(610) 992-3258 Facsimile

September 30, 2019

**VIA FEDERAL EXPRESS MAIL**

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Inspection, Maintenance, Repair and Replacement Standards For Electric  
Distribution Companies; Docket No. M-2009-2094773**

Dear Ms. Chiavetta:

Enclosed please find the *Biennial Filing of UGI Utilities, Inc. – Electric Division for the Period of January 1, 2021 through December 31, 2022* (filed in accordance with 52 Pa. Code § 57.198) in the above-referenced docket. Please do not hesitate to contact me directly at (610) 992-3763, if you have any questions.

Sincerely,

  
Michael S. Swerling

Enclosure

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SEP 30 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

# UGI Utilities, Inc.

## 2021 – 2022 Inspection and Maintenance Plan

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### **Introduction**

UGI Utilities Inc., - Electric Division (“UGI Electric” or the “Company”) hereby submits this Biennial Inspection and Maintenance Plan (“I&M Plan” or the “Plan”), pursuant to 52 Pa. Code § 57.198, for the periodic inspection, maintenance, repair and replacement of its facilities (during the January 1, 2021 through December 31, 2022 period). The I&M Plan is designed to facilitate the Company’s compliance with the reliability performance benchmarks and standards established by the Pennsylvania Public Utility Commission (“Commission”).

### **I&M Plan**

***Section 57.198 (b). Plan Consistency.*** *The plan must be consistent with the National Electrical Safety Code, Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission Regulations and the provisions of the American National Standards Institute, Inc.*

UGI Electric’s Plan is consistent with the National Electrical Safety Code, Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission Regulations and the provisions of the American National Standards Institute, Inc. as applicable to the work performed.

***Section 57.198 (m). Recordkeeping.*** *An EDC shall maintain records of its inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair, and replacement programs as required by subsection (n). The records shall be made available to the Commission upon request within 30 days. Examples of sufficient records include:*

- (1) Date-stamped records signed by EDC staff who performed the tasks related to inspection.*
- (2) Maintenance, repair and replacement receipts from independent contractors showing when and what type of inspection, maintenance, repair or replacement work was done.*

UGI Electric maintains records of its biennial inspection and maintenance activities in the form of date-stamped paper or electronic records with the name of the UGI Electric employee that completed the relevant tasks (e.g., inspection, maintenance, repair, and replacement activities). The Company also maintains receipts and/or equivalent computer-based records with the name of independent contractors that similarly complete relevant inspection and maintenance tasks for the Company (including the nature of the work performed).

***Section 57.198 (n) (1). Vegetation Management.*** *The Statewide minimum inspection and treatment cycle for vegetation management is between 4 - 8 years for distribution*

# UGI Utilities, Inc.

## 2021 – 2022 Inspection and Maintenance Plan

facilities. An EDC shall submit a condition-based plan for vegetation management for its distribution system facilities explaining its treatment cycle.

### Vegetation Management Line Inspection

UGI Electric has forty-nine (49) overhead distribution circuits on its system. The total miles of overhead primary line on these circuits is approximately 1,103.40 miles. The circuits are all located in Luzerne and Wyoming Counties, Pennsylvania.

UGI Electric performs a vegetation management inspection on approximately half the total circuit mileage each year ensuring a complete inspection of all overhead facilities every two years. The purpose of the vegetation management inspection is to assess the condition of vegetation on and off the primary lines' right of ways to identify situations that may pose a threat to reliability or may damage overhead distribution facilities. The inspection schedule for 2021 and 2022 is shown below:

	Feeder	Vegetation Management Line Inspection Planned Circuit Miles <i>1,103.40 circuit miles</i>	
		2021	2022
		<b>UGI Utilities, Inc.</b> <i>1,103.40 circuit miles</i>	
	Courtdale 8000	0	39.63
	Courtdale 8002	0	8.76
	Courtdale 8003	0	5.79
	Dallas 350	0	5.75
	Dallas 1930	0	5.66
	Dallas 1954	0	4.32
	Glenview 370	0	1.41
	Glenview 372	0	18.55
	Glenview 8004	0	48.58
	Hunlock 419	19.88	0
	Hunlock 420	124.05	0
	Hunlock 421	48.30	0
	Huntsville 240	0	23.19
	Huntsville 242	0	32.35
	Huntsville 244	0	71.99
	Huntsville 757	0	12.47
	Huntsville 759	0	22.18
	Kingston 315	0	9.41
	Kingston 1215	0	4.29
	Kingston 2530	0	8.99
	Kingston 2555	0	1.71
	Koonsville 7536	35.71	0
	Koonsville 7540	156.10	0
	Huntington Mills 8	41.18	0
	Kunkle 500	0	31.40

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	Kunkle 510	0	40.91
	Kunkle 520	0	57.55
	Lincoln 602	5.36	0
	Lincoln 603	7.46	0
	Lincoln 604	15.94	0
	Lincoln 606	5.47	0
	Loomis 102	7.87	0
	Loomis 103	10.60	0
	Loomis 202	6.05	0
	Loomis 203	4.51	0
	Plymouth 10	6.33	0
	Plymouth 23	10.54	0
	Plymouth 45	15.56	0
	Plymouth 67	5.78	0
	Plymouth 80	41.64	0
	Swoyersville 116	0	13.51
	Swoyersville 147	0	20.32
	Swoyersville 216	0	6.15
	Swoyersville 237	0	5.69
	Swoyersville 247	0	17.02
	Swoyersville 347	0	6.02
	Hanover 70	8.53	0
	Hanover 75	0.05	0
	Hanover 8005	2.87	0

Accordingly, in 2021, UGI Electric plans to inspect 579.8 circuit miles for vegetation management risks. In 2022, UGI Electric plans to inspect 523.6 circuit miles for vegetation management risks.

Vegetation Management Treatment Plan

UGI Electric develops a condition-based vegetation management treatment plan each year. This plan is based largely on the results of its vegetation management line inspections (from the previous year). In addition, the Company reviews the number of tree-related interruptions on feeders (that were inspected in the prior year) and updates their established maintenance cycles (as needed).

For 2021 and 2022, UGI Electric plans to perform vegetation maintenance work on 300-400 miles of distribution overhead lines during the 2021 and 2022 Plan years. This work involves:

- Routine trimming/pruning of vegetation along each circuit per the appropriate specification for the right-of-ways.

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- Distribution herbicide application to limit growth of brush under conductors and along right-of-ways. UGI Electric plans to chemically treat approximately 50 – 100 acres of distribution overhead lines each year.
- An active Danger Tree Removal Program mainly focused on the removal of dead or declining trees on and off-road right-of-ways (when authorized by the landowner) that pose a threat to UGI Electric overhead facilities.

### Vegetation Treatment Cycle

UGI Electric has established vegetation line treatment cycle times for its distribution circuits. The cycle times result from the operation of the vegetation management treatment plan described above. The treatment cycles range from 4 to 8 years. The expected treatment cycles for each of UGI Electric's forty-nine (49) distribution circuits are shown in the table below:

	FEEDER	EXPECTED TREATMENT CYCLE in years
1	Courtdale 8000	6
2	Courtdale 8002	6
3	Courtdale 8003	6
4	Dallas 350	7
5	Dallas 1930	7
6	Dallas 1954	7
7	Glenview 370	7
8	Glenview 372	7
9	Glenview 8004	7
10	Hunlock 419	6
11	Hunlock 420	7
12	Hunlock 421	7
13	Huntsville 240	7
14	Huntsville 242	7
15	Huntsville 244	7
16	Huntsville 757	6
17	Huntsville 759	7
18	Kingston 315	4
19	Kingston 1215	4
20	Kingston 2530	4
21	Kingston 2555	4

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22	Koonsville 7536	6
23	Koonsville 7540	8
24	Huntington Mills 8	8
25	Kunkle 500	7
26	Kunkle 510	7
27	Kunkle 520	6
28	Lincoln St 602	5
29	Lincoln St 603	5
30	Lincoln St 604	5
31	Lincoln St 606	5
32	Loomis 102	5
33	Loomis 103	5
34	Loomis 202	5
35	Loomis 203	5
36	Plymouth 10	5
37	Plymouth 23	5
38	Plymouth 45	5
39	Plymouth 67	5
40	Plymouth 80	6
41	Swoyersville 116	6
42	Swoyersville 147	5
43	Swoyersville 216	4
44	Swoyersville 237	5
45	Swoyersville 247	5
46	Swoyersville 347	6
47	Hanover 70	6
48	Hanover 75	6
49	Hanover 8005	6

**Justification (per Section 57.198 (c))**

This inspection plan complies with the Statewide minimum inspection and treatment cycle of between 4-8 years for distribution facilities. Moreover, the Company's vegetation management is performed in accordance with ANSI A300 and Z133 Standards, utilizing generally accepted industry practices.

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**Section 57.198 (n) (2). Pole Inspections.** *Distribution poles shall be inspected at least as often as every 10-12 years except for the new southern yellow pine creosoted utility poles which shall be initially inspected within 25 years, then within 12 years annually after the initial inspection. Pole inspection must include:*

- (i) *Drill tests at and below ground level.*
- (ii) *A shell test.*
- (iii) *Visual inspection for holes or evidence of insect infestation.*
- (iv) *Visual inspection for evidence of unauthorized backfilling or excavation near the pole.*
- (v) *Visual inspection for signs of lightning strikes.*
- (vi) *A load calculation.*

**Program Description**

UGI Electric inspects all distribution poles on a 10 to 12-year cycle. These inspections maintain system reliability and safety by ensuring that all poles meet or exceed minimum strength requirements to support their attached facilities. The inspections also ensure that the poles and attachments are free from damage and environmental conditions that could compromise these facilities. A maintenance and treatment program (done in conjunction with the distribution pole inspections) aims to extend the useful life of poles.

All poles are inspected for decay, damage, and other potential hazards associated with electrical equipment. Poles suspected of having internal decay are inspected by the sound and bore method. Poles manufactured greater than 20 years before the inspection date are inspected below ground level whenever possible based on installation location and ground conditions (i.e. not installed in concrete or asphalt). The remaining strength of the pole (as compared to the original pole strength when installed) is calculated using data gathered from the inspection. If the remaining strength of the pole is found to be deficient, the pole is classified as: 1) a reject pole (a pole that fails the ground-line inspection but does not meet the criteria found in Section 57.198(n)(3) of the Pennsylvania Code); 2) a re-enforceable reject pole (a pole that can be restored to an acceptable strength when re-enforced with a steel truss or similar device); or 3) a danger pole (danger poles meet the criteria found in Section 57.198(n)(3)).

Further details can be found in UGI Electric's T&D Engineering Instruction Manual, Section 10.8.

**Pole Inspection Plan**

UGI Utilities, Inc.	Area	Pole Inspections Planned (Number of Poles)	
		2021	2022

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Approximately 45,000 distribution poles, system wide	All or portions of Dallas Borough, Dallas Township, Monroe Township, and Noxen	3,100	2,000
	All or portions of Jackson Township, Kingston Township, Lehman Township, Plymouth, Township, Lake Township and Harvey's Lake Borough	650	1,800

Justification (per Section 57.198 (c))

UGI Electric is requesting a waiver from pole loading calculations under Section 57.198(n)(2)(vi) due to construction standards that, at a minimum, require the use of a class 3-40 foot pole for primary construction and more typically a class 2-45 foot pole based on the need for additional pole space. In addition, a review of interruption data from December 2017 through June 2019 indicates pole failures accounted for only 0.25% of the system interruptions and contributed just 0.03% of the total customer minutes interrupted for the period. The inclusion of pole loading calculations result in a significant cost relative to the inspection and maintenance program without an appreciable increase in reliability.

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**Section 57.198 (n) (3). Pole Inspection Failure.** *If a pole fails the groundline inspection and shows dangerous conditions that are an immediate risk to public or employee safety or conditions affecting the integrity of the circuit, the pole shall be replaced within 30 days of the date of inspection.*

**Corrective Maintenance**

Pole inspections that result in a Section 57.198(n)(3) determination are brought to the attention of UGI Electric's program administrator and prioritized accordingly. UGI Electric replaces these poles within 30 days of the date of inspection. Poles classified as rejects, that are not considered an immediate priority, are scheduled for replacement based on criticality. UGI Electric has seen an increase in pole reject rates in recent years, which has resulted in an accelerated pole replacement program under the Company's Electric Long-Term Infrastructure Improvement Plan ("LTIIIP").

**Justification (per Section 57.198 (c))**

UGI Electric's Corrective Maintenance Program meets the requirements of 52 Pa. Code § 57.198 (n)(3).

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**Section 57.198 (n) (4). Distribution Overhead Line Inspections.** *Distribution lines shall be inspected by ground patrol a minimum of once every 1-2 years. A visual inspection must include checking for:*

- I. *Broken insulators.*
- II. *Conditions that may adversely affect operation of the overhead distribution line.*
- III. *Other conditions that may adversely affect operation of the overhead distribution line.*

**Program Description**

UGI Electric inspects its overhead distribution facilities by ground patrol every two years. The purpose of the inspection program is to verify that the overhead facilities are in a safe, operational, and reliable condition. The inspections are performed by qualified company representatives or approved contractors. The overhead lines and equipment are inspected for damage including broken insulators, failed cross-arms, leaks, and any other conditions which may adversely affect the distribution system. Inspection information is documented and forwarded to the appropriate Engineering department when corrective action is required.

Further details can be found in UGI Electric's T&D Engineering Instruction Manual, Section 02-02.

**Distribution Overhead Line Inspection Plan**

	Feeder	Overhead Line Inspection Plan <i>1,103.40 circuit miles</i>	
		2021	2022
<b>UGI Utilities, Inc.</b> <i>1,103.40 circuit miles</i>	Courtdale 8000	0	39.63
	Courtdale 8002	0	8.76
	Courtdale 8003	0	5.79
	Dallas 350	0	5.75
	Dallas 1930	0	5.66
	Dallas 1954	0	4.32
	Glenview 370	0	1.41
	Glenview 372	0	18.55
	Glenview 8004	0	48.58
	Hunlock 419	19.88	0
	Hunlock 420	124.05	0
	Hunlock 421	48.30	0
	Huntsville 240	0	23.19
	Huntsville 242	0	32.35
Huntsville 244	0	71.99	
Huntsville 757	0	12.47	
Huntsville 759	0	22.18	

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	Kingston 315	0	9.41
	Kingston 1215	0	4.29
	Kingston 2530	0	8.99
	Kingston 2555	0	1.71
	Koonsville 7536	35.71	0
	Koonsville 7540	156.10	0
	Huntington Mills 8	41.18	0
	Kunkle 500	0	31.40
	Kunkle 510	0	40.91
	Kunkle 520	0	57.55
	Lincoln 602	5.36	0
	Lincoln 603	7.46	0
	Lincoln 604	15.94	0
	Lincoln 606	5.47	0
	Loomis 102	7.87	0
	Loomis 103	10.60	0
	Loomis 202	6.05	0
	Loomis 203	4.51	0
	Plymouth 10	6.33	0
	Plymouth 23	10.54	0
	Plymouth 45	15.56	0
	Plymouth 67	5.78	0
	Plymouth 80	41.64	0
	Swoyersville 116	0	13.51
	Swoyersville 147	0	20.32
	Swoyersville 216	0	6.15
	Swoyersville 237	0	5.69
	Swoyersville 247	0	17.02
	Swoyersville 347	0	6.02
	Hanover 70	8.53	0
	Hanover 75	0.05	0
	Hanover 8005	2.87	0

Justification (per Section 57.198 (c))

UGI's Distribution Overhead Line Inspection Plan meets the requirements of 52 Pa. Code § 57.198 (n) (4).

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2021 – 2022 Inspection and Maintenance Plan

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**Section 57.198 (n) (5). Inspection Failure.** *If critical maintenance problems are found that affect the integrity of the circuits, they shall be repaired or replaced no later than 30 days from discovery.*

**Corrective Maintenance**

Any deficiencies on UGI Electric's overhead distribution system, discovered during performance of its Distribution Overhead Line Inspections, are addressed based on the severity of the situation. Those items that may affect the integrity of circuits are repaired or replaced within 30 days of discovery. Safety issues are addressed immediately.

UGI Electric maintains adequate inventory and manpower to take corrective actions as indicated above.

**Justification (per Section 57.198 (c))**

UGI Electric's Distribution Overhead Line Inspection Plan meets the requirements of 52 Pa. Code § 57.198 (n) (5).

**UGI Utilities, Inc.**  
**2021 – 2022 Inspection and Maintenance Plan**

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**Section 57.198 (n) (6). Distribution Transformer Inspections.** *Overhead distribution transformers shall be visually inspected as part of the distribution line inspection every 1-2 years. Above-ground pad-mounted transformers shall be inspected at least as often as every 5 years and below-ground transformers shall be inspected at least as often as every 8 years. An inspection must include checking for:*

- (i) *Rust, dents or other evidence of contact*
- (ii) *Leaking oil*
- (iii) *Installations of fences or shrubbery that could adversely affect access to and operation of the transformer*
- (iv) *Unauthorized excavation or changes in grade near the transformer.*

**Program Description**

UGI Electric inspects all of its overhead distribution transformers on a two-year cycle as part of the overhead distribution line inspection program.

UGI Electric inspects all of its padmount and below ground transformers on a five-year cycle. The purpose of the inspection is to verify that all transformers are in a safe, operational, and reliable condition. The inspections are performed by qualified company representatives or approved contractors. The inspectors look for rust, dents and other evidence of contact, leaking oil, installations of fences and shrubbery that could adversely affect access to and operation of the transformer, unauthorized excavations or changes in grade near the transformer, and any other conditions which may affect the safety, access to or operation of the transformer.

Inspection information is documented. Conditions that require follow up are forwarded to the Engineering department for corrective action. Safety related issues are corrected immediately. Other reported problems are handled based on the severity of the situation.

UGI Electric maintains adequate inventory and manpower to take corrective action as indicated above.

Further details can be found in UGI Electric's T&D Utilities Engineering Instruction Manual, Section 02-08.

**Distribution Transformer Inspection Plan**

<b>UGI Utilities, Inc.</b> <i>11,343 Overhead Type</i> <i>2 Year Cycle</i>	Transformer Inspections Planned	
	Feeder	
	2021	2022
Courtdale 8000	0	424

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2021 – 2022 Inspection and Maintenance Plan

	Courtdale 8002	0	126
	Courtdale 8003	0	86
	Dallas 1930	0	51
	Dallas 1954	0	55
	Dallas 350	0	73
	Glenview 370	0	12
	Glenview 372	0	218
	Glenview 8004	0	504
	Hanover 0070	96	0
	Hanover 0075	10	0
	Hanover 8005	62	0
	Hanover 8006	0	0
	Hanover 8007	0	0
	Hanover 8010	0	0
	Hunlock 419	171	0
	Hunlock 420	1284	0
	Hunlock 421	466	0
	Huntsville 240	0	268
	Huntsville 242	0	270
	Huntsville 244	0	704
	Huntsville 757	0	169
	Huntsville 759	0	236
	Kingston 315	0	161
	Kingston 1215	0	72
	Kingston 2530	0	159
	Kingston 2555	0	26
	Koonsville 7536	292	0
	Koonsville 7540	1654	0
	Kunkle 500	0	291
	Kunkle 510	0	346
	Kunkle 520	0	557
	Lincoln Street 602	63	0
	Lincoln Street 603	91	0
	Lincoln Street 604	198	0
	Lincoln Street 606	52	0
	Loomis 102	70	0
	Loomis 103	124	
	Loomis 202	68	0

UGI Utilities, Inc.

2021 – 2022 Inspection and Maintenance Plan

	Loomis 203	23	
	Plymouth 10	91	0
	Plymouth 23	134	0
	Plymouth 45	196	0
	Plymouth 67	67	0
	Plymouth 80	411	0
	Swoyersville 116	0	207
	Swoyersville 147	0	248
	Swoyersville 216	0	83
	Swoyersville 237	0	68
	Swoyersville 247	0	219
	Swoyersville 347	0	87

	Feeder	Transformer Inspection Plan	
		2021	2022
<b>UGI Utilities, Inc.</b> <i>442 Padmount &amp; Below Ground Type 5 Year Cycle</i>	Courtdale 8000	20	0
	Courtdale 8002	0	24
	Courtdale 8003	0	0
	Dallas 350	8	14
	Dallas 1930	0	11
	Dallas 1954	0	11
	Glenview 370	0	15
	Glenview 372	0	7
	Glenview 8004	32	3
	Hunlock 419	0	0
	Hunlock 420	0	0
	Hunlock 421	14	0
	Huntsville 240	33	27
	Huntsville 242	2	0
	Huntsville 244	0	6
	Kingston 315	6	0
	Kingston 1215	0	0
	Kingston 2530	0	0
	Kingston 2555	0	0
	Koonsville 7536	0	4
Koonsville 7540	0	0	
Kunkle 500	15	1	
Kunkle 510	0	5	
Kunkle 520	0	0	
Lincoln 602	0	2	

UGI Utilities, Inc.  
 2021 – 2022 Inspection and Maintenance Plan

	Lincoln 603	18	0
	Lincoln 604	0	1
	Lincoln 606	4	0
	Loomis 102	0	0
	Loomis 103	2	0
	Loomis 202	0	0
	Loomis 203	3	0
	Plymouth 10	0	0
	Plymouth 23	0	51
	Plymouth 45	2	2
	Plymouth 67	0	0
	Plymouth 80	15	22
	Swoyersville 116	2	11
	Swoyersville 147	0	10
	Swoyersville 216	0	0
	Swoyersville 237	4	0
	Swoyersville 247	0	0
	Swoyersville 347	0	0
	Hanover 70	28	7
	Hanover 75	0	0
	Hanover 8005	0	0
	Hanover 8006	0	0
	Hanover 8007	0	0

Justification (per Section 57.198 (c))

UGI Electric's Distribution Transformer Inspection Plan meets the requirements of 52 Pa. Code § 57.198 (n) (6).

**UGI Utilities, Inc.**  
**2021 – 2022 Inspection and Maintenance Plan**

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**Section 57.198 (n) (7). Recloser Inspections.** *Three-phase reclosers shall be inspected on a cycle of 8 years or less. Single-phase reclosers shall be inspected as part of the EDC's individual distribution line inspection plan.*

**Program Description**

UGI Electric inspects all of its three phase reclosers on a one-year cycle or less. UGI Electric inspects all single phase reclosers on a two-year cycle as part of the distribution overhead line inspection program.

The purpose of performing the inspections is to ensure continued safe and reliable operation of the reclosers. The inspections are conducted by qualified company representatives. The inspection check for physical damage, oil leaks, and any other conditions that could adversely affect the safe and reliable operation of the recloser.

Inspection information is documented. Conditions that require follow up are forwarded to the Engineering department for corrective action. Safety related issues are corrected immediately. Other reported problems are handled based on the severity of the situation.

Further details can be found in UGI Electric's T&D Engineering Instruction Manual, Section 02-06.

**Recloser Inspection Plan**

	Type	Recloser Inspection Plan	
		2021	2022
<b>UGI Utilities, Inc.</b> <i>106 Three Phase</i> <i>175 Single Phase</i>	Three Phase 1 Yr Cycle	106	106
	Single Phase 2 Yr Cycle	87	88

**Justification (per Section 57.198 (c))**

UGI Electric's Recloser Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (7).

**UGI Utilities, Inc.**  
**2021 – 2022 Inspection and Maintenance Plan**

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**Section 57.198 (n) (8). Substation Inspections.** *Substation equipment, structures, and hardware shall be inspected on a cycle of 5 weeks or less.*

Program Description

UGI Electric inspects all of its distribution substations on a cycle of 5 weeks or less. The inspections are conducted by qualified company representatives. The inspectors walk through each substation yard and control house documenting various equipment parameters and noting any physical damage, unsafe conditions, or potential problems with substation equipment, structures, and hardware. Substation fence integrity is verified along with the posting of danger and no trespassing signs. A description of the Company's Substation Inspection Program can be found in UGI Electric's T&D Engineering Instruction Manual, Sections 4-2-1 & 4-2-2.

The purpose of substation inspections is to ensure continued safe and reliable operation of the substations.

Inspection information is documented. Conditions that require follow-up are forwarded to the Engineering department for corrective action. Safety related issues are corrected immediately. Other reported problems are handled based on the severity of the situation.

Substation Inspection Plan

	Substation	Substation Inspection Plan	
		2021	2022
<b>UGI Utilities, Inc.</b> <i>Total Substations 15</i>	Mountain 230/66	12	12
	Courtdale 66/13	12	12
	Dallas 66/13	12	12
	Glenview 66/13	12	12
	Hanover 66/13	12	12
	Hunlock 66/13	12	12
	Huntington Mills 13/8	12	12
	Huntsville 66/13	12	12
	Kingston 66/13	12	12
	Koonsville 66/13	12	12
	Kunkle 66/13	12	12
	Lincoln 66/13	12	12
	Loomis 66/13	12	12
	Plymouth/Lance 66/13	12	12
	Swoyersville 66/13	12	12

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**Justification (per Section 57.198 (c))**

UGI Electric's Substation Inspection Plan, which follows a monthly inspection cycle, is in-line with industry standards and meets the requirements of 52 Pa. Code § 57.198 (n) (8).

ORIGIN ID: KPDA (610) 768-3614  
CAROLE KENNEY  
UGIAMERIGAS  
480 NORTH GULPH ROAD

KING OF PRUSSIA, PA 19406  
UNITED STATES US

SHIP DATE: 30SEP19  
ACTWGT: 0.50 LB  
CAD: 107230300/NET4160

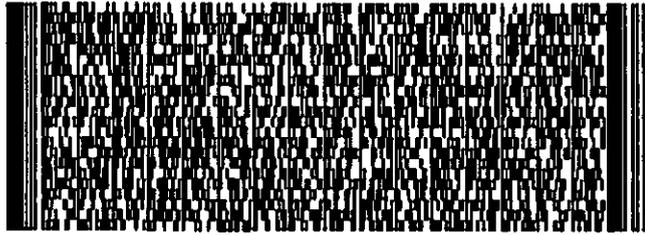
BILL SENDER

567.012A3C05A2

TO ROSEMARY CHIAVETTA, SECRETARY  
PENNSYLVANIA PUBLIC UTILITY COMMISS  
400 NORTH STREET  
COMMONWEALTH KEYSTONE BUILDING  
HARRISBURG PA 17102

(717) 787-9009  
INV:  
PO:

REF: 8315 - MIKES  
DEPT:

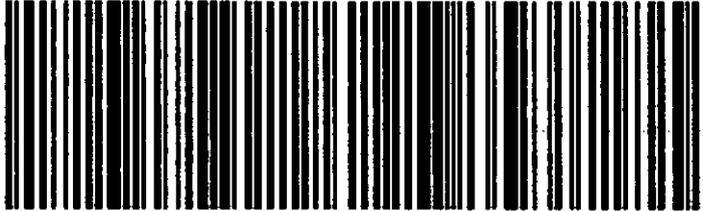


TUE - 01 OCT 3:00P  
STANDARD OVERNIGHT

TRK# 7763 9361 4002  
0201

EN MDTA

17102  
PA-US MDT



After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning:** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

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