

Tori L. Giesler, Esq.  
(610) 921-6658  
(610) 939-8655 (Fax)

May 1, 2020

**VIA ELECTRONIC MAIL**

Rosemary Chiavetta, Secretary  
rchiavetta@pa.gov

**Re: Met-Ed Biennial Inspection, Maintenance, Repair and Replacement Plan  
(2021 through 2022), Docket No. M-2009-2094773**

Dear Secretary Chiavetta:

Pursuant to Ordering Paragraph No. 7 of the Opinion and Order entered on January 16, 2020 at Docket Nos. P-2019-3012618, P-2019-3012617, P-2019-3012615, and P-2019-3012614, Metropolitan Edison Company, West Penn Power Company, Pennsylvania Electric Company, and Pennsylvania Power Company resubmit the enclosed Pole Backlog Corrective Action Plan to the above-referenced docket number.

Please contact me if you have any questions regarding this matter.

Very truly yours,



Tori L. Giesler

kbw  
Enclosures

c: Brent Killian, Bureau of Investigation and Enforcement (via electronic mail)  
David Washko, Bureau of Investigation and Enforcement (via electronic mail)  
Daniel Searfoorce, Bureau of Technical Utility Services (via electronic mail)  
John VanZant, Bureau of Technical Utility Services (via electronic mail)

## POLE CORRECTIVE ACTION PLAN

### PURPOSE

Pursuant to the Pennsylvania Public Utility Commission’s Opinion and Order (“Order”) entered on January 16, 2020,<sup>1</sup> Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (individually, the “Company” and collectively, the “Companies”), have developed the following Distribution Pole Corrective Action Plan (“Pole CAP”) designed to bring their respective distribution pole replacement and reinforcement backlogs to no more than two years. The Pole CAP is designed as two parts. First, the Pole CAP outlines how the pole replacement/reinforcement backlog will be reduced in the next five years to achieve a steady state of no greater than a two-year backlog. Second, the Pole CAP outlines the quality management controls the Companies will employ to ensure the Pole CAP is completed as designed and distribution poles are “maintained at a no more than two-year backlog or better, and not to exceed 25% of the 2-year backlog frequency, which is 6 months”<sup>2</sup> once the Pole CAP is completed.

Although the Opinion and Order directs the Companies to outline in the Pole CAP how the distribution pole backlog will be reduced outside of the Companies’ 2020-2024 Long Term Infrastructure Improvement Plans (“LTIIIP II”), the Companies’ LTIIIP II, specifically the Pole Replacement/Reinforcement initiative designed to target pole reinforcements and replacements, serves as a critical first step in reducing the pole backlog. In fact, for two of the Companies, Penn Power and West Penn, the LTIIIP II will reduce the distribution pole backlog to the level specified within the Commission’s Order without further action. Therefore, the Backlog Reduction Plan defined below is specific to Met-Ed and Penelec. With regard to Quality Management Controls, measures will be established and monitored for each of Met-Ed, Penelec, Penn Power and West Penn.

### BACKLOG REDUCTION PLAN

1. Met-Ed and Penelec’s respective distribution pole replacement/reinforcement backlogs will be reduced to no more than a two-year backlog by the end of 2024. Backlogs will be targeted by the inspection year in which the subject poles were identified (i.e., oldest inspection year first), location of poles (i.e., targeting groups of poles in proximity for efficiency), with an initial focus on reinforcing poles in order to minimize the number of poles moving from reinforcement to replacement.
2. The backlog starting point for Met-Ed and Penelec are those distribution poles identified as of December 31, 2019. The plan will also include any distribution poles newly identified effective January 1, 2020 through December 31, 2022. These poles will also be completed over the course of the five-year plan, specifically during the 2020 – 2024 window. Met-Ed and Penelec anticipate achieving the following milestones:

#### Met-Ed

During the period of 2020-2024, Met-Ed projects remediating a total of 21,918 poles.

- 12% to be completed in 2020
- 21% to be completed in 2021

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<sup>1</sup> Opinion and Order entered January 16, 2020 at Docket Nos. M-2019-3012618, M-2019-3012617, M-2019-3012615 and M-2019-3012614.

<sup>2</sup> Id. at 27.

## **POLE CORRECTIVE ACTION PLAN**

- 36% to be completed in 2022
- 14% to be completed in 2023
- 17% to be completed in 2024

### Penelec

During the period of 2020-2024, Penelec projects remediating a total of 12,005 poles.

- 35% to be completed in 2020
- 18% to be completed in 2021
- 23% to be completed in 2022
- 18% to be completed in 2023
- 6% to be completed in 2024

## **QUALITY MANAGEMENT CONTROLS**

### Pole CAP/LTIIP II

During the term of the Pole CAP, Met-Ed and Penelec's leadership and appropriate personnel will review the status of their Company's Pole CAP monthly and make appropriate adjustments as identified to ensure that annual and overall Pole CAP goals are achieved. Penn Power and West Penn will perform the same monthly review to ensure that annual and LTIIP II goals specific to the Pole Replacement/Reinforcement initiative are achieved. Second, a new report will be reviewed monthly by Executive, State, and Company leadership to monitor each Company's progress toward achieving annual and total goals as established in the Pole CAP and LTIIP II. Quarterly meetings will be established with State and Company leadership and the appropriate personnel to further review the Pole CAP/LTIIP II status and to identify necessary adjustments that might be needed to successfully achieve the Pole CAP/LTIIP II both annually and in total. Finally, the Companies will submit a status report of the Pole CAP/LTIIP II on March 1 of each year through March 1, 2025 to the Bureau of Technical Utility Services detailing their progress over the course of the prior calendar year.

### Post Pole CAP/LTIIP II

Beginning in January 2025, the Companies will add a new report to the Pennsylvania Management Reports to monitor poles requiring remediation and to ensure that poles do not exceed a two-year backlog. The report will be reviewed at regular intervals by State and Company leadership. Further, the corrective maintenance section of the Companies' Wood Pole Groundline, Distribution Inspection & Maintenance Practice will be modified to indicate that the pole backlog will not exceed more than two-years. This revision will be effective January 1, 2025. Similarly, the corrective maintenance section of the Companies' Biennial Inspection, Maintenance, Repair and Replacement Plans for distribution poles will be modified to indicate that the pole backlog will not exceed more than two years. This revision will also be effective January 1, 2025.<sup>3</sup>

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<sup>3</sup> The Companies' Biennial Inspection, Maintenance, Repair and Replacement Plans for 2025 will be filed on or before October 1, 2023.