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October 21, 2021

**VIA EXPRESS MAIL**

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 Secretary Chiavetta:

UGI Utilities, Inc. – Electric Division (“UGI Electric”) hereby requests that the enclosed Biennial Filing of UGI Utilities, Inc. – Electric Division’s Biennial Plan for the Periodic Inspection, Maintenance, Repair and Replacement of Facilities for the period of January 1, 2023 through December 31, 2024 (the “Plan”) be accepted *Nunc Pro Tunc*. Pursuant to 52 Pa. Code §57.198(a), the Plan was due on October 1, 2021. The Company’s failure to submit the report by the due date was inadvertent in nature.

Should you have any questions concerning this filing, please feel free to contact Eric Sorber at 570-332-4272 or [esorber@ugi.com](mailto:esorber@ugi.com).

Respectfully submitted,

/s/ Michael S. Swerling

Michael S. Swerling

Enclosure

**Biennial Inspection, Maintenance, Repair and Replacement Plan  
of UGI Utilities, Inc. – Electric Division  
For the period of January 1, 2023 – December 31, 2024**

**Submitted by:**

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**Dated: October 21, 2021**

# UGI Utilities, Inc.

## 2023 – 2024 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, 2023 through December 31, 2024 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 (e.g. work orders and associated time-sheets) 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.

## 2023 – 2024 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 fifty (50) overhead distribution circuits on its system. The total miles of overhead primary line on these circuits is approximately 1,104 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 2023 and 2024 is shown below:

UGI Utilities Inc.		Vegetation Management Line Inspection	
		Planned Circuit Miles	
Feeder Count	Feeder Name	<i>1,104.38 (total circuit miles)</i>	
		2023	2024
1	Courtdale 8000	0	39.63
2	Courtdale 8002	0	8.76
3	Courtdale 8003	0	5.79
4	Dallas 350	0	5.75
5	Dallas 1930	0	5.66
6	Dallas 1954	0	4.32
7	Glenview 370	0	1.41
8	Glenview 372	0	18.55
9	Glenview 8004	0	48.58
10	Hunlock 419	19.88	0
11	Hunlock 420	124.05	0
12	Hunlock 421	48.30	0
13	Huntsville 240	0	23.19
14	Huntsville 242	0	32.35
15	Huntsville 244	0	71.99
16	Huntsville 757	0	12.47
17	Huntsville 759	0	22.18
18	Kingston 315	0	9.41

UGI Utilities, Inc.  
 2023 – 2024 Inspection and Maintenance Plan

19	Kingston 1215	0	4.29
20	Kingston 2530	0	8.99
21	Kingston 2555	0	1.71
22	Koonsville 7536	35.71	0
23	Koonsville 7540	197.28	0
24	Kunkle 500	0	31.4
25	Kunkle 510	0	40.91
26	Kunkle 520	0	57.55
27	Lincoln 602	5.36	0
28	Lincoln 603	7.46	0
29	Lincoln 604	15.94	0
30	Lincoln 606	5.47	0
31	Loomis 102	7.87	0
32	Loomis 103	10.60	0
33	Loomis 104	0.30	0
34	Loomis 202	6.05	0
35	Loomis 203	4.51	0
36	Loomis 204	0.70	0
37	Plymouth 10	6.33	0
38	Plymouth 23	10.54	0
39	Plymouth 45	15.56	0
40	Plymouth 67	5.78	0
41	Plymouth 80	41.64	0
42	Swoyersville 116	0	13.51
43	Swoyersville 147	0	20.32
44	Swoyersville 216	0	6.15
45	Swoyersville 237	0	5.69
46	Swoyersville 247	0	17.02
47	Swoyersville 347	0	6.02
48	Hanover 70	8.53	0
49	Hanover 75	0.05	0
50	Hanover 8005	2.87	0

Accordingly, in 2023 and 2024, UGI Electric plans to inspect 580.6 circuit miles and 523.6 circuit miles respectively, for vegetation management risks.

# UGI Utilities, Inc.

## 2023 – 2024 Inspection and Maintenance Plan

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### 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 2023 and 2024, UGI Electric plans to perform vegetation maintenance work on 300-400 miles of distribution overhead lines during the 2023 and 2024 Plan years. This work involves:

- Routine trimming/pruning of vegetation along each circuit per the appropriate specification for the right-of-ways.
- 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 focuses 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 fifty (50) overhead distribution circuits are shown in the table below:

<b>Feeder Count</b>	<b>Feeder Name</b>	<b>EXPECTED TREATMENT CYCLE (Years)</b>
1	Courtdale 8000	6
2	Courtdale 8002	6
3	Courtdale 8003	6
4	Dallas 350	6
5	Dallas 1930	6
6	Dallas 1954	6
7	Glenview 370	6
8	Glenview 372	6
9	Glenview 8004	7

UGI Utilities, Inc.  
2023 – 2024 Inspection and Maintenance Plan

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	6
18	Kingston 315	4
19	Kingston 1215	4
20	Kingston 2530	4
21	Kingston 2555	4
22	Koonsville 7536	6
23	Koonsville 7540	8
24	Kunkle 500	7
25	Kunkle 510	7
26	Kunkle 520	6
27	Lincoln St 602	5
28	Lincoln St 603	5
29	Lincoln St 604	5
30	Lincoln St 606	5
31	Loomis 102	4
32	Loomis 103	4
33	Loomis 104	4
34	Loomis 202	4
35	Loomis 203	4
36	Loomis 204	4
37	Plymouth 10	5
38	Plymouth 23	5
39	Plymouth 45	5
40	Plymouth 67	5
41	Plymouth 80	6
42	Swoyersville 116	5
43	Swoyersville 147	5
44	Swoyersville 216	5
45	Swoyersville 237	5
46	Swoyersville 247	5
47	Swoyersville 347	5
48	Hanover 70	6
49	Hanover 75	6
50	Hanover 8005	6

# UGI Utilities, Inc.

## 2023 – 2024 Inspection and Maintenance Plan

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### 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 per Section 57.198(n)(1). Moreover, the Company's vegetation management is performed in accordance with ANSI A300 and Z133 Standards, utilizing generally accepted industry practices.

**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)).

# UGI Utilities, Inc. 2023 – 2024 Inspection and Maintenance Plan

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)	
		2023	2024
Approximately 45,000 distribution poles, system wide	All or portions of Ross Township and Union Township	2,100	400
	All or portions of Lake Township and Noxen Township	1,700	0
	All or portions of Huntington Township, Jackson Township, Lehman Township, Hunlock Township, Plymouth Township	0	3,400

## 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 2019 through June 2021 identified only three (3) pole failures which contributed just 0.002% of the total customer minutes interrupted for the period. The inclusion of pole loading calculations would result in a significant cost increase relative to the inspection and maintenance program without an appreciable increase in reliability.

UGI Utilities, Inc.  
2023 – 2024 Inspection and Maintenance Plan

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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 UGI 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).

# UGI Utilities, Inc.

## 2023 – 2024 Inspection and Maintenance Plan

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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

<b>UGI Utilities Inc.</b>		<b>Overhead Line Inspection Plan</b>	
<b>Feeder Count</b>	<b>Feeder Name</b>	<b>Planned Circuit Miles</b>	
		<b>1,104.38 (total circuit miles)</b>	
		<b>2023</b>	<b>2024</b>
1	Courtdale 8000	0	39.63
2	Courtdale 8002	0	8.76
3	Courtdale 8003	0	5.79
4	Dallas 350	0	5.75
5	Dallas 1930	0	5.66
6	Dallas 1954	0	4.32
7	Glenview 370	0	1.41
8	Glenview 372	0	18.55
9	Glenview 8004	0	48.58
10	Hunlock 419	19.88	0
11	Hunlock 420	124.05	0

UGI Utilities, Inc.  
 2023 – 2024 Inspection and Maintenance Plan

12	Hunlock 421	48.30	0
13	Huntsville 240	0	23.19
14	Huntsville 242	0	32.35
15	Huntsville 244	0	71.99
16	Huntsville 757	0	12.47
17	Huntsville 759	0	22.18
18	Kingston 315	0	9.41
19	Kingston 1215	0	4.29
20	Kingston 2530	0	8.99
21	Kingston 2555	0	1.71
22	Koonsville 7536	35.71	0
23	Koonsville 7540	197.28	0
24	Kunkle 500	0	31.40
25	Kunkle 510	0	40.91
26	Kunkle 520	0	57.55
27	Lincoln 602	5.36	0
28	Lincoln 603	7.46	0
29	Lincoln 604	15.94	0
30	Lincoln 606	5.47	0
31	Loomis 102	7.87	0
32	Loomis 103	10.60	0
33	Loomis 104	0.30	0
34	Loomis 202	6.05	0
35	Loomis 203	4.51	0
36	Loomis 204	0.70	0
37	Plymouth 10	6.33	0
38	Plymouth 23	10.54	0
39	Plymouth 45	15.56	0
40	Plymouth 67	5.78	0
41	Plymouth 80	41.64	0
42	Swoyersville 116	0	13.51
43	Swoyersville 147	0	20.32
44	Swoyersville 216	0	6.15
45	Swoyersville 237	0	5.69
46	Swoyersville 247	0	17.02
47	Swoyersville 347	0	6.02

UGI Utilities, Inc.  
2023 – 2024 Inspection and Maintenance Plan

48	Hanover 70	8.53	0
49	Hanover 75	0.05	0
50	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).

UGI Utilities, Inc.  
2023 – 2024 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.

## 2023 – 2024 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.

UGI Utilities, Inc.  
2023 – 2024 Inspection and Maintenance Plan

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Distribution Transformer Inspection Plan

UGI Utilities, Inc.	Overhead Transformer Inspections Planned		
	Feeder	Overhead Transformer/Feeder	
		2023	2024
11,388 Overhead Type 2 Year Cycle			
1	Courtdale 8000	0	426
2	Courtdale 8002	0	127
3	Courtdale 8003	0	87
4	Dallas 1930	0	52
5	Dallas 1954	0	57
6	Dallas 350	0	74
7	Glenview 370	0	13
8	Glenview 372	0	214
9	Glenview 8004	0	511
10	Hanover 0070	98	0
11	Hanover 0075	11	0
12	Hanover 8005	28	0
13	Hunlock 419	170	0
14	Hunlock 420	1198	0
15	Hunlock 421	468	0
16	Huntsville 240	0	268
17	Huntsville 242	0	273
18	Huntsville 244	0	815
19	Huntsville 757	0	170
20	Huntsville 759	0	237
21	Kingston 315	0	168
22	Kingston 1215	0	71
23	Kingston 2530	0	157
24	Kingston 2555	0	26
25	Koonsville 7536	581	0
26	Koonsville 7540	1370	0
27	Kunkle 500	0	293
28	Kunkle 510	0	350
29	Kunkle 520	0	555

UGI Utilities, Inc.  
2023 – 2024 Inspection and Maintenance Plan

30	Lincoln Street 602	60	0
31	Lincoln Street 603	94	0
32	Lincoln Street 604	204	0
33	Lincoln Street 606	54	0
34	Loomis 102	75	0
35	Loomis 103	123	0
36	Loomis 104	0	0
37	Loomis 202	69	0
38	Loomis 203	24	0
39	Loomis 204	0	0
40	Plymouth 10	89	0
41	Plymouth 23	134	0
42	Plymouth 45	198	0
43	Plymouth 67	66	0
44	Plymouth 80	411	0
45	Swoyersville 116	0	211
46	Swoyersville 147	0	248
47	Swoyersville 216	0	84
48	Swoyersville 237	0	68
49	Swoyersville 247	0	155
50	Swoyersville 347	0	153

UGI Utilities Inc. Padmount & Below Ground Transformers 5 Yr Cycle	Feeder	Transformer Inspection Plan	
		Transformers/Feeder	
		2023	2024
1	Courtdale 8000	3	10
2	Courtdale 8002	2	0
3	Courtdale 8003	0	0
4	Dallas 350	0	0
5	Dallas 1930	6	12
6	Dallas 1954	2	2
7	Glenview 370	0	0

UGI Utilities, Inc.  
2023 – 2024 Inspection and Maintenance Plan

8	Glenview 372	4	14
9	Glenview 8004	17	46
10	Hunlock 419	0	5
11	Hunlock 420	0	1
12	Hunlock 421	2	0
13	Huntsville 240	49	0
14	Huntsville 242	6	21
15	Huntsville 244	0	0
16	Kingston 315	0	0
17	Kingston 1215	22	0
18	Kingston 2530	0	0
19	Kingston 2555	0	0
20	Koonsville 7536	0	0
21	Koonsville 7540	0	5
22	Kunkle 500	0	5
23	Kunkle 510	0	0
24	Kunkle 520	2	2
25	Lincoln 602	0	12
26	Lincoln 603	0	0
27	Lincoln 604	9	16
28	Lincoln 606	7	7
29	Loomis 102	0	0
30	Loomis 103	0	0
31	Loomis 104	0	0
32	Loomis 202	0	0
33	Loomis 203	0	0
34	Loomis 204	0	0
35	Plymouth 10	23	0
36	Plymouth 23	23	1
37	Plymouth 45	0	0
38	Plymouth 67	0	0
39	Plymouth 80	7	15
40	Swoyersville 116	0	0
41	Swoyersville 147	0	5

UGI Utilities, Inc.  
 2023 – 2024 Inspection and Maintenance Plan

42	Swoyersville 216	0	0
43	Swoyersville 237	0	0
44	Swoyersville 247	1	3
45	Swoyersville 347	0	3
46	Hanover 70	13	2
47	Hanover 75	0	13
48	Hanover 8005	0	0
49	Hanover 8006	0	0
50	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.

## 2023 – 2024 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	
		2023	2024
<b>UGI Utilities, Inc.</b> <i>128 Three Phase</i> <i>159 Single Phase</i>	Three Phase 1 Yr Cycle	128	140
	Single Phase 2 Yr Cycle	79	80

### Justification (per Section 57.198 (c))

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

# UGI Utilities, Inc.

## 2023 – 2024 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	
		2023	2024
<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

UGI Utilities, Inc.  
2023 – 2024 Inspection and Maintenance Plan

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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).