

1 -----
2 Carolyn D. Onyeka,
3 v.
4 Metropolitan Edison
5 Company
6
7 Initial Call-In
8 Telephonic Hearing
9 -----

Docket No.: C-2021-3028342

10 Pages 1 - 83

Judge's Chambers
Keystone Building
400 North Street
Harrisburg, PA 17120

November 17, 2021
Commencing at 10:25 a.m.

11
12
13
14
15
16
17
18

19
20
21
22

23
24
25

26
27
28
29
30
31
32
33
34
35

INDEX TO EXHIBITS

Docket No. C-2021-3028342

Hearing Date: November 17, 2021

<u>NUMBER</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
Respondent Exhibit 1:		
Customer Contact	25	37
Respondent Exhibit 2:		
Account Statement	26	37
Respondent Exhibit 3:		
Internal Notification dated 6/10/20	30	37

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35

Carolyn D. Onyeka,
v.
Metropolitan Edison
Company
Initial Call-In
Telephonic Hearing

Docket No.: C-2021-3028342

Pages 1 - 83

Judge's Chambers
Keystone Building
400 North Street
Harrisburg, PA 17120

November 17, 2021
Commencing at 10:25 a.m.

INDEX TO EXHIBITS (cont.)

Docket No. C-2021-3028342

Hearing Date: November 17, 2021

<u>NUMBER</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
Respondent Exhibit 4:		
Internal Notification		
dated 11/12/20	31	38
Respondent Exhibit 5:		
Internal Notification		
dated 6/5/21	31	38
Respondent Exhibit 6		
Internal Tele-Memo		
dated 6/5/21	32	38

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32

Carolyn D. Onyeka,
v.
Metropolitan Edison
Company
Initial Call-In
Telephonic Hearing

Docket No.: C-2021-3028342

Pages 1 - 83

Judge's Chambers
Keystone Building
400 North Street
Harrisburg, PA 17120

November 17, 2021
Commencing at 10:25 a.m.

INDEX TO EXHIBITS (cont.)

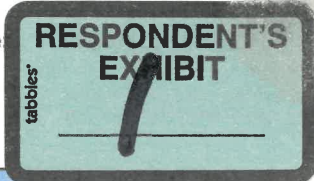
Docket No. C-2021-3028342

Hearing Date: November 17, 2021

<u>NUMBER</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
Respondent Exhibit 7		
Informal Complaint		
with BCS Decision	33	38
Respondent Exhibit 8		
Photos	49	65
Respondent Exhibit 9		
Vegetation Maintenance		
Manual	73	--

Contract Acct: 100040616433
 Service Address: 838 MCKNIGHT ST,READING PA 19601

Date Range



Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
09/07/9999 11:59:10	09/07/2021	100040616433	Tammy J Taylor	PUC/BPU Complaint-Written
<p>Formal PUC complaint docket# C-2021-3028342 received 9/7/21 pertains to removal of hazardous tree. Laurie Parker will handle this complaint. ttaylor Satisfied Not Applicable: Reason - Manual work</p>				
10/07/2021 12:29:00	10/07/2021	100040616433	EAILOGINWM6	Ready Pay Create
No 82610094 - \$ 74.22 - 10/07/2021				
09/29/2021 18:48:18	09/29/2021	100040616433	CS General Purpose Batch	Calculation
<p>C/A 100040616433 Contract 0006257982 Budget amt calculated for period ending 09/28/21 = \$ 75.00 Open editor for detail</p> <p>1. 12 Mth Factor Amt: 871.64 2. Current Delta: 345.46 - 450.00 + 0.00 104.54- 3. Remaining Amount: 526.18 4. Diff + Remain Amt: 104.54- + 526.18 421.64 5. New BBP Amount: 421.64 / 182 x 30.4 70.00 * Dollar Difference: 70.00 - 75.00 5.00 * Pct Difference: 6.67 * System BBP Amount: 75.00</p>				
07/27/2021 06:48:14	07/27/2021	100040616433	Cheryl D Fick	PUC/BPU Complaint-Written
<p>Case #3788993 - VERBAL CLOSE: SPOKE WITH CUSTOMER AND CONFIRMED THE COMPANY WAS ON SITE ON 6/23/2021 AND REMOVED LIMBS THAT WERE NEAR THE POWER LINES. CUSTOMER IS NOT SATISFIED THAT THE COMPANY DID NOT REMOVE THE WHOLE TREE AND MAINTAINS THAT IT IS THE COMPANY'S RESPONSIBILITY TO REMOVE IT BECAUSE THEIR LACK OF MAINTENANCE CAUSED THE TREE TO DIE. INFORMED THE CUSTOMER I COULD NOT DETERMINE RESPONSIBILITY FOR THE DAMAGE TO THE TREE, IF SHE WANTED TO CONTINUE TO PURSUE THAT MATTER SHE WOULD HAVE TO FILE A FORMAL COMPLAINT. CUSTOMER ASKED HOW TO DO SO AND PROVIDED THE PHONE NUMBER AND INFORMATION ON THE PROCESS. EXPLAINED TO THE CUSTOMER THAT THE COMPANY WILL PLACE HER BACK ON PCAP AND SHE DECLINED, STATING SHE WANTED TO WAIT AND SEE WHAT HAPPENED WITH THE TREE AND WOULD LIKE TO REMAIN ON THE TREE PROGRAM FOR NOW. INFORMED CUSTOMER THAT I WOULD RELAY HER DECISION TO THE COMPANY AND WOULD BE CLOSING HER CASE. CUSTOMER UNDERSTOOD AND GAVE PERMISSION TO CLOSE THE CASE. / cdf</p>				
07/06/2021 11:24:41	07/06/2021	100040616433	Kristi C Martin	General Inquiry
<p>Proc update: Since 6/06/2021 the 6mos removal is no longer a requirement. Other rules apply but participation is wholly the option/duty of the ratepayer. Thx Satisfied Not Applicable: Reason - Other - FEP</p>				
06/29/2021 18:41:38	06/29/2021	100040616433	CS General Purpose Batch	Calculation
<p>C/A 100040616433 Contract 0006257982 Budget amt calculated for period ending 06/28/21 = \$ 75.00 Open editor for detail</p> <p>1. 12 Mth Factor Amt: 889.11</p>				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
2. Current Delta: 145.21 - 225.00 + 0.00 79.79- 3. Remaining Amount: 743.90 4. Diff + Remain Amt: 79.79- + 743.90 664.11 5. New BBP Amount: 664.11 / 274 x 30.4 74.00 * Dollar Difference: 74.00 - 75.00 1.00 * Pct Difference: 1.33 * System BBP Amount: 75.00				
06/22/2021 12:02:14	06/22/2021	100040616433	EAILOGINWM6	Outbound Call - Planned Outage
Call Result - SRC_ANS_LIVE OUT-00057340 To our customers along and in the vicinity of the 100 Block of W Windsor St and the 800 Blocks of Weiser and McKnight Sts. If you are receiving this message you will experience an interruption to your electric service on Wed, June 23 from approx 8 AM to 5 PM. This outage is necessary in order for our tree trimming contractor to remove a large tree in your neighborhood that could potentially cause a future unplanned interruption to your electric service.				
05/20/2021 13:13:30	05/20/2021	100040616433	Kristi C Martin	General Inquiry
Rcvd dispute. Dismissed. These are the rules and the customer needs to show that they can pay their regular bills without falling behind and they certainly can be disqualified from financing for other reasons if btwn HSP removal and 6mos if certain criteria are not met. Thanks Satisfied Not Applicable: Reason - Other - FEP				
05/19/2021 14:51:43	05/19/2021	100040616433	Jacqueline L Copeland	PUC/BPU Complaint-Written
PUC case# 3788993 received on 05/19/21 regarding tree trimming. Jackie Copeland				
05/13/2021 03:00:12	05/13/2021	100040616433	CS General Purpose Batch	Sent PCAP Removal Letter
05/12/2021 14:11:53	05/12/2021	100040616433	Natasha M Brady	Removed from Program
per TM customer requested removal for products/services.				
05/09/2021 11:10:15	05/09/2021	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 38.27 Open editor for details. 1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 75.95 x 12 911.40 3. LIHEAP amount: 0.00 4. Unassisted burden: 911.40 - 0.00 911.40 5. Monthly Credit Amt: (911.40 - 452.16) / 12 38.27				
05/06/2021 10:36:29	05/06/2021	100040616433	Workflow General Purpose Batch	Telememo Employee Correspondence
PCAP - Other * 05/06/2021 10:36:22 EST (C68717) when removed from PCAP please continue the tree cutting services and set up the tree plan Created By: GABRIELLA R NIHART				
05/06/2021 10:33:45	05/06/2021	100040616433	Workflow General Purpose Batch	Telememo Employee Correspondence
Remove PCAP * 05/06/2021 10:33:36 EST (C68717) Should an installment plan be set up?: No				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
Number of months: Remove customer from budget billing?: No SW CAROLYN D ONYEKA- needs to be removed from PCAP to set up a tree plan to have a hazardous tree from the property Created By: GABRIELLA R NIHART				
05/06/2021 10:28:22	05/06/2021	100040616433	GABRIELLA R NIHART	General Inquiry
SW CAROLYN D ONYEKA- cust was told in order to set up tree service plan she cannot be on any assistance programs-wants to be removed from PCAP Customer was satisfied.				
05/06/2021 10:19:43	05/06/2021	100040616433	Karen Tait	General Inquiry
SW CAROLYN D ONYEKA / 100040616433 WANTS OFF PCAP... XFR TO CREDIT VAI Satisfied Not Applicable: Reason - Call Transferred				
05/06/2021 10:15:04	05/06/2021	100040616433	INTV IVR	Account Balance Inquiry
04/11/2021 11:08:07	04/11/2021	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 39.20 Open editor for details.				
1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 76.88 x 12 922.56 3. LIHEAP amount: 0.00 4. Unassisted burden: 922.56 - 0.00 922.56 5. Monthly Credit Amt: (922.56 - 452.16) / 12 39.20				
03/30/2021 19:22:53	03/30/2021	100040616433	CS General Purpose Batch	Post PCAP EPP Subsidy True-Up Cr
03/30/2021 19:22:53	03/30/2021	100040616433	CS General Purpose Batch	Calculation
C/A 100040616433 Contract 0006257982 Budget amt calculated for period ending 03/29/21 = \$ 75.00 Open editor for detail				
1. 12 Mth Factor Amt: 905.87 * System BBP Amount: 75.00				
03/26/2021 11:10:35	03/26/2021	100040616433	Kristen L Delle Donne	Outbound Call
PA Outreach to advise that the Company is resuming collection activities after April 1, 2021.				
03/14/2021 11:02:21	03/14/2021	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 38.58 Open editor for details.				
1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 76.26 x 12 915.12 3. LIHEAP amount: 0.00 4. Unassisted burden: 915.12 - 0.00 915.12 5. Monthly Credit Amt: (915.12 - 452.16) / 12 38.58				
03/05/2021 12:49:07	03/05/2021	100040616433	Jameel D Scott	Tree Trimming-Request
Spoke with: CAROLYN D ONYEKA Created By: Jameel D Scott Tree limb on wire/request for tree trimming What is the status of your power?: Power is On				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
<p>Are FirstEnergy wires or poles on the ground?: No Is the inquiry related to transmission?: No Is the limb pushing the wire out of alignment?: No Script read: Yes Customer calling back in regards to a hazard tree. Customer wants someone to come and look at tree again leaves are off the tree customer concerned that tree is top heavy and snow storm will cause tree to put down on line and go into street. Customer wants part of tree hanging over the electrical to be cut. best phone number 484-721-3249 Call anytime Customer was satisfied.</p>				
02/14/2021 10:58:34	02/14/2021	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
<p>C/A 100040616433 A new PCAP amount has been calculated = \$ 35.48 Open editor for details.</p> <p>1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 73.16 x 12 877.92 3. LIHEAP amount: 0.00 4. Unassisted burden: 877.92 - 0.00 877.92 5. Monthly Credit Amt: (877.92 - 452.16) / 12 35.48</p>				
01/10/2021 11:01:58	01/10/2021	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
<p>C/A 100040616433 A new PCAP amount has been calculated = \$ 32.07 Open editor for details.</p> <p>1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 69.75 x 12 837.00 3. LIHEAP amount: 0.00 4. Unassisted burden: 837.00 - 0.00 837.00 5. Monthly Credit Amt: (837.00 - 452.16) / 12 32.07</p>				
12/29/2020 19:17:40	12/29/2020	100040616433	CS General Purpose Batch	Calculation
<p>C/A 100040616433 Contract 0006257982 Budget amt calculated for period ending 12/28/20 = \$ 97.00 Open editor for detail</p> <p>1. 12 Mth Factor Amt: 823.07 2. Current Delta: 648.35 - 531.00 + 0.00 117.35 3. Remaining Amount: 174.72 4. Diff + Remain Amt: 117.35 + 174.72 292.07 5. New BBP Amount: 292.07 / 92 x 30.4 97.00 * Dollar Difference: 97.00 - 73.00 24.00 * Pct Difference: 32.88 * System BBP Amount: 97.00</p>				
12/13/2020 11:14:28	12/13/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
<p>C/A 100040616433 A new PCAP amount has been calculated = \$ 29.28 Open editor for details.</p> <p>1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 66.96 x 12 803.52</p>				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
3. LIHEAP amount: 0.00 4. Unassisted burden: 803.52 - 0.00 803.52 5. Monthly Credit Amt: (803.52 - 452.16) / 12 29.28				
11/24/2020 12:57:54	11/24/2020	100040616433	CS General Purpose Batch	Energy Savings Program Completed
11/17/2020 11:59:36	11/17/2020	100040616433	Kimberleigh R Moran	General Inquiry
s/w CAROLYN D ONYEKA, confirmed already placed tree trimming ticket and provided notification number, adv still showing as pending on system and will contact back within 10 days but she state we put flyer on door and that we would not be able to trim the tree and gave phone # to contact back but not legible, adv since nothing noted on acct as of yet we will not have further info until that is updated in system, if does not hear back from forestry then call back by end of month to see if any updates and go from there Customer was satisfied.				
11/12/2020 13:17:16	11/12/2020	100040616433	Chelsea C Collins	Tree Trimming-Request
Spoke with: CAROLYN D ONYEKA Created By: Chelsea C Collins Tree limb on wire/request for tree trimming What is the status of your power?: Power is On Are FirstEnergy wires or poles on the ground?: No Is the inquiry related to transmission?: No Is the limb pushing the wire out of alignment?: No Script read: Yes Customer calling back in regards to a hazard tree. Customer wants someone to come and look at tree again leaves are off the tree customer concerned that tree is top heavy and snow storm will cause tree to put down on line and go into street. Customer wants part of tree hanging over the electrical to be cut. best phone number 484-721-3249 best time to call in the morning. Customer was satisfied.				
11/08/2020 10:50:20	11/08/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 28.35 Open editor for details. 1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 66.03 x 12 792.36 3. LIHEAP amount: 0.00 4. Unassisted burden: 792.36 - 0.00 792.36 5. Monthly Credit Amt: (792.36 - 452.16) / 12 28.35				
10/16/2020 23:28:35	10/16/2020	100040616433	Tara A Green	Moratorium Protected Account
PA PROTECTED CUSTOMER				
10/11/2020 10:57:19	10/11/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 25.56 Open editor for details. 1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 63.24 x 12 758.88				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
3. LIHEAP amount: 0.00 4. Unassisted burden: 758.88 - 0.00 758.88 5. Monthly Credit Amt: (758.88 - 452.16) / 12 25.56				
09/29/2020 19:21:27	09/29/2020	100040616433	CS General Purpose Batch	Calculation
C/A 100040616433 Contract 0006257982 Budget amt calculated for period ending 09/28/20 = \$ 73.00 Open editor for detail 1. 12 Mth Factor Amt: 746.13 2. Current Delta: 379.69 - 312.00 + 0.00 67.69 3. Remaining Amount: 366.44 4. Diff + Remain Amt: 67.69 + 366.44 434.13 5. New BBP Amount: 434.13 / 182 x 30.4 73.00 * Dollar Difference: 73.00 - 52.00 21.00 * Pct Difference: 40.38 * System BBP Amount: 73.00				
09/13/2020 11:05:45	09/13/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 22.46 Open editor for details. 1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 60.14 x 12 721.68 3. LIHEAP amount: 0.00 4. Unassisted burden: 721.68 - 0.00 721.68 5. Monthly Credit Amt: (721.68 - 452.16) / 12 22.46				
08/09/2020 10:59:38	08/09/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 20.29 Open editor for details. 1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 57.97 x 12 695.64 3. LIHEAP amount: 0.00 4. Unassisted burden: 695.64 - 0.00 695.64 5. Monthly Credit Amt: (695.64 - 452.16) / 12 20.29				
07/12/2020 11:19:33	07/12/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 18.74 Open editor for details. 1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 56.42 x 12 677.04 3. LIHEAP amount: 0.00 4. Unassisted burden: 677.04 - 0.00 677.04 5. Monthly Credit Amt: (677.04 - 452.16) / 12 18.74				
07/02/2020 15:40:20	07/02/2020	100040616433	Maureen N Salerno	General Inquiry
SW CAROLYN D ONYEKA 000346080021 notif. # 6/10 tree guy cant work over hot wire so called in to us lines in				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
				<p>tree, tree split, 6/10. says forestry came out to assess but not telling her any info. said noone talked to her since coming out didnt tell her plan, she wants communication. i adv if they assessed they may take 30days to do work, no notes, xfer met ed forestry: 610-473-1123 adv 34.19 due 7/21 Customer was satisfied. the tree work requires an outage with line department-as per noted on notification;7/6 I forwarded vm to forester, Rick Lamoreaux, to contact customer with results of tree inquiry. mhoffman</p>
06/29/2020 19:08:28	06/29/2020	100040616433	CS General Purpose Batch	Calculation
				<p>C/A 100040616433 Contract 0006257982 Budget amt calculated for period ending 06/28/20 = \$ 52.00 Open editor for detail</p> <p>1. 12 Mth Factor Amt: 669.21 2. Current Delta: 161.97 - 156.00 + 0.00 5.97 3. Remaining Amount: 507.24 4. Diff + Remain Amt: 5.97 + 507.24 513.21 5. New BBP Amount: 513.21 / 276 x 30.4 57.00 * Dollar Difference: 57.00 - 52.00 5.00 * Pct Difference: 9.62 * System BBP Amount: 52.00</p>
06/14/2020 10:53:07	06/14/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
				<p>C/A 100040616433 A new PCAP amount has been calculated = \$ 17.50 Open editor for details.</p> <p>1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 55.18 x 12 662.16 3. LIHEAP amount: 0.00 4. Unassisted burden: 662.16 - 0.00 662.16 5. Monthly Credit Amt: (662.16 - 452.16) / 12 17.50</p>
06/10/2020 12:20:52	06/10/2020	100040616433	Khareem A Cunningham	Tree Trimming-Request
				<p>Spoke with: CAROLYN D ONYEKA Created By: Khareem A Cunningham Tree limb on wire/request for tree trimming What is the status of your power?: Power is On Are FirstEnergy wires or poles on the ground?: No Is the inquiry related to transmission?: No Is the limb pushing the wire out of alignment?: No Script read: Yes s/w CAROLYN D ONYEKA behind the house near the garage tree is split in the middle (484)721-3249 can call anytime</p>

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
Customer was satisfied.				
05/10/2020 10:40:34	05/10/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 18.74 Open editor for details. 1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 56.42 x 12 677.04 3. LIHEAP amount: 0.00 4. Unassisted burden: 677.04 - 0.00 677.04 5. Monthly Credit Amt: (677.04 - 452.16) / 12 18.74				
05/04/2020 08:40:40	05/04/2020	100040616433	CS General Purpose Batch	Job assigned to Energy Savings contractor
04/12/2020 10:39:34	04/12/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 15.64 Open editor for details. 1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 53.32 x 12 639.84 3. LIHEAP amount: 0.00 4. Unassisted burden: 639.84 - 0.00 639.84 5. Monthly Credit Amt: (639.84 - 452.16) / 12 15.64				
03/30/2020 19:09:22	03/30/2020	100040616433	CS General Purpose Batch	Calculation
C/A 100040616433 Contract 0006257982 Budget amt calculated for period ending 03/29/20 = \$ 52.00 Open editor for detail 1. 12 Mth Factor Amt: 630.95 * System BBP Amount: 52.00				
03/08/2020 10:37:56	03/08/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 14.71 Open editor for details. 1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 52.39 x 12 628.68 3. LIHEAP amount: 0.00 4. Unassisted burden: 628.68 - 0.00 628.68 5. Monthly Credit Amt: (628.68 - 452.16) / 12 14.71				
03/04/2020 14:15:55	03/04/2020	100040616433	B2BEALOGIN	Real Time Payment Pending
Payment Date: 03/04/2020 Payment Time: 14:15:53 Payment Amount: 73.00 Payment Type: Cash Vendor ID: AP Receipt Number: PA0269091520065				
02/24/2020 03:16:03	02/24/2020	100040616433	CS General Purpose Batch	Sent PCAP Bene End Date Conv Ltr
02/23/2020 03:47:40	02/23/2020		CS General Purpose Batch	Bene End Date Conv
02/09/2020 10:34:53	02/09/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 15.95 Open editor for details.				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 53.63 x 12 643.56 3. LIHEAP amount: 0.00 4. Unassisted burden: 643.56 - 0.00 643.56 5. Monthly Credit Amt: (643.56 - 452.16) / 12 15.95				
01/21/2020 13:43:21	01/21/2020	100040616433	B2BEALOGIN	Real Time Payment Pending
Payment Date: 01/21/2020 Payment Time: 13:43:20 Payment Amount: 38.00 Payment Type: Cash Vendor ID: AP Receipt Number: PA0269091090057				
01/12/2020 10:35:55	01/12/2020	100040616433	CS General Purpose Batch	Recalc of Monthly PCAP Credit
C/A 100040616433 A new PCAP amount has been calculated = \$ 18.43 Open editor for details. 1. Minimum Payment: 15072.00 * 3.00 % 452.16 2. Current burden: 56.11 x 12 673.32 3. LIHEAP amount: 0.00 4. Unassisted burden: 673.32 - 0.00 673.32 5. Monthly Credit Amt: (673.32 - 452.16) / 12 18.43				



DETAILED STATEMENT OF ACCOUNT

Customer Name: CAROLYN D ONYEKA

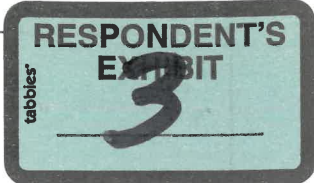
Account Number: 100040616433

Service Address:
838 MCKNIGHT ST
READING PA 19601

Entry Date	Read Date	Cons Type	Meter Reading	Cons Usage	Nbr Days	Daily Average	Read Type	FE Billing Amt	Supplier Billing Amt	Total Billing Amt	Budget Billing Amt	Due Date	Payment Amt	Adj Amt	Adj Type	Account Balance
11/12/19													-40.00			160.02
11/30/19	11/28/19	KWH	4,480	657	30	22	Act	82.70		82.70	48.00	12/23/19				242.72
11/30/19														-12.06	CAPFA	230.66
11/30/19														-10.06	CAPB	220.60
12/10/19													-38.00			182.60
12/30/19	12/28/19	KWH	4,970	490	30	16	Act	67.96		67.96	48.00	01/21/20				250.56
12/30/19														-10.06	CAPB	240.50
12/30/19														-12.06	CAPFA	228.44
01/21/20													-38.00			190.44
01/29/20	01/27/20	KWH	5,258	288	30	10	Act	44.37		44.37	89.00	02/20/20				234.81
01/29/20														-18.43	CAPB	216.38
01/29/20														-12.06	CAPFA	204.32
02/10/20													-70.00			134.32
02/27/20	02/26/20	KWH	5,694	436	30	15	Act	62.13		62.13	89.00	03/23/20				196.45
02/27/20														-12.06	CAPFA	184.39
02/27/20														-15.95	CAPB	168.44
03/04/20													-73.00			95.44
03/30/20	03/29/20	KWH	6,226	532	32	17	Act	68.22		68.22	89.00	04/21/20				163.66
03/30/20														-14.71	CAPB	148.95
03/30/20														-12.06	CAPFA	136.89
04/29/20	04/28/20	KWH	6,725	499	30	17	Act	64.28		64.28	52.00	05/21/20				201.17
04/29/20														-15.64	CAPB	185.53
04/29/20														-12.06	CAPFA	173.47
05/30/20	05/28/20	KWH	7,038	313	30	10	Act	44.03		44.03	52.00	06/22/20				217.50
05/30/20														-18.74	CAPB	198.76
05/30/20														-12.06	CAPFA	186.70
06/15/20													-26.00			160.70
06/29/20	06/28/20	KWH	7,447	409	31	13	Act	53.66		53.66	52.00	07/21/20				214.36
06/29/20														-17.50	CAPB	196.86

Entry Date	Read Date	Cons Type	Meter Reading	Cons Usage	Nbr Days	Daily Average	Read Type	FE Billing Amt	Supplier Billing Amt	Total Billing Amt	Budget Billing Amt	Due Date	Payment Amt	Adj Amt	Adj Type	Account Balance
06/29/20																184.80
07/14/20													-35.00			149.80
07/29/20	07/28/20	KWH	8,020	573	30	19	Act	71.15		71.15	52.00	08/20/20				220.95
07/29/20																202.21
07/29/20																190.15
08/10/20													-35.00			155.15
08/29/20	08/27/20	KWH	8,609	589	30	20	Act	72.88		72.88	52.00	09/21/20				228.03
08/29/20																207.74
08/29/20																195.68
09/14/20													-30.00			165.68
09/29/20	09/28/20	KWH	9,187	578	32	18	Act	73.69		73.69	52.00	10/21/20				239.37
09/29/20																227.31
09/29/20																204.85
10/13/20													-30.00			174.85
10/28/20	10/27/20	KWH	9,715	528	29	18	Act	68.64		68.64	73.00	11/19/20				243.49
10/28/20																217.93
10/28/20																205.87
11/16/20													-50.00			155.87
11/28/20	11/26/20	KWH	10,471	756	30	25	Act	93.93		93.93	73.00	12/21/20				249.80
11/28/20																237.74
11/28/20																209.39
12/29/20	12/28/20	KWH	11,309	838	32	26	Act	106.09		106.09	73.00	01/20/21				315.48
12/29/20																286.20
01/14/21													-50.00			236.20
01/19/21													-85.00			151.20
01/27/21	01/26/21	KWH	11,967	658	29	23	Act	84.22		84.22	97.00	02/18/21				235.42
01/27/21																211.30
01/27/21																179.23
02/25/21													-15.00			164.23
02/27/21																128.75
02/27/21																116.69
02/27/21	02/25/21	KWH	12,741	774	30	26	Act	97.42		97.42	97.00	03/22/21				214.11
03/15/21													-61.00			153.11
03/30/21	03/29/21	KWH	13,364	623	32	19	Act	75.88		75.88	97.00	04/21/21				228.99
03/30/21																190.41
03/30/21																106.54
03/30/21																94.48
04/16/21													-60.00			34.48
04/28/21	04/27/21	KWH	13,767	403	29	14	Act	51.94		51.94	75.00	05/20/21				86.42
04/28/21																74.36
04/28/21																35.16
05/14/21													-35.00			0.16

Entry Date	Read Date	Cons Type	Meter Reading	Cons Usage	Nbr Days	Daily Average	Read Type	FE Billing Amt	Supplier Billing Amt	Total Billing Amt	Budget Billing Amt	Due Date	Payment Amt	Adj Amt	Adj Type	Account Balance
05/29/21	05/27/21	KWH	14,075	308	30	10	Act	41.80		41.80	75.00	06/21/21				41.96
06/21/21													-100.00			-58.04
06/29/21	06/28/21	KWH	14,432	357	32	11	Act	51.47		51.47	75.00	07/21/21				-6.57
07/19/21													-75.00			-81.57
07/29/21	07/28/21	KWH	14,971	539	30	18	Act	73.90		73.90	75.00	08/23/21				-7.67
08/13/21													-75.00			-82.67
08/30/21	08/29/21	KWH	15,519	548	32	17	Act	74.99		74.99	75.00	09/21/21				-7.68
09/14/21													-74.00			-81.68
09/29/21	09/28/21	KWH	15,860	341	30	11	Act	51.36		51.36	75.00	10/21/21				-30.32
10/07/21													-74.22			-104.54
10/28/21	10/27/21	KWH	16,173	313	29	11	Act	48.34		48.34	75.00	11/22/21				-56.20



GENERAL NOTIFICATION

WORK TYPE: Tree Trimming - Inquiry

Notification: 346080021 Type: GN
CREWS Work Request No.: 60734212

Order:
Crew Code:

Short Text: FORI Tree Trimming - Inquiry
Required Start: 06/10/2020 @ 12:20:52

Reported by: CAROLYN D ONYEKA

Phone: (484)721-3249

BUSINESS PARTNER

Business Partner No.: 800742096
CAROLYN D ONYEKA
838 MCKNIGHT ST
READING PA 19601

Contract Acct. No.: 100040616433
Phone: (484)721-3249

PREMISE INFORMATION

Premise No.: 2048036
838 MCKNIGHT ST
READING PA 19601

Phone: (484)721-3249

TECHNICAL INFORMATION

Pole Key:
Circuit: 00154-1
Substation: SCHUYLKILL AVENUE
Maintenance Group: 201 (Reading)
Tax District: 00000494
Tax Location: READING - PA
Tax County: BERKS

Meter: 5001970107 1 Phase

Main Wrk Ctr: PELRD

Long Text: Special Instructions: Dog

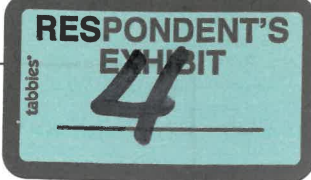
- * * 06/27/2020 23:15:36 EST ZEDBTCH (ZEDBTCH)
- * 06/10/2020 23:16:58 EST ZEDBTCH (ZEDBTCH)
- * 06/10/2020 12:20:52 EST Khareem A Cunningham (56694)
- * Tree limb on wire/request for tree trimming
- * s/w CAROLYN D ONYEKA behind the house near the garage tree is split in
- * the middle (484)721-3249 can call anytime
- * 06/11/2020 19:39:12 EST Troy M Norris (57287)
- * s/w Bo Irwin-Arborist who said tree is dangerous phone # 6106036701

Comments:

Work Complete: _____ / _____
(Malfunc. End) Date / Time

Name (Please Print)

Complete in: PRD(010)



GENERAL NOTIFICATION

WORK TYPE: Tree Trimming - Inquiry

Notification: 347628614 Type: GN
CREWS Work Request No.: 61025591

Order:
Crew Code:

Short Text: FORI Tree Trimming - Inquiry
Required Start: 11/12/2020 @ 13:17:16

Reported by: CAROLYN D ONYEKA

Phone: (484)721-3249

BUSINESS PARTNER

Business Partner No.: 800742096
CAROLYN D ONYEKA
838 MCKNIGHT ST
READING PA 19601

Contract Acct. No.: 100040616433
Phone: (484)721-3249

PREMISE INFORMATION

Premise No.: 2048036
838 MCKNIGHT ST
READING PA 19601

Phone: (484)721-3249

TECHNICAL INFORMATION

Pole Key:
Circuit: 00154-1
Substation: SCHUYLKILL AVENUE
Maintenance Group: 201 (Reading)
Tax District: 00000494
Tax Location: READING - PA
Tax County: BERKS

Meter: 5001970107 1 Phase

Main Wrk Ctr: PELRD

Long Text: Special Instructions: Dog
* * 11/22/2020 23:15:30 EST ZEDBTCH (ZEDBTCH)
* 11/12/2020 23:16:38 EST ZEDBTCH (ZEDBTCH)
* 11/12/2020 13:17:16 EST C. Collins (56696) Phone (304)367-3366 320-6037
* Tree limb on wire/request for tree trimming
* Customer calling back in regards to a hazard tree. Customer wants
* someone to come and look at tree again leaves are off the tree
* customer concerned that tree is top heavy and snow storm will cause tree
* to put down on line and go into street.

Comments:

Work Complete: _____ / _____
(Malfunct. End) Date / Time

Name (Please Print)

Complete in: PRD(010)



TELEMEMO NOTIFICATION

Notification: 348630823

Type: TM

Short Text: Remove PCAP

Required Start: 05/06/2021 @ 10:33:36

Required End: 06/05/2021 @ 00:00:00

Initiator: HUMSERVPCAP

BUSINESS PARTNER INFORMATION:

Business Partner No.: 800742096
CAROLYN D ONYEKA
838 MCKNIGHT ST
READING PA 19601
(484)721-3249

Contract Acct. No.: 100040616433

Long Text: Remove PCAP

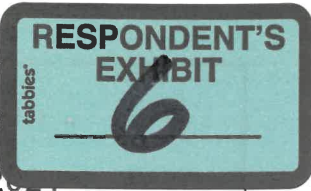
- * Remove PCAP
- * * 05/06/2021 10:33:36 EST (C68717)
- * Should an installment plan be set up?: No
- * Number of months:
- * Remove customer from budget billing?: No
- * SW CAROLYN D ONYEKA- needs to be removed from PCAP to set up a tree plan to have a hazardous tree from the property
- * 05/12/2021 14:12:21 EST (50403) Phone (681)753-5530 333-5530
- * duplicate TM - closing.

Comments:

Complete in: PRD(010)

Name (Please Print)

Please complete via the Integrated Inbox or the Active Workflows process (AWF).



TELEMEMO NOTIFICATION

Notification: 348630826 Type: IM

Short Text: FCR PCAP - Other

Required Start: 05/06/2021 @ 10:36:22
Required End: 06/05/2021 @ 00:00:00

Initiator: FECCREFERRAL

BUSINESS PARTNER INFORMATION:

Business Partner No.: 800742096
CAROLYN D ONYEKA
838 MCKNIGHT ST
READING PA 19601
(484)721-3249

Contract Acct. No.: 100040616433

Long Text: FCR PCAP - Other
* PCAP - Other
* * 05/06/2021 10:36:22 EST (C68717)
* when removed from PCAP please continue the tree cutting services and set up the tree plan
* 05/12/2021 14:13:24 EST (50403) Phone (681)753-5530 333-5530
* PCAP has been removed as requested - HS does not enroll customers into products/services. The customer can be called back to advise that they can call for their product/service at this time. However, per notes on the tree trimming inquiry from 03/05 - the customer is just requesting limbs to be trimmed, so unsure if this is what the customer truly wanted. Please review with customer. Thanks

Comments:

Complete in: PRD(010)

Name (Please Print)

Please complete via the Integrated Inbox or the Active Workflows process (AWF).



Assigned To

Assigned Specialist
Copeland, Jacqueline L
Customer Information

Case Number

3788993

Account Number

100040616433

First Name

CAROLYN

Last Name

ONYEKA

Service Address

Address1

838 MCKNIGHT ST

Address2

Service City

READING

Service State

PA

Service Zip

19601-0

Service Class

Work Phone

Home Phone

Mailing Address

Address1

Address2

City

State

Mail Zip

Family

Family Size

0

Children

0

Age

Adults

0

General

PUC Date Opened

5/19/2021

PUC Date Prepared

5/19/2021

Received Date

5/19/2021

PUC Date Closed

7/26/2021

Case Information

Prior Case Number

0

Term Date

Arrearage

0

Case Origin

Universal Service

Income

TELEPHONE

No

Source

Business Name

Reason For Contact

SERVICE (CO. FACILITIES) (# 48)

Case Problem

CUSTOMER WAS REMOVED FROM PCAP PROGRAM TO BE PLACED ON THE TREE PROGRAM. CUSTOMER IS DISPUTING COMPANY MAKING HER WAIT 6 MONTHS FOR PROGRAM TO COME AND ADDRESS THE TREE THAT IS SPLITTING ON HER PROPERTY. CUSTOMER SAYS TREE IS SPLITTING BECAUSE IT IS TOO HEAVY ON THE SIDE THAT HAS THE ELECTRICAL WIRES THAT COMPANY HAS NEVER ADDRESSED OR MAINTAINED IN THE 20 YEARS SHE HAS LIVED THERE. THE CELL PHONE NUMBER (484) 721 - 3249 HAS BEEN ALLOWED TO BE SHARED. THE EMAIL ADDRESS CAROLYNONYEKA@GMAIL.COM HAS BEEN ALLOWED TO BE SHARED.

Company Position

05/19/2021 MUST WAIT 6 MONTHS

Related Information

Misc. Info.

Hot Issue

PUC Investigator / Intaker

Investigator First Name	Investigator Last Name	Investigator Phone
BCS	CASE POOL	(717)
Intaker First Name	Intaker Last Name	
DORIN	COLLINS	
Status		

Status

Closed

History

Click To Expand

◀▶

Is Archived

Customer Information

Case Number

3788993

Customer First Name

CAROLYN

Customer Last Name

ONYEKA

Account Number

100040616433

Service Address

Address 1

838 MCKNIGHT ST

Address 2

City

READING

Service State

PA

Zip

19601

Home Phone

Work Phone

Mailing Address

Address 1

Address 2

City

State

Zip

Family

Adults

0

Family Size

0

Children

0

Age

General

PUC Date Opened

5/19/2021

PUC Sent Date

7/26/2021

PUC Date Closed

7/26/2021

Case Type

Pa-Informal

Assigned To

Assigned Specialist

Copeland, Jacqueline L

Case Information

PUC Violation

NO

PUC Chapter

Section Rule

Balance Date

6/8/2021

Head Date

6/21/2021

Bill Date	PUC Service Continue Date	
Total Balance	PUC Service Restored Pay	PUC Special Budget Amount
98.22	0.00	0.00
Regular Budget Amount	PUC Service Continue Amount	Arrears Payment Plus
75.00	0.00	0.00
Final Monthly Payment	Current Monthly Payment	End Monthly Payment
0.00	0.00	0.00
Reconnect Amount	Pay Amount	
0.00	0.00	

PUC Terms

Letter Description

SHORT BLANK LETTER

Resolution

VERBAL CLOSE: SPOKE WITH CUSTOMER AND CONFIRMED THE COMPANY WAS ON SITE ON 6/23/2021 AND REMOVED LIMBS THAT WERE NEAR THE POWER LINES. CUSTOMER IS NOT SATISFIED THAT THE COMPANY DID NOT REMOVE THE WHOLE TREE AND MAINTAINS THAT IT IS THE COMPANY'S RESPONSIBILITY TO REMOVE IT BECAUSE THEIR LACK OF MAINTENANCE CAUSED THE TREE TO DIE. INFORMED THE CUSTOMER I COULD NOT DETERMINE RESPONSIBILITY FOR THE DAMAGE TO THE TREE, IF SHE WANTED TO CONTINUE TO PURSUE THAT MATTER SHE WOULD HAVE TO FILE A FORMAL COMPLAINT. CUSTOMER ASKED HOW TO DO SO AND PROVIDED THE PHONE NUMBER AND INFORMATION ON THE PROCESS. EXPLAINED TO THE CUSTOMER THAT THE COMPANY WILL PLACE HER BACK ON PCAP AND SHE DECLINED, STATING SHE WANTED TO WAIT AND SEE WHAT HAPPENED WITH THE TREE AND WOULD LIKE TO REMAIN ON THE TREE PROGRAM FOR NOW. INFORMED CUSTOMER THAT I WOULD RELAY HER DECISION TO THE COMPANY AND WOULD BE CLOSING HER CASE. CUSTOMER UNDERSTOOD AND GAVE PERMISSION TO CLOSE THE CASE.

Has Decision Issue Response Time

Other Information

Investigator First Name Investigator Last Name

BRANDI BARRICK

Investigator Area Code Investigator Phone

717

Investigator Fax Area Code Investigator Fax

Intaker First Name Intaker Last Name

DORIN COLLINS

Status

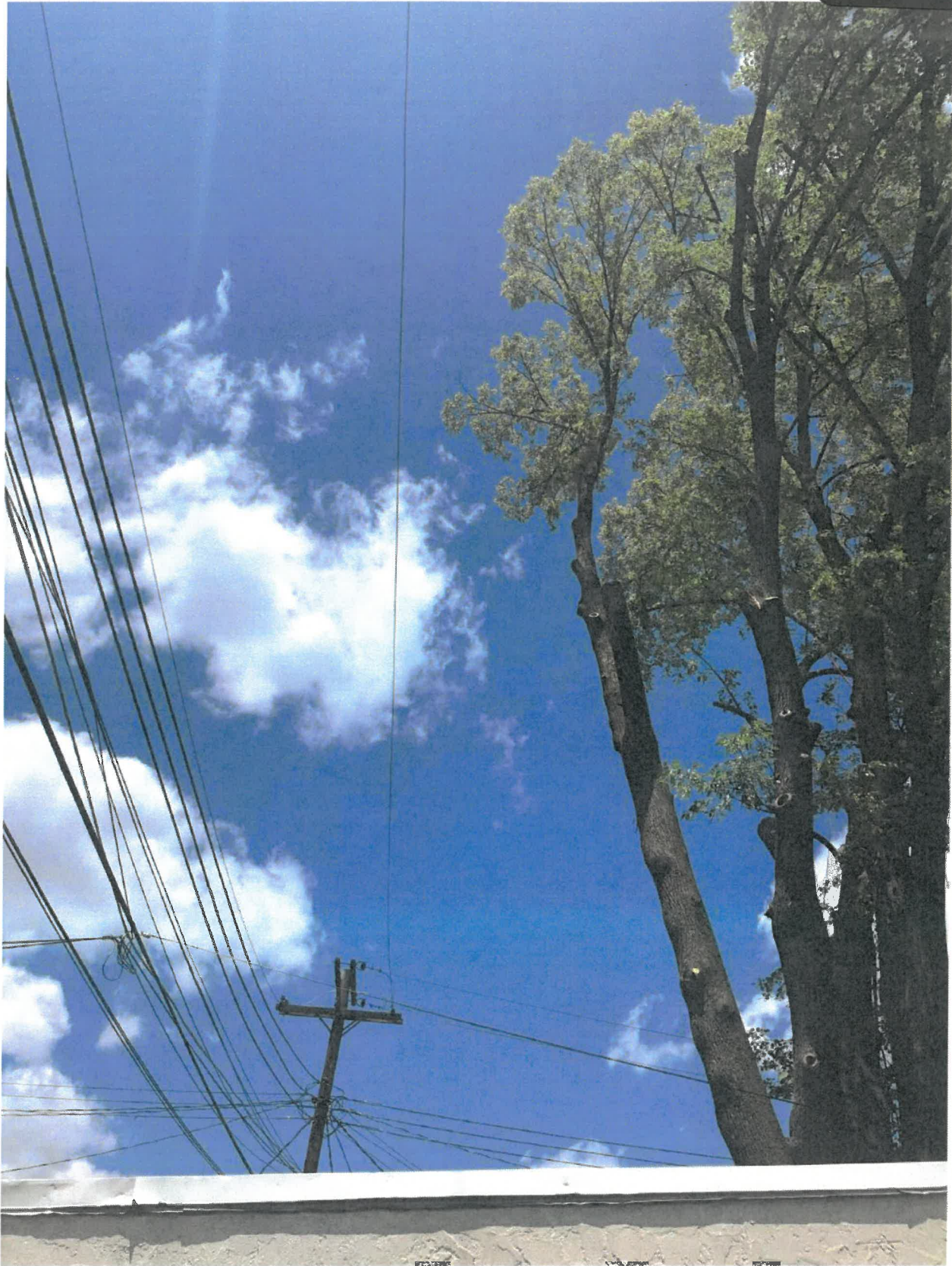
Is SAP Completed SAP Completion Date

 7/27/2021

History

Click To Expand









COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120



IN REPLY PLEASE
REFER TO OUR FILE

January 15, 2020

Docket No. M-2009-2094773

SCOTT R. WYMAN
FIRST ENERGY CORPORATION
800 CABIN HILL DRIVE
GREENSBURG PA 15601

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

Dear Mr. Wyman:

On October 1, 2019, Metropolitan Edison Company (“Met-Ed”) filed its Biennial Inspection, Maintenance, Repair and Replacement Plan (“Plan”), pursuant to 52 Pa. Code § 57.198(a), to be made effective on January 1, 2021.

The Commission’s regulations require EDCs to file, every two years by October 1, a biennial plan for the periodic inspection, maintenance, repair and replacement of facilities that is designed to meet reliability performance benchmarks and standards set forth in 52 Pa. Code §§ 57.191-57.197. The Commission’s Implementation Order, entered August 13, 2009, identified Met-Ed as one of five EDCs in Compliance Group 1 which must file their sixth biennial Plan by October 1, 2019. The Plan must cover the two calendar years beginning 15 months after filing and remain in effect for two calendar years thereafter (January 1, 2021 through December 31, 2022).

Met-Ed I&M Plan for 2021 and 2022 is consistent with its previously approved plan for 2019 through 2020 and proposes no substantive changes.

Plan Consistency

52 Pa. Code § 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 provisions of the American National Standards Institute, Inc.

Met-Ed’s Plan states it complies with 52 Pa. Code § 57.198(b) requirements.

Time Frames

52. Pa. Code § 57.198(c) Time frames. The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection

(n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will still support the level of reliability required by law.

Met-Ed continues previously approved modifications, discussed *infra*, for the following programs, or parts of programs:

- Pole inspections
- Distribution overhead line inspection interval
- Distribution overhead transformer inspection interval

Record Keeping

52 Pa. Code § 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.*

Met-Ed's Plan states it complies with 52 Pa. Code § 57.198(m) requirement.

Vegetation Management

52 Pa. Code § 57.198(n)(1) Vegetation management. The Statewide minimum inspection and treatment cycle for vegetation management is between 4-8 years for distribution facilities. An EDC shall submit a condition-based plan for vegetation management for its distribution system facilities explaining its treatment cycle.

The Plan includes three vegetation management methods for promoting safe and reliable operation of their distribution system. The first method is the Standard Specification, which provides vegetation to be pruned to achieve a five (5) year cycle for clearance. This includes: removal of selected incompatible trees within the clearing zone corridor; removal of certain defective limbs that are overhanging primary conductors; controlling selected incompatible brush mechanically and/or using herbicide; and removal of off-corridor priority trees that are dead, dying, diseased, and leaning or significantly encroaching the corridor. The Standard Specification is used on portions of circuits that experience high customer interruption minutes due to vegetation-caused outages.

Met-Ed utilizes the second method, Enhanced Specification, on targeted circuit locations that experience high customer interruption minutes due to vegetation-caused outages. The Enhanced Specification includes the methods from the Standard Specification plus the removal of certain healthy limbs that overhang primary conductors.

Met-Ed utilizes the third method, Inspect/Maintain, for portions of circuits that have not experienced significant reliability issues due to vegetation-caused outages. The process involves inspection of vegetation around the circuits and removal of vegetation that has the potential for interference with conductors. The Inspect/Maintain process targets selective vegetation removal on a cycle which will not exceed eight (8) years.

This Plan generally complies with section 57.198(n)(1).

Pole Inspections

52 Pa. Code § 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 inspections 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.*

The Plan states that Met-Ed will visually inspect distribution wood poles on a 12-year cycle. The preventative maintenance inspection for wood poles will include a visual inspection as well as hammer-sounding as needed. The inspection consists of the recording of abnormal conditions from the groundline to the top of the pole, including damage (broken or leaning), equipment (crossarms, insulators, conductors, oil leaking), and testing for decayed internal wood. Poles showing incipient decay or poles that are 35 years old or older will be bored to further assess the condition of the pole.

Met-Ed included a previously approved exemption from performing pole load calculations as part of pole inspections.

The Plan generally complies with Section 57.198(n)(2).

Pole Inspection Failure

52 Pa. Code § 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.

The Plan states that wood poles and supporting structures with recorded defects that Met-Ed could reasonably expect to endanger life or property will be repaired or replaced within 30 days. All remaining deficiencies will be evaluated and prioritized on a case-by-case basis.

The Plan generally complies with Section 57.198(n)(3).

Distribution Overhead Line Inspections

52 Pa. Code § 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 transformer.*
- (iii) Other conditions that may adversely affect operation of the overhead distribution line.*

Met-Ed's Plan includes a previously approved exemption for a five (5) year inspection cycle, rather than the required one to two (1-2) year cycle. During this inspection cycle, Met-Ed has added switches and sectionalizers to their overhead line inspection plan, which is an addition from its previously approved plan.

The Plan generally complies with section 57.198(n)(4).

Inspection Failure

52 Pa. Code § 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.

The Plan states that supporting structures with recorded defects that Met-Ed could reasonably expect to affect the integrity of the circuit shall be repaired/replaced within 30 days. All remaining deficiencies will be evaluated and prioritized on a case-by-case basis.

The Plan generally complies with Section 57.198(n)(5).

Distribution Transformer Inspections

52 Pa. Code § 57.198(n)(6) Distribution transformer inspection. 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) *Installation 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.*

Met-Ed's Plan includes a previously approved exemption for a five (5) year inspection cycle for overhead transformers, consistent with their overhead line inspection cycle, instead of the required one to two (1-2) year cycle. Met-Ed will inspect above-ground pad-mounted transformers on a five (5) year cycle and below-ground transformers on an eight (8) year cycle.

The Plan generally complies with section 57.198(n)(6).

Recloser Inspections

52 Pa. Code § 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.

The Plan states that Met-Ed visually inspects distribution line reclosers annually and this practice is the same for all FirstEnergy companies.

The Plan generally complies with section 57.198(n)(7).

Substation Inspections

52 Pa. Code § 57.198(n)(8) Substation inspections. Substation equipment, structures and hardware shall be inspected on a cycle of 5 weeks or less.

Met-Ed's Plan includes inspections on monthly, quarterly, and biannual intervals. Safety and security inspections are conducted monthly; readings of currents, etc. are performed quarterly; and a more comprehensive inspection of substation equipment are performed biannually. This Plan is consistent with all FirstEnergy companies.

The Plan generally complies with section 57.198(n)(8).

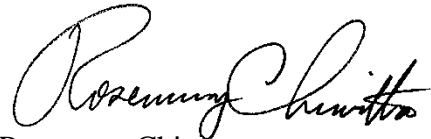
Conclusion

Upon review of Met-Ed's Biennial Inspection, Maintenance, Repair and Replacement Plan filed on October 1, 2019; it appears that the filing generally complies to the requirements of 52 Pa. Code § 57.198. Furthermore, as discussed *supra*, the previously approved exemptions requested by Met-Ed may continue. These approvals are contingent upon the possibility that subsequent audits, reviews and inquiries, in any Commission proceeding, may be conducted pursuant to 52 Pa. Code § 57.197(a).

This plan must remain in effect for two calendar years, beginning January 1, 2021 through December 31, 2022. Met-Ed may however, request Commission approval of subsequent revisions to its approved Plan, in accordance with 52 Pa. Code § 57.198(1). Revisions must be submitted to the Commission as an addendum to Met-Ed's quarterly reliability report filed pursuant to § 57.195, including prospective and past revisions to its Plan and a justification for the revisions.

If you are dissatisfied with the resolution of this matter, you may, as set forth in 52 Pa. Code § 5.44, file a petition with the Commission within twenty (20) days after the date of this letter. Please direct any questions regarding this filing to David Washko, Electrical Reliability Engineer, Bureau of Technical Utility Services at (717) 425-7401, or dawashko@pa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is fluid and cursive, with the first name being the most prominent.

Rosemary Chiavetta
Secretary

cc: Robert Young, Law Bureau
John Van Zant, TUS
Dan Searfoorce, TUS
David Washko, TUS

Teresa K. Harrold, Esq.
(610) 921-6783
(330) 315-9263 (Fax)

M-2009-2094773

October 1, 2019

VIA UPS OVERNIGHT DELIVERY

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

RECEIVED
OCT - 1 2019
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Biennial Inspection, Maintenance, Repair and Replacement Plan –
Metropolitan Edison Company for the period January 1, 2021 –
December 31, 2022
Docket No.**

Dear Secretary Chiavetta:

In accordance with 52 Pa. Code § 57.198, enclosed for filing on behalf of Metropolitan Edison Company (“Met-Ed”) is an original and one copy of the Biennial Inspection, Maintenance, Repair and Replacement Plan (the “Plan”) for the period January 1, 2021 through December 31, 2022. Please date stamp the extra copy and return it in the postage-prepaid envelope provided.

This Plan is designed consistent with the guidelines established by the National Electric Safety Code, the Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission Regulations, and the American National Standards Institute, Inc. The Plan also has been designed to reduce the risk of outages on Met-Ed’s system and form the basis of its inspection and maintenance goals and objectives as outlined in Met-Ed’s annual and quarterly reliability reports filed with the Pennsylvania Public Utility Commission (“Commission”).

Met-Ed respectfully requests that the Commission accept its Biennial Inspection, Maintenance, Repair and Replacement Plan. If you have any questions, please contact me or Laurel Klingensmith at (330) 374-6672.

Very truly yours,


Teresa K. Harrold

kbw
Enclosure

c: D. Searforce

**Biennial Inspection, Maintenance, Repair and
Replacement Plan for Metropolitan Edison Company**

For the period of January 1, 2021 – December 31, 2022

RECEIVED

OCT -1 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Submitted by:
Scott R. Wyman
President, Pennsylvania Operations
800 Cabin Hill Drive
Greensburg, PA 15601
Email: wymans@firstenergycorp.com**

Table of Contents

Introduction..... 4

System Assessment..... 4

Plan Revisions..... 5

Plan Consistency..... 5

Record Keeping 5

Vegetation Management 6

 Program Description 6

 Program Justification 7

 Inspection Plan..... 8

Distribution Pole Inspections..... 9

 Program Description 9

 Corrective Maintenance 10

 Program Justification 10

 Inspection Plan..... 11

Distribution Overhead Line Inspections 13

 Program Description 13

 Corrective Maintenance 14

 Program Justification 14

 Inspection Plan..... 15

Distribution Transformer Inspections 16

 Program Description 16

 Program Justification 17

 Inspection Plan..... 17

Recloser Inspections 20

 Program Description 20

 Program Justification 20

 Inspection Plan..... 21

Substation Inspections 24

 Program Description 24

 Program Justification 26

 Inspection Plan..... 26

RECEIVED
OCT - 1 2019
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

This page intentionally left blank.

Introduction

Pursuant to 52 Pa. Code § 57.198(a), every two years an electric distribution company shall file with the Pennsylvania Public Utility Commission (“Commission”) a biennial plan for the periodic inspection, maintenance, repair and replacement of its facilities. Metropolitan Edison Company (“Met-Ed” or “Company”) hereby submits its Biennial Inspection, Maintenance, Repair and Replacement Plan (“I&M Plan”) for the period January 1, 2021 through December 31, 2022 in accordance with the relevant parts of 52 Pa. Code § 57.198.

System Assessment

Met-Ed serves more than 565,000 Pennsylvania customers and the service territory covers more than 3,000 square miles. From the physical field employees up to and including top management, Met-Ed is 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 Company’s respective reliability metrics. In addition to the I&M Plan, Met-Ed utilizes core programs to support cost-effective and reliable service. These programs include, but are not limited to:

- **Vegetation Management**
 - 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 vegetation circuit patrols target the areas with high tree-related outages. These patrols identify trees damaged in a storm that may eventually lead to a future outage. Once identified, the tree is removed. In addition, damaged equipment identified as a part of the 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”)**

- Met-Ed first began to execute its LTIIP 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 Company filed its second LTIIP covering the period 2020 through 2024.

Plan Revisions

Met-Ed submitted its I&M 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).

Met-Ed's proposed I&M Plan for 2021 and 2022 is consistent with its previously approved plan for 2019 and 2020 and proposes no substantive changes to its inspection cycles or plan components.

Plan Consistency

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.

Met-Ed's I&M Plan and associated inspection activities are performed in accordance with the Occupational Safety and Health Administration, National Electrical Safety Code ("NESC"), 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.

Record Keeping

Section 57.198(m). Record Keeping. An electric distribution company ("EDC") must maintain records of inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs.

In order to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs, Met-Ed will maintain inspection and maintenance records either electronically or in hard copy as required by state law.

Vegetation Management

Section 57.198(n)(1). Vegetation Management. The statewide minimum inspection and treatment cycle for vegetation management is between 4 – 8 years for distribution facilities. An EDC shall submit a condition-based plan for vegetation management for its distribution system facilities explaining its treatment cycle.

Program Description

Met-Ed performs vegetation management on its distribution circuits in order to promote the continued safe and reliable operation of its distribution system. The vegetation management program specification is designed to support line reliability, maintain access, make repairs, or restore service and to support safe and reliable service. The vegetation management program specification prunes vegetation to achieve five years of clearance and includes removal of selected incompatible trees within the clearing zone corridor, removal of certain defective limbs that are overhanging primary conductors, controlling selected incompatible brush mechanically and/or using herbicide, relieving limbs causing mechanical strain on secondary/service lines and removal of off-corridor priority trees that are dead, dying, diseased, and leaning or significantly encroaching the corridor.

Portions of a circuit that experience high customer interruption minutes due to vegetation-caused outages may be targeted to include the removal of certain healthy limbs which overhang primary conductors based on tree species and condition.

For portions of a circuit that have not experienced significant reliability issues due to vegetation-caused outages, a proactive inspection process will target selective vegetation removal for continued reliable system operation. This may include the extension of a cycle not to exceed a total of eight years. This process involves inspection of the vegetation to evaluate the extent of potential for vegetation to interfere with energized conductors. Factors to consider in the evaluation are the voltage and height of the conductor, the type of tree, its growth rate and branching habit. Trees that will impact safety or reliability will be maintained to the vegetation management program specification.

Methods used to manage and control vegetation include manual control methods using hand-operated tools, mechanical control using equipment-mounted saws, mowers or other devices. Removing incompatible vegetation may also include various herbicide application techniques such as, high volume foliage application, low volume foliage application, basal herbicide applications, stump applications, frill application, aerial application, bare soil treatment application and cut stubble applications. All herbicides shall be applied in accordance with all state, local and federal laws governing the use of herbicides.

Further detailed information regarding Met-Ed's vegetation management program may be found in the Vegetation Management Distribution Specifications.

Section 57.198(c). Time frames. The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.

Program Justification

In addition to complying with the provisions in Section 57.198(b), distribution vegetation management activities are performed in accordance with the Pennsylvania Pesticide Control Act, the Pennsylvania Administrative Code, and the Utility Arborist Association's Field Guide to Closed Chain of Custody for Herbicides in the Utility Vegetation Management Industry. All vegetation management activities are designed to achieve cycle length clearances, regardless of method employed. The vegetation management program specification seeks to maintain and control all vegetation in the space defined as the distribution clearing zone. The distribution clearing zone is the right-of-way corridor measured at a horizontal distance of fifteen feet on either side of the pole line or the established large tree edge, whichever is greater in width. The corridor is measured vertically to fifteen feet above the highest conductor attached to the pole or structure. Met-Ed has also applied a specific vegetation management approach to select line sections. This practice involves the removal of overhanging limbs outside the right-of-way as well as aggressive mitigation of hazard trees, with the intent of improving tree related reliability on the selected line sections.

Met-Ed's professional vegetation management staff performs inspections and approves all work conducted by vegetation management contractors. The Forestry personnel maintain an understanding of current and emerging techniques by attending industry trade conferences and maintaining memberships in industry trade organizations, such as Utility Arborist Association and the International Society of Arboriculture. The goal of the vegetation management department is to manage distribution corridors in a way that provides safe and reliable electricity while simultaneously working to make a sustainable habitat system on Met-Ed's rights-of-way.

As part of Met-Ed's approach to improving tree related reliability, the Company continues to analyze circuit electrical protection schemes and gives added attention to select line sections, such as those that serve high numbers of customers. Three distinct line sections have been identified and defined under existing protection schemes, as shown in the table below.

Zone 1	Zone 2	Zone 3
Three-phase circuitry from the circuit breaker to the first protective device	Three-phase circuitry beyond the first protective device	Single-phase and two-phase circuitry
Serves entire customer load	Serves a large percentage of customer load	Serves smallest percentage of customer load

In addition to Met-Ed's Distribution Vegetation Management Program, there are other distribution equipment inspection programs (e.g., Distribution Pole Inspections, Distribution Overhead Line Inspections, Distribution Transformer Inspections and Recloser Inspections) that allow trained utility personnel multiple opportunities to observe conditions on the distribution system. These conditions may include vegetation management situations that warrant further investigation.

Inspection Plan

The total number of circuit miles to be trimmed in 2021 and 2022 is based on the current system configuration (as of 2019) and thus is subject to change by the time the 2021 and 2022 plans commence.

Area	Inspections and Treatments Planned <i>Total Circuit Miles</i>	
	2021	2022
Easton <i>1,415 total circuit miles</i>	283	283
Hanover <i>1,972 total circuit miles</i>	394	394
Lebanon <i>1,500 total circuit miles</i>	300	300
Reading <i>3,153 total circuit miles</i>	631	631
Stroudsburg <i>1,067 total circuit miles</i>	213	213
York <i>2,349 total circuit miles</i>	470	470
Met-Ed <i>11,456 total circuit miles</i>		

RECEIVED

OCT -1 2019

Distribution Pole Inspections

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 inspections 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

Met-Ed shall visually inspect distribution wood poles on a twelve-year cycle. The purpose for inspecting distribution wood poles is to identify and repair unsafe conditions or conditions that may adversely affect service reliability or system performance, and to comply with the state regulatory agencies and the NESC.

This preventative maintenance inspection for wood poles will include a visual inspection as well as hammer-sounding as needed. The inspection consists of the recording of abnormal conditions from the groundline to the top of the pole including but not limited to the following:

- Damage – broken or leaning
- Equipment – crossarms, insulators, conductors, oil leaking
- Testing for decayed internal wood

In addition to the visual inspection, poles showing incipient decay or poles that are thirty-five years old or older will be bored to further assess the condition of the pole. This inspection consists of the recording of tests performed and abnormal conditions detected including but not limited to the following:

- Boring – testing for internal decay
- Verification of shell thickness

Further detailed information regarding Met-Ed’s inspection of wood poles may be found in the Distribution Inspection & Maintenance Practice – Wood Pole Groundline.

Section 57.198(n)(3). 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, then the pole shall be replaced within 30 days of the date of inspection.*

Corrective Maintenance

Wood poles and supporting structures with recorded defects that Met-Ed could expect to create an immediate risk to public or employee safety or affect the integrity of the circuit shall be repaired or replaced within thirty days. All remaining deficiencies will be evaluated and prioritized on a case-by-case basis.

Section 57.198(c). Time frames. *The plan must comply with the inspection and maintenance standards set forth in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Program Justification

Met-Ed's twelve-year inspection cycle for wood poles is based on accepted electric utility practices. The NESC Rule 12.121.A states "Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary." Twelve years between inspections allows enough time for proper planning and remediation prior to any problems negatively impacting personal safety, equipment integrity or service reliability.

In addition to Met-Ed's Distribution Pole Inspection Program, there are other distribution equipment inspection programs (e.g., Distribution Vegetation Management, Distribution Overhead Line Inspections, Distribution Transformer Inspections and Recloser Inspections) that allow trained utility personnel multiple opportunities to observe conditions on the distribution system. These conditions may include distribution pole situations that warrant further investigation.

Pole Loading Calculation

As a part of the I&M Plan for the period January 1, 2019 through December 31, 2020, the Commission previously exempted Met-Ed from conducting pole loading calculations as a part of its pole inspections. Met-Ed requests a continuation of the exemption for the currently proposed period.

Rather than conducting load calculations as part of each pole inspection, Met-Ed follows the practice of creating base line designs using FirstEnergy's Distribution Line

Construction Standards and Distribution Engineering Practices. FirstEnergy's Construction Standards are based on and updated each time a revised NESC Heavy Loading Standard is issued. The majority of the Company's service territory lies within the heavy loading zone and these standards provide basic guidance for most designs encountered by distribution line design personnel. All new facilities are designed consistent with NESC Heavy Loading Standard NESC C2-2012, Section 250. The Engineering Practices provide detailed guidance for both guying and pole loading, and additional engineering support is available to designers when more complex calculations are needed. Per the NESC, both of these resources include safety factors such that the deterioration of poles in service shall not reduce the strength capability of the pole below the required strength. Further, as the Company receives requests from other entities to attach their facilities to Met-Ed poles, an assessment, ranging from a visual inspection to a full-strength analysis, is performed based on pole attachment guidelines, experience and the situation encountered.

Inspection Plan

The total number of poles to be inspected in 2021 and 2022 is based on the current system configuration (as of 2019) and thus is subject to change by the time the 2021 and 2022 plans commence.

	Area	Pole Inspections Planned Number of Poles	
		2021	2022
Met-Ed <i>340,283 total poles</i>	Boyertown <i>22,171 total poles</i>	1,917	2,038
	Dillsburg <i>19,853 total poles</i>	1,654	1,276
	Easton <i>41,532 total poles</i>	4,100	4,502
	Gettysburg <i>14,392 total poles</i>	1,611	2,316
	Hamburg <i>21,866 total poles</i>	1,593	1,940
	Hanover <i>25,787 total poles</i>	2,661	2,223
	Lebanon <i>44,833 total poles</i>	4,499	3,841
	Reading <i>41,255 total poles</i>	2,983	2,702
	Stroudsburg <i>37,964 total poles</i>	3,739	3,372
	York <i>70,630 total poles</i>	3,244	3,771

Distribution Overhead Line Inspections

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

Met-Ed shall visually inspect distribution overhead lines and equipment on a five-year cycle. The purpose for inspecting overhead lines and equipment is to identify and repair unsafe conditions or conditions that may adversely affect service reliability, and to comply with the requirements of state regulatory agencies and the NESC. This program shall be limited to overhead facilities.

Circuits will be inspected on a five-year cycle to levelize labor commitments and expenses. This preventative maintenance will consist of a visual inspection and recording of abnormal conditions including but not limited to the following types of overhead circuit equipment:

- Conductors (wire and cable) – excessive slack, condition, damage, clearances
- Supporting structures (wood poles) – deteriorated condition, sustained damage (lightning, vehicle, woodpecker holes)
- Pole hardware (including insulators) – condition, damage
- Guying – condition, damage
- Pole-mounted distribution equipment (including overhead transformers) – condition, damage
- Switches
- Sectionalizers

Further detailed information regarding Met-Ed’s inspection of Distribution Overhead Lines may be found in the Distribution Inspection & Maintenance Practice – Overhead Circuits and Equipment.

RECEIVED

OCT -1 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Supporting structures with recorded defects that Met-Ed could reasonably expect to affect the integrity of the circuit shall be repaired or replaced within thirty days. All remaining deficiencies will be evaluated and prioritized on a case-by-case basis.

Section 57.198(c). Time frames. *The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Program Justification

As a part of the I&M Plan for the period January 1, 2019 through December 31, 2020, the Commission previously granted a waiver for overhead circuit inspection periodicity. Met-Ed requests a continuation of the waiver for the currently proposed period.

Met-Ed's five-year inspection cycle for overhead lines is based on accepted electric utility practices. The NESC Rule 12.121.A states "*Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary.*" Met-Ed's experience has shown the five-year inspection cycle to be successful in addressing problems in a timely manner, allowing for proper planning and remediation prior to the problem negatively impacting personal safety, equipment integrity or service reliability.

In addition to Met-Ed's Distribution Overhead Line Inspection Program, there are other distribution equipment inspection programs (e.g., Distribution Vegetation Management, Distribution Pole Inspections, Distribution Transformer Inspections and Recloser Inspections) that allow trained utility personnel multiple opportunities to observe conditions on the distribution system. Further, field personnel perform circuit assessments to address specific reliability concerns and to assess worst performing circuit performance. Lastly, Met-Ed may use infrared thermography on an as-needed basis on certain worst performing circuits or while performing circuit rehabilitation.

Inspection Plan

The total number of circuits to be inspected in 2021 and 2022 is based on the current system configuration (as of 2019) and thus is subject to change by the time the 2021 and 2022 plans commence.

	Area	Overhead Line Inspections Planned	
		Number of Circuits	
		2021	2022
Met-Ed 793 Total Circuits	Boyertown 33 total circuits	9	7
	Dillsburg 19 total circuits	7	4
	Easton 115 total circuits	17	22
	Gettysburg 31 total circuits	7	6
	Hamburg 23 total circuits	5	7
	Hanover 60 total circuits	7	12
	Lebanon 102 total circuits	19	19
	Reading 170 total circuits	40	29
	Stroudsburg 33 total circuits	7	9
	York 207 total circuits	37	54

Distribution Transformer Inspections

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. Installation 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

Met-Ed inspects overhead distribution transformers as part of the overhead line inspection. Above-ground pad-mounted transformers are inspected on a five-year cycle and below-ground transformers are inspected on an eight-year cycle. The purpose for inspecting distribution transformers is to identify and repair unsafe conditions or conditions that may adversely affect service reliability, and to comply with the requirements of state regulatory agencies and the NESC.

Overhead distribution transformers – visual inspection and recording of abnormal conditions including but not limited to the following:

- Equipment condition – oil leakage, arresters, rust, dents or evidence of contact

Above-ground pad-mounted equipment (transformers and switchgear) – inspection and recording of abnormal conditions including but not limited to the following:

- Equipment condition – oil leakage, cabinet damage, holes, washout
- Security – locking mechanisms
- Accessibility – as required for operation and maintenance purposes, including the installation of fences or shrubbery that could adversely affect access to and operation of the transformer and unauthorized excavation or changes in grade near the transformer
- Warning labels – electrical hazard warning label and landscaping instructions notice

Below-ground transformers – visual inspection and recording of abnormal conditions including but not limited to the following:

- Accessibility – verify cover is secured

- Equipment condition – visually inspect baffle

Further detailed information regarding Met-Ed’s inspection of distribution transformers may be found in the Distribution Inspection & Maintenance Practice – Underground Equipment.

Section 57.198(c). Time frames. The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC’s unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.

Program Justification

As a part of the I&M Plan for the period January 1, 2019 through December 31, 2020, the Commission previously granted a waiver for distribution transformer inspection periodicity. Met-Ed requests a continuation of the waiver for the currently proposed period.

Met-Ed’s five- and eight-year inspection cycles for distribution transformers are based on accepted electric utility practices and the experience of Met-Ed. The NESC Rule 12.121.A states “*Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary.*”

Met-Ed’s experience has proven the inspection cycles above to be successful in addressing problems in a timely manner, allowing for proper planning and remediation prior to the problem negatively impacting personal safety, equipment integrity or service reliability.

In addition to Met-Ed’s Distribution Transformer Inspections Program, there are other distribution equipment inspection programs (e.g., Distribution Vegetation Management, Distribution Pole Inspections, and Recloser Inspections) that allow trained utility personnel multiple opportunities to observe conditions on the distribution system. These conditions may include distribution transformer situations that warrant further investigation.

Inspection Plan

The total number of distribution transformers to be inspected in 2021 and 2022 is based on the current system configuration (as of 2019) and thus is subject to change by the time the 2021 and 2022 plans commence.

	Area	Type (Total Number of Transformers)	Transformer Inspections Planned	
			2021	2022
Met-Ed <i>185,337 total transformers</i>	Boyertown <i>15,539 total transformers</i>	Overhead Transformers <i>11,203 total transformers</i>	2,817	1,037
		Above-Ground Pad-mounted <i>4,251 total transformers</i>	830	191
		Below-Ground Transformers <i>85 total transformers</i>	15	0
	Dillsburg <i>11,762 total transformers</i>	Overhead Transformers <i>8,881 total transformers</i>	3,876	1,140
		Above-Ground Pad-mounted <i>2,839 total transformers</i>	1,467	277
		Below-Ground Transformers <i>42 total transformers</i>	28	1
	Easton <i>18,224 total transformers</i>	Overhead Transformers <i>13,880 total transformers</i>	3,520	2,498
		Above-Ground Pad-mounted <i>4,107 total transformers</i>	514	787
		Below-Ground Transformers <i>237 total transformers</i>	12	24
	Gettysburg <i>7,705 total transformers</i>	Overhead Transformers <i>6,290 total transformers</i>	1,739	321
		Above-Ground Pad-mounted <i>1,384 total transformers</i>	552	17
		Below-Ground Transformers <i>31 total transformers</i>	16	6
	Hamburg <i>11,102 total transformers</i>	Overhead Transformers <i>8,641 total transformers</i>	811	2,556
		Above-Ground Pad-mounted <i>2,380 total transformers</i>	138	630
		Below-Ground Transformers <i>81 total transformers</i>	12	26
Hanover <i>15,963 total transformers</i>	Overhead Transformers <i>11,248 total transformers</i>	1,000	926	
	Above-Ground Pad-mounted <i>4,633 total transformers</i>	381	70	

		Below-Ground Transformers <i>82 total transformers</i>	3	0
Lebanon <i>23,045 total transformers</i>		Overhead Transformers <i>16,857 total transformers</i>	2,307	2,655
		Above-Ground Pad-mounted <i>5,833 total transformers</i>	1,076	639
		Below-Ground Transformers <i>355 total transformers</i>	71	62
Reading <i>23,797 total transformers</i>		Overhead Transformers <i>17,638 total transformers</i>	4,246	1,517
		Above-Ground Pad-mounted <i>5,849 total transformers</i>	1,256	69
		Below-Ground Transformers <i>310 total transformers</i>	66	1
Stroudsburg <i>14,109 total transformers</i>		Overhead Transformers <i>11,987 total transformers</i>	2,193	4,477
		Above-Ground Pad-mounted <i>2,056 total transformers</i>	601	747
		Below-Ground Transformers <i>66 total transformers</i>	50	6
York <i>44,091 total transformers</i>		Overhead Transformers <i>30,736 total transformers</i>	5,167	5,332
		Above-Ground Pad-mounted <i>13,021 total transformers</i>	1,471	2,226
		Below-Ground Transformers <i>334 total transformers</i>	7	53

RECEIVED
OCT -1 2019
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Recloser Inspections

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

Met-Ed visually inspects distribution line reclosers annually. The purpose for inspecting distribution line reclosers is to identify and repair unsafe conditions or conditions that may adversely affect service reliability or system performance, and to comply with the requirements of state regulatory agencies and the NESC.

The annual preventative maintenance consists of counter readings and field inspection. The counter readings are obtained to assess system performance based on the number of operations. The field inspection includes but is not limited to the following:

- Type of recloser and current rating
- Counter reading
- Condition – rust, dents, physical damage, leaks, lightning damage
- Equipment – surge arresters, tank-ground connections, by-pass switches, control battery, pole
- Grounds – damage, condition

Further detailed information regarding Met-Ed's inspection of reclosers may be found in the Distribution Inspection & Maintenance Practice – Line Reclosers.

Section 57.198(c). Time frames. The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.

Program Justification

Met-Ed's annual inspection cycle for reclosers is based on accepted electric utility practices and the experience of Met-Ed. The NESC Rule 12.121.A states "Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary." One year between inspection cycles has proven to be successful in addressing problems in

a timely manner, allowing for proper planning and remediation prior to the problem negatively impacting personal safety, equipment integrity or service reliability.

In addition to Met-Ed's Recloser Inspections Program, there are other distribution equipment inspection programs (e.g., Distribution Vegetation Management, Distribution Pole Inspections, Distribution Overhead Line Inspections, and Distribution Transformer Inspections) that allow trained utility personnel multiple opportunities to observe conditions on the distribution system. These conditions may include recloser equipment situations that warrant further investigation.

Inspection Plan

The total number of recloser units to be inspected in 2021 and 2022 is based on the current system configuration (as of 2019) and thus is subject to change by the time the 2021 and 2022 plans commence.

	Area	Type	Recloser Inspections Planned	
			Total Number of Reclosers	
			2021	2022
Met-Ed <i>1,114 total reclosers</i>	Boyertown <i>61 total reclosers</i>	Single Phase <i>20 total reclosers</i>	20	20
		Three Phase <i>41 total reclosers</i>	41	41
	Dillsburg <i>75 total reclosers</i>	Single Phase <i>26 total reclosers</i>	26	26
		Three Phase <i>49 total reclosers</i>	49	49
	Easton <i>110 total reclosers</i>	Single Phase <i>20 total reclosers</i>	20	20
		Three Phase <i>90 total reclosers</i>	90	90
	Gettysburg <i>50 total reclosers</i>	Single Phase <i>13 total reclosers</i>	13	13
		Three Phase <i>37 total reclosers</i>	37	37
	Hamburg <i>65 total reclosers</i>	Single Phase <i>30 total reclosers</i>	30	30
		Three Phase <i>35 total reclosers</i>	35	35
	Hanover <i>90 total reclosers</i>	Single Phase <i>33 total reclosers</i>	33	33
		Three Phase <i>57 total reclosers</i>	57	57
	Lebanon <i>196 total reclosers</i>	Single Phase <i>71 total reclosers</i>	71	71
		Three Phase <i>125 total reclosers</i>	125	125
	Reading <i>124 total reclosers</i>	Single Phase <i>40 total reclosers</i>	40	40
		Three Phase <i>84 total reclosers</i>	84	84

	Stroudsburg 90 total reclosers	Single Phase 9 total reclosers	9	9
		Three Phase 81 total reclosers	81	81
	York 253 total reclosers	Single Phase 60 total reclosers	60	60
		Three Phase 193 total reclosers	193	193

Substation Inspections

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

Met-Ed inspects its distribution substations twelve times annually. The purpose of these monthly inspections of the distribution substations is to ensure that any developing substation problems are identified and addressed in a timely manner in support of system reliability and electrical safety.

There are three types of the preventative maintenance inspections that are performed at Met-Ed substations during a twelve-month period. The chart below illustrates the type of inspection performed each month¹:

Inspection Type	Month											
	1	2	3	4	5	6	7	8	9	10	11	12
Safety and Security of Facilities/Visual Equipment Inspection/Reporting and Recording of Deficiencies and Relay Operations (Class C)	X	X	X	X	X	X	X	X	X	X	X	X
Safety/Security, Visual Equipment Inspection and Record Readings (Class B)			X			X			X			X
Seasonal Maintenance (Class A)			X						X			

The following is a summary of each type of inspection that is conducted at Met-Ed substations:

1. *Safety and Security of Facilities and Visual Equipment Inspection of Electrical Equipment and Reporting/Recording Identified Deficiencies and Relay Operations (Class C).* Monthly visual inspection of substation equipment, structures and hardware that also includes the recording of abnormal conditions or deficiencies. This inspection may include but is not limited to the following:
 - General condition – read and record ambient temperature
 - Perimeter fence inspection (gate locks, fence and gate grounds, warning signs)

¹ For illustrative purposes only.

- Yard and facility inspection (equipment grounds, vegetation condition, general yard condition, equipment condition, oil levels and leaks, structure/hardware condition, hotspots, conductors/switches/connections)
 - Building inspection (security, integrity, indication lights)
 - Visual inspection of major equipment (power transformers, circuit breakers, instrument transformers, etc.)
 - Relays, electronic controls, and panel meters for alarms and targets
 - Batteries and chargers
2. *Safety and Security, Visual Equipment Inspection and Record Readings (Class B).* In addition to the safety and security and visual equipment inspection that is performed monthly, every three months an additional visual inspection that includes the recording of readings is performed. This inspection may include but is not limited to all items listed under the Class C inspection as well as the following types of substation equipment:
- Recording of amps and load readings
 - Recording of counter and gauge readings
 - Inspection/test of carrier communication equipment
 - Inspection of microwave/radio sites and engine generators – generator alarms and battery
3. *Seasonal Maintenance - Summer and Winter Readiness (Class A).* In addition to the monthly and three-month inspections, every six months a more comprehensive inspection of the substation and substation equipment is performed. This inspection may include but is not limited to all items listed under the Class C and B inspections as well as the following types of substation equipment:
- Servicing fire protection equipment
 - Servicing eye wash stations
 - Yard lighting
 - Servicing filters and HVAC systems
 - Servicing of equipment cabinet heaters
 - Servicing engine generators

Further detailed information regarding Met-Ed's inspection of substations may be found in Section 20P – Substation Patrol Inspection of the Substation Maintenance Practice and Methods.

Section 57.198(c). Time frames. *The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Program Justification

Patrol inspections of distribution substations are performed on a monthly, quarterly and semi-annual basis, with a tiered approach to preventative maintenance. This tiered approach has proven effective in addressing emerging problems and allows for proper planning and remediation prior to the problem negatively impacting personal safety, equipment integrity or service reliability.

Monthly inspections ensure a trained, physical presence within the substation. Frequent, in-person inspections have been effective in detecting the degradation of facilities not always captured by existing local and remote surveillance and monitoring tools. In addition to visual inspections, load and counter readings are recorded every three months to allow local engineering to conduct planning and load studies. Finally, an intensive inspection is conducted two times a year, in spring and fall.

Advancements in technology have refined how substation equipment inspections are performed, and those advancements have been leveraged to ensure the highest levels of safety and reliability of the substation and substation equipment. For example, results from equipment and patrol inspections are captured by field personnel on site and entered directly into the maintenance database where they can be tracked. Through the use of historical inspection data and enhanced software, Met-Ed is able to target specific equipment and trigger maintenance based on equipment condition. For example, counter readings that are obtained during the three-month inspection cycle are used to trigger condition-based maintenance. Both predictive and condition-based programs extend the operating life of the equipment. They also optimize the necessary maintenance interval, improve service reliability, and reduce downtime that is typically experienced when equipment is taken off line which reduces exposure of the grid, all with consistency and efficiency.

Inspection Plan

The total number of substations to be inspected in 2021 and 2022 is based on the current system configuration (as of 2019) and thus is subject to change by the time the 2021 and 2022 plans commence.

RECEIVED

OCT -1 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

	Area	Substation Inspections Planned <i>Number of Substations</i>	
		2021	2022
Met-Ed 221 total substations	Easton 45 substations	540	540
	Lebanon 35 substations	420	420
	Reading 63 substations	756	756
	York 78 substations	936	936

RECEIVED

OCT -1 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

... that use following services:

UPS Next Day Air®
UPS Worldwide Express
UPS 2nd Day Air®
UPS Worldwide Expedi

Apply shipping docum

UPS Ground

ups
UPS Next Day Air®
UPS Worldwide Express®
Shipping Document

WEIGHT	LTR. <input checked="" type="checkbox"/>	PAK <input type="checkbox"/>	WEIGHT	DIMENSIONAL WEIGHT If Applicable	LARGE PACKAGE <input type="checkbox"/>	SHIPPER RELEASE <input type="checkbox"/>
--------	--	------------------------------	--------	----------------------------------	--	--

EXPRESS (INT'L)
 DOCUMENTS

Shipper authorizes UPS to act as forwarding agent for export cleared and customs programs. Shipper certifies that these commodities, technology or software, if

SHIPMENT FROM
UPS ACCOUNT NO. **NET-440**

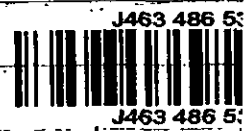
REFERENCE NUMBER **503003**

TELEPHONE
TERESA Harold
First Energy
2800 Poitersville Pike
Reading PA 19605

DELIVERY TO

TELEPHONE
Rose Mary Chiavetta
secretary
PA PVC
400 North Street
Harrisburg PA 17120

SATURDAY DELIVERY



P	S
A04785	OCT020107

400 NORTH ST
HARRISBURG PA 17120

P: SILVER S: BBLUE I: 39D
PROC - 1768
J4634866367 1030
RMC1U2P PAHAR098 OCT 2 07:18:59 2010
US 1711 HIP 19.03.03 ZP4808

UPS Next Day Air®



TRACKING NUMBER

DATE OF SHIPMENT
01/11

010191120CS 6/14 RRD United Parcel Service, Louisville, KY