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September 2, 2022

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
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Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for Approval of its Long-Term
Infrastructure Improvement Plan for the Period January 1, 2023 through
December 31, 2027
Docket No. P-2022-**

Dear Secretary Chiavetta:

Enclosed for filing is the Petition of PPL Electric Utilities Corporation for Approval of a Long-Term Infrastructure Improvement Plan. Copies are being served on the statutory advocates and all parties of record to the Company's most recent base rate proceeding at Docket No. R-2015-2469275 as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/dmc
Enclosures

cc: Certificate of Service

CERTIFICATE OF SERVICE

Docket No. P-2022-_____

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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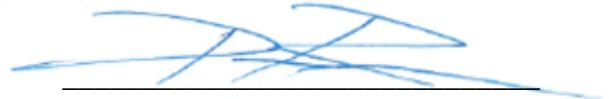
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Date: September 2, 2022



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of its Long-Term Infrastructure : Docket No. P-2022-_____
Improvement Plan for the Period January 1, :
2023, through December 31, 2027 :

**PETITION OF PPL ELECTRIC UTILITIES CORPORATION FOR
APPROVAL OF A LONG-TERM INFRASTRUCTURE
IMPROVEMENT PLAN**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 66 Pa. C.S. § 1352(a) and 52 Pa. Code §§ 121.1 *et seq.*, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby requests approval of its third Long-Term Infrastructure Improvement Plan (“LTIIIP”) for the period January 1, 2023, through December 31, 2027. A copy of the Company’s proposed third LTIIIP is provided as “**Attachment 1**” to this Petition. This third LTIIIP replaces the Company’s current second LTIIIP that was approved on December 21, 2017, at Docket No. P-2017-2622393, which is set to expire on December 31, 2022. Under the third LTIIIP, the Company proposes to continue its accelerated repair, improvement, and replacement of aging infrastructure as described below and in further detail in the proposed LTIIIP.

PPL Electric respectfully requests that the Pennsylvania Public Utility Commission (“Commission”) approve the third LTIIIP, as further described in this Petition for the period January 1, 2023, through December 31, 2027.

I. INTRODUCTION

1. This Petition is filed by PPL Electric, a public utility subject to the regulatory jurisdiction of the Commission.

2. PPL Electric's address is PPL Electric Utilities Corporation, Two North Ninth Street, Allentown, Pennsylvania 18101.

3. PPL Electric's attorneys are:

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PPL Electric's attorneys are authorized to receive all notices and communications regarding this filing.

4. PPL Electric furnishes electric distribution, transmission and default supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

5. PPL Electric is a "public utility," an "electric distribution company" ("EDC"), and a "default service provider" as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803.

6. On February 14, 2012, Governor Corbett signed into law Act 11 of 2012 (“Act 11”), which amended Chapters 3, 13, and 33 of Title 66 of the Code to allow, among other things, EDCs, natural gas distribution companies, water utilities, wastewater utilities and city natural gas distribution operations to establish a distribution system improvement charge (“DSIC”).

7. Act 11 provides utilities with the ability to implement a DSIC to recover reasonable and prudent costs incurred to repair, improve, or replace certain eligible distribution property that is part of the utility’s distribution system. Eligible property for EDCs is defined in Section 1351 of the statute. *See* 66 Pa. C.S. § 1351(1). As a precondition to the implementation of a DSIC, a utility must file an LTIP with the Commission that is consistent with the provisions of Section 1352 of the statute. *See* 66 Pa. C.S. § 1352(a).

8. On August 2, 2012, the Commission issued an Implementation Order establishing procedures and guidelines necessary to implement Act 11. *Implementation of Act 11 of 2012*, Docket No. M-2012-2293611 (Order entered August 2, 2012) (“*Implementation Order*”). The *Implementation Order* adopted the requirements established in Section 1352, provided additional standards that each LTIP must meet, and gave guidance to utilities for meeting the Commission’s standards.

9. On January 10, 2013, the Company’s first LTIP was approved by the Commission at Docket No. P-2012-2325034. The Company’s first LTIP expired on December 31, 2017.

10. On January 15, 2013, PPL Electric filed a petition seeking approval of a DSIC. By Orders entered May 23, 2013 and April 9, 2015, the Commission approved PPL Electric’s DSIC.

11. On December 21, 2017, the Company's second LTIP was approved by the Commission at Docket No. P-2017-2622393. The Company's second LTIP is set to expire on December 31, 2022.

12. The Commission's LTIP regulations became effective on December 20, 2014. *See 52 Pa. Code §§ 121.1 et seq.* The LTIP regulations provide the elements that an LTIP must include to be approved. Specifically, an LTIP must include the following eight major elements:

- (a) Identification of types and age of eligible property owned and operated by the utility for which it is seeking DSIC recovery;
- (b) An initial schedule for planned repair and replacement of eligible property;
- (c) A general description of location of the eligible property;
- (d) A reasonable estimate of quantity of eligible property to be improved or repaired;
- (e) Projected annual expenditures and means to finance the expenditures;
- (f) A description of the manner in which infrastructure replacement will be accelerated and how repair, improvement or replacement will ensure and maintain adequate, efficient, safe, reliable and reasonable service;
- (g) A workforce management and training program designed to ensure that the utility will have access to a qualified workforce to perform work in a cost-effective, safe and reliable manner; and
- (h) A description of a utility's outreach and coordination activities with other utilities, Department of Transportation and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIP.

52 Pa. Code § 121.3.

13. The Commission's LTIP regulations further provide that a utility seeking to continue its DSIC mechanism after the expiration of its LTIP must file a new LTIP with the

Commission at least 120 days prior to the expiration of the currently-effective LTIIIP. 52 Pa. Code § 121.5.

14. PPL Electric's proposed LTIIIP addresses each of the eight elements listed in the LTIIIP regulations, as summarized in this Petition, and is being filed at least 120 days prior to the second LTIIIP's expiration on December 31, 2022.

II. PROPOSED LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN

A. PROPERTY TO BE IMPROVED, REPAIRED AND REPLACED

15. In accordance with the Commission's *Implementation Order*, the LTIIIP regulations and statute, PPL Electric has focused its LTIIIP on distribution plant that is DSIC eligible. *Implementation Order*, p. 18; 52 Pa. Code § 121.3(b).

16. All of the property PPL Electric has included in its LTIIIP meets the definition of eligible property found in Section 1351(1), which includes the following items: poles; overhead conductors; distribution substation equipment; fixtures and devices related to the eligible property such as circuit breakers, fuses, reclosers, and crossarms; unreimbursed costs related to highway relocation projects; and other related capitalized costs.

17. Nearly half of PPL Electric's distribution system was constructed 50 or more years ago as a result of the economic expansion and building boom of the 1960's and 1970's. As this equipment deteriorates due to age, environmental exposure, and added load, it has become increasingly critical to plan for the repair, upgrade, and/or replacement of these assets through the initiatives outlined in the LTIIIP.

18. The LTIIIP covers a broad spectrum of distribution related equipment and facilities, which have been separated into various asset categories. (*See Attachment 1, pp. 11-34.*) Within each of these categories, PPL Electric has identified specific programs to address the various elements, equipment, and facilities that make up the asset classes. Each program is

described individually, with an estimated replacement schedule and estimated costs as applicable or appropriate.

19. For each individual program included in the LTIP, PPL Electric has provided the following information: a description of the program and its purpose; a description of how PPL Electric identifies equipment for replacement within each program and the appropriate course of action to improve identified equipment; the scope of the program, including a reasonable estimate of the quantity of property to be improved where applicable; and the location of planned replacements where applicable. These detailed profiles of the individual programs are provided in the LTIP. (*See Attachment 1, pp. 13-34.*)

20. Appendix A to the LTIP provides a summary of the types and average age of eligible property to be replaced. (*See Attachment 1, Appx. A.*)

21. The LTIP also provides the total amount projected to be spent by the Company annually and over the life of the five-year plan. (*See Attachment 1, p. 9.*)

B. SCHEDULE FOR REPAIR AND REPLACEMENT

22. The proposed LTIP covers the five-year period January 1, 2023, through December 31, 2027.

23. The estimated schedule for each individual LTIP program has been included in the program descriptions. (*See Attachment 1, pp. 13-34.*)

24. PPL Electric has estimated the number of replacements in a variety of distribution asset categories over the five-year LTIP period. In estimating its replacement schedule, a number of factors were considered. Some of the initiatives, such as animal guarding, clearly have implied end-points, where no further opportunities for improvement remain. Others, such as distribution automation, eventually experience diminishing returns over time. Also, some programs, such as pole reinforcement and replacement, will be ongoing. Finally, some programs

may become obsolete, while new programs may become desirable as a result of the evolution of new technologies.

25. Because of these and other variables, the effectiveness of these programs is reviewed annually, and programs are added, deleted, and/or modified, as necessary, to ensure that the expenditures are providing the desired benefits to customers at a reasonable cost.

26. Therefore, while PPL Electric has provided an estimated schedule for when certain replacements will take place, that schedule is subject to change as a result of PPL Electric's ongoing review process and emergent resource requirements.

C. LOCATION OF ELIGIBLE PROPERTY

27. The individual program descriptions in the LTIP provide a description of the location of eligible property to be repaired and replaced. (*See* Attachment 1, pp. 13-34.)

D. REASONABLE ESTIMATE OF THE QUANTITY OF PROPERTY TO BE IMPROVED

28. The individual program descriptions in the LTIP provide an estimate of the quantity of eligible property to be improved or repaired, as well as the Company's basis for these estimates. (*See* Attachment 1, pp. 13-34.)

E. PROJECTED ANNUAL EXPENDITURES AND MEANS TO FINANCE THE EXPENDITURES

29. The LTIP provides the Company's projected expenditures on a yearly basis for each of the individual programs for the five-year period, the total projected expenditures for each program at the conclusion of the five-year period, and the overall projected annual and total expenditures for all DSIC eligible distribution property. (*See* Attachment 1, p. 11.)

30. The Company intends to finance the costs of its DSIC-eligible work through its usual financing mechanisms: debt and equity. In each DSIC rate filing, the Company will identify its capital structure and cost of debt, in addition using the Return on Equity as

determined in its base rate case proceeding or as defined in the most recent applicable Commission Quarterly Financial Report.

31. To ensure that its individual programs are cost-effective investments, PPL Electric will routinely review the effectiveness of its programs. Program/project impact on System Average Interruption Duration Index (“SAIDI”) and System Average Interruption Frequency Index (“SAIFI”), in addition to potential reductions in outage response costs, is compared to the overall program/project costs. PPL Electric utilizes a project prioritization process that defines the cost-effectiveness of programs/projects to ensure effective optimization of reliability investments.

32. PPL Electric utilizes the information from its ongoing reviews of the effectiveness of its programs to determine the most cost-effective strategy for replacing its distribution infrastructure on a going forward basis. Reliability metric performance can result in the redirection of spending to help ensure the Company’s ability to meet targets.

F. ACCELERATION OF INFRASTRUCTURE IMPROVEMENT

33. In its *Implementation Order*, the Commission noted that some utilities had already taken substantial steps toward increasing capital investment to address the issue of aging infrastructure. For those utilities, the Commission requested that the LTIP “reflect how the DSIC will maintain or augment acceleration of infrastructure replacement and prudent capital investment.” *Implementation Order*, p. 19.

34. As described in the LTIP, PPL Electric has already significantly increased its capital expenditures on distribution related infrastructure over historical spend. (*See Attachment 1, p. 7, Figure 4.*) Specifically, as shown in Figure 4 of the LTIP, PPL Electric’s average annual capital investments increased from approximately \$88 million during the 2008-2012 period to approximately \$180 million during the 2018-2022 period.

35. As a result of these investments, PPL Electric arrested the increase in failed equipment and the current trend is flat to mildly decreasing. Even with these investments, the average age of equipment increased slightly since the second LTIP was approved.

36. In addition, while projected spending under this proposed LTIP is lower than the 2018-2022 period, continued capital investment is necessary to maintain or improve the recently flattened trend in equipment failure.

37. PPL Electric is aware of the direct impact the equipment included in the LTIP has on its reliability metrics. (*See Attachment 1, Appx. B.*) PPL Electric will use these metrics to monitor the success of its LTIP programs. Those programs are expected to prevent the growth in failures caused by aging equipment and will eventually reduce the number of equipment failures experienced on PPL Electric's distribution system.

G. WORKFORCE MANAGEMENT AND TRAINING PLAN

38. The Company's workforce management and training program is described in the LTIP. (*See Attachment 1, pp. 8-10.*)

39. PPL Electric utilizes a wide variety of programs and tools to ensure that it has a qualified workforce.

40. As a measure to ensure the use of a qualified workforce, PPL Electric has adopted the definition of a Qualified Electrical Worker from the Occupational Safety and Health Administration ("OSHA") Regulation 29 CFR § 1910.269 Electrical Power Generation, Transmission and Distribution, which is defined in the PPL Electric Safety Rule Book and is provided to each employee. It is also incorporated into the training and qualification process for all electrical workers.

41. PPL Electric administers a rigorous, formal training and evaluation process for all qualified electrical workers. Training is required before an employee may perform work

independently on exposed, energized electrical equipment greater than 50 volts. Training requirements and programs are unique to the job classification and work being performed. Curriculum documents, outlining subject areas and training durations by job classification have been developed. Training may require up to five years to complete and incremental qualifications, following assessment, are identified throughout the duration of the training program. Retraining is conducted on a periodic basis as required by OSHA or more frequently when determined necessary.

42. For its contractors, PPL Electric's Sourcing department administers a standard process for soliciting contractors to perform work identified to be completed by independent contractors. The process includes issuance of a Request for Proposal ("RFP") to various contractors. Responses to the RFP are evaluated based on detailed financial and technical schedules that compare respondents' capabilities. Part of the RFP evaluation process includes evaluating the qualification of contractors to perform work (both technical and financial capabilities to meet the contractual commitments, and level of qualification of employees) and may include reference checks if appropriate.

43. Most independent contractors employ personnel through the building trades, which includes Union apprenticeship programs to help ensure that employees are qualified to perform assigned work. Employee qualification programs for non-Union independent contractors are stringently reviewed to assess the contractor's training program, such as on-the-job training and certification programs.

44. PPL Electric monitors contractor performance through several activities that may include direct job oversight through on-site supervision, monthly scorecards that evaluate such

areas as job quality, safety performance, cost, and validating billing activities that meet contractual expectations.

H. OUTREACH AND COORDINATION ACTIVITIES

45. PPL Electric's outreach and coordination activities with other utilities, the Pennsylvania Department of Transportation, and local governments are described in the LTIP. (See Attachment 1, p. 8.) PPL Electric has established procedures for communicating with such entities regarding projects.

III. NOTICE AND EVIDENTIARY HEARINGS

46. Pursuant to the Commission's regulations, PPL Electric is serving this Petition and the attached LTIP on the statutory advocates and all parties of record in the Company's most recent base rate proceeding at Docket No. R-2015-2469275.

47. Neither Act 11 nor the Commission's regulations require hearings on a proposed LTIP.

48. The Commission's regulations provide a 30-day comment period for proposed LTIPs and state that those comments raising material factual issues will be referred to the Office of Administrative Law Judge. See 52 Pa. Code § 121.4(c).

49. Accordingly, it is unknown at this time whether PPL Electric's proposed third LTIP will be subject to evidentiary hearings.

IV. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the third Long-Term Infrastructure Improvement Plan for the period January 1, 2023, through December 31, 2027, as set forth in this Petition and the attachment hereto.

Respectfully submitted,



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Dated: September 2, 2022

Attorneys for PPL Electric Utilities Corporation

Attachment 1

2023-2027 LTIP

PPL Electric Utilities Corporation

Long-Term Infrastructure Improvement Plan

PPL Electric Utilities Corporation

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PPL Electric Utilities Corporation

Introduction

PPL Electric Utilities Corporation (“PPL Electric” or “Company”) is submitting this Long Term Infrastructure Improvement Plan (“LTIIIP”) pursuant to the requirements of Subchapter B, Distribution Systems, of the Public Utility Code, 66 Pa.C.S. §§ 1350-1360, the Public Utility Commission’s (“PUC”) Implementation Order for Establishment of a Distribution System Improvement Charge, entered on August 2, 2012 at Docket No. M-2012-2293611 and the Commission’s regulations at 52 Pa. Code §§ 121.1 et seq. This LTIIIP addresses a broad spectrum of Distribution Asset Management initiatives that the Company will use to continue its repair, improvement and replacement of aging infrastructure under this process, and is for the five-year period beginning January 1, 2023, and ending December 31, 2027.

PPL Electric strives to operate as efficiently as possible by performing the work required to maintain system integrity and reliability. Performance indicators such as System Average Interruption Frequency Index (“SAIFI”), Customer Average Interruption Duration Index (“CAIDI”) and System Average Interruption Duration Index (“SAIDI”) show that PPL Electric has been successful in its efforts. However, a generally flat to mildly decreasing trend in equipment failures, combined with an aging infrastructure, indicate that PPL Electric needs to continue to invest in its distribution system. As equipment failures remain flat to mildly decreasing, PPL Electric has been experiencing a significant increase in maintenance spending beyond normal inflationary pressures. The driver is a combination of both increased corrective and planned maintenance. PPL Electric has initiated and enhanced maintenance practices and programs to repair, improve, or replace certain distribution facilities in order to ensure adequate, efficient, safe and reliable service.

Addressing aging infrastructure will require ongoing investment. Such investment includes not only replacing aging equipment, but also investment in advanced equipment and communication technologies that can facilitate further system reliability improvements. If continued proactive re-investment does not occur, it is expected that system reliability will degrade, while the overall cost to maintain the distribution system will continue to rise. By investing in its distribution system, PPL Electric will ensure that its system continues to be safe, reliable, and able to meet the growing needs and expectations of its customers.

PPL Electric believes that managing finite resources to produce optimal results is essential for maintaining customer satisfaction. Criteria for program inclusion into the Long-Term Infrastructure Improvement Plan is not whether any single activity produces a positive reliability result, but rather, which portfolio of activities produces the best result for a given expenditure. PPL Electric’s goal is focused on results (i.e., the reliability experienced by customers and associated rate impacts), not the rote execution of particular tasks.

Reliability Experience

The Distribution Asset Planning process employed by PPL Electric has been focused on maintaining reliability at the level that existed prior to passage of the Electricity Generation Customer Choice and Competition Act (“Customer Choice Act”). Since the 1994-1998 benchmark period, which defines PPL Electric’s reliability performance targets, PPL Electric’s service reliability has experienced annual swings, positive and negative, resulting largely from varying weather conditions. Historical benchmark performance is illustrated in Figures 1 and 2.

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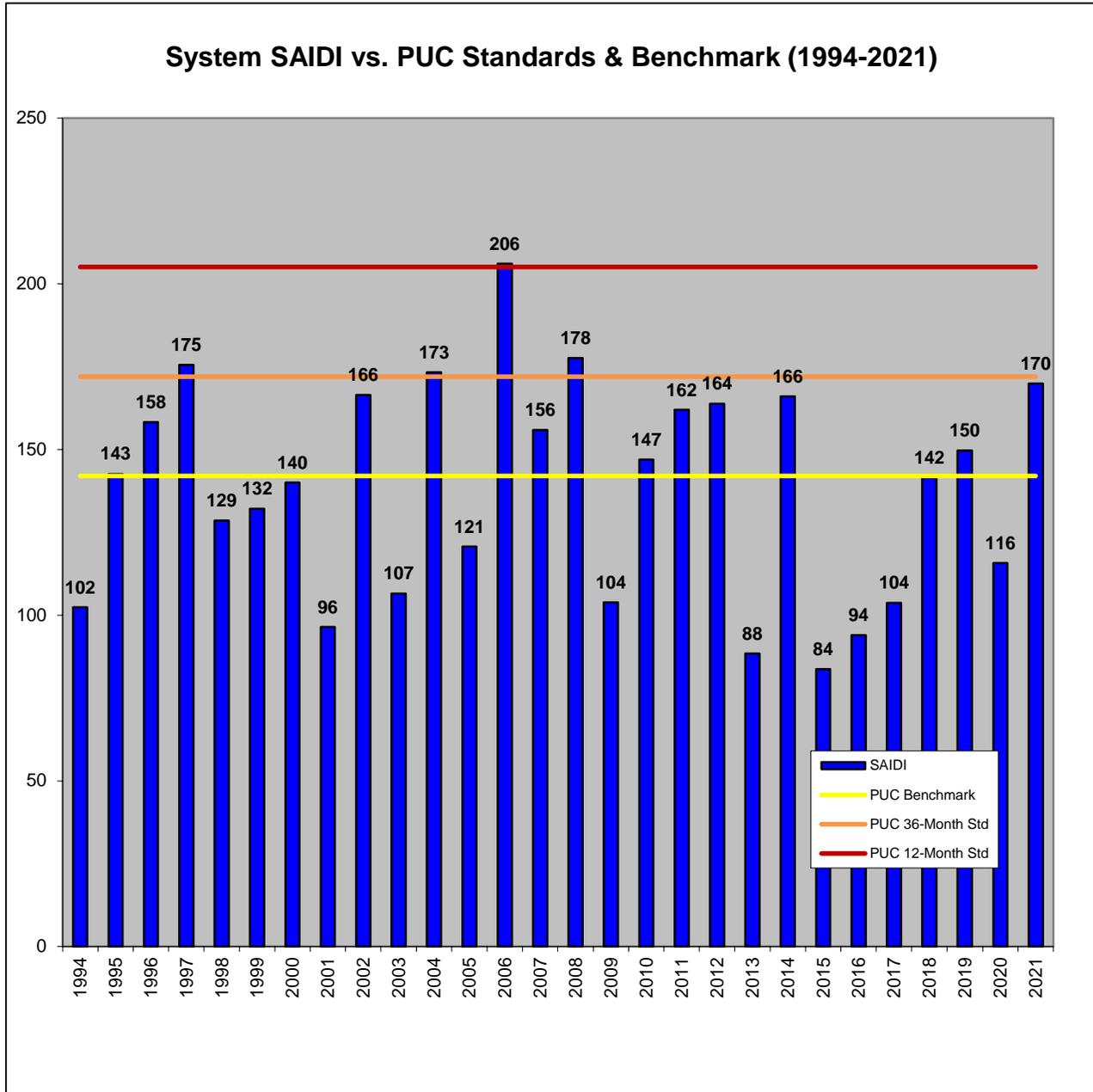


Figure 1: PPL Electric's SAIDI Performance

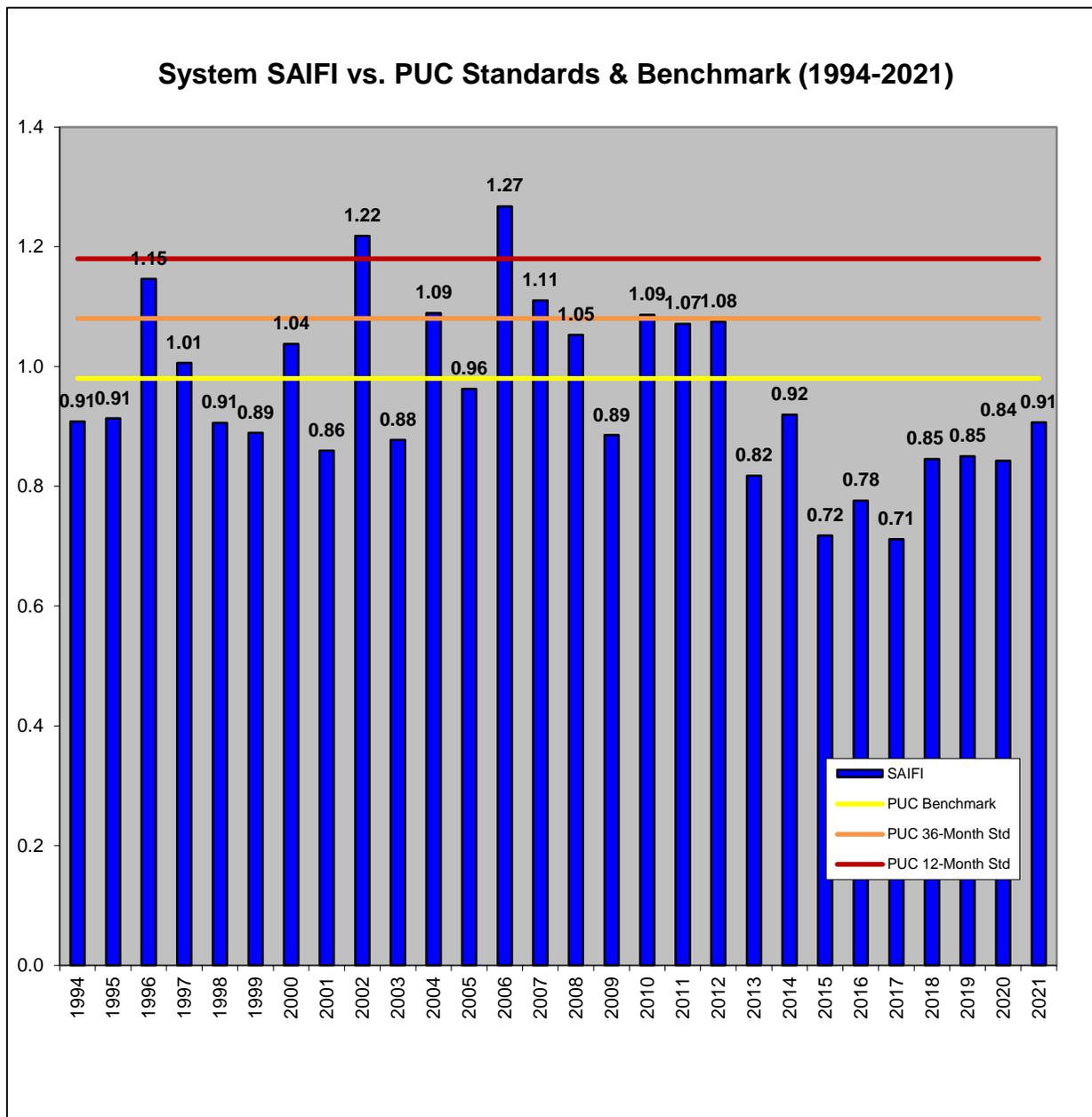


Figure 2: PPL Electric’s SAIFI Performance

A significant risk to PPL Electric’s ability to meet reliability benchmarks is the large portion of distribution facilities, many of which were installed in the 1960’s and 1970’s, that are now beyond or nearing the end of their design lifetime. See Appendix A for average age of major units of property. The resultant effect on non-storm-related equipment failures is illustrated by the chart in Figure 3 below.

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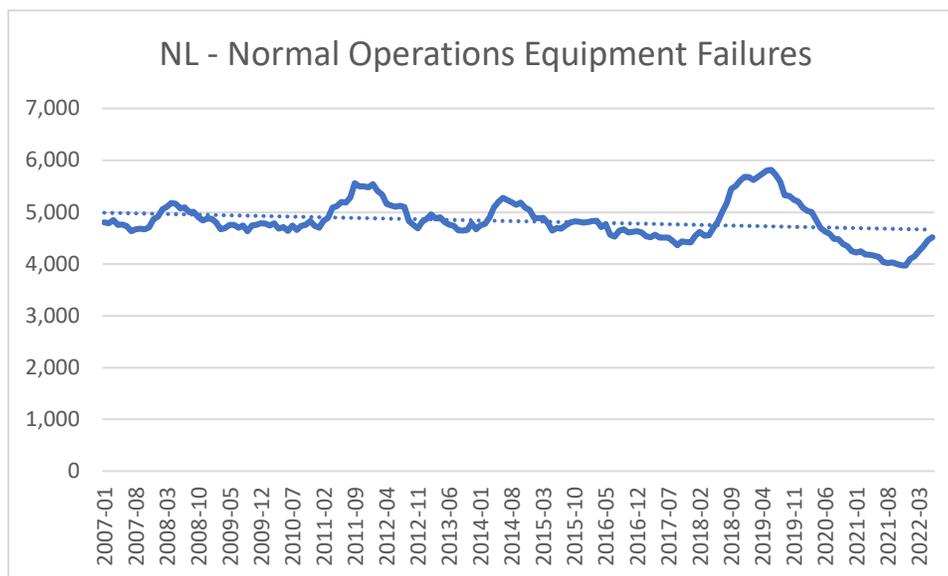


Figure 3: Equipment Failure Service Interruption Cases

The number of no-light cases due to equipment failures is trending slightly downward due to investments over the past five to ten years. The need to remediate that equipment which is at or near end-of-life remains to maintain or improve this favorable trajectory. Components contributing the most significantly to distribution equipment failures include poles/arms/attachments, overhead and underground conductors, switches, and substation equipment. See Appendix B for further details on asset contribution to reliability metrics.

Response to Aging Equipment

PPL Electric's reliability investment process is forward-looking and proactive. It consists of the following:

- Analyze and identify the drivers of historical trends of causes of service outages and other power service problems.
- Forecast future reliability metrics (SAIDI, SAIFI, and CAIDI) given existing mitigation programs' effect on the identified drivers.
- Identify new programs, policies, and activities to enhance or accelerate existing mitigation programs to avoid forecasted gaps between future reliability and benchmark targets.
- Identify, evaluate, and implement new technologies that enhance the Company's condition monitoring strategy.
- Evaluate and adjust existing programs, policies, and activities to produce the desired future results.
- Perform targeted data analytics against the Company's aging infrastructure utilizing real-time, or near real-time, operational data to further improve reliability performance.

PPL Electric Utilities Corporation

- Incorporate the resulting portfolio of existing and new programs, policies, and activities in PPL Electric’s five-year business plan.

In February 2018, PPL Electric’s Reliability Principles and Practices (“P&P”) were revised to help reduce the overall impact to the Company’s customers from outages due to various causes, including but not limited to, equipment failures. The P&P sets forth a set of Principles that PPL Electric follows to plan, protect, and operate the Electrical Distribution System (“EDS”). These Principles are implemented through a set of standard Practices that are used as guidelines in designing the EDS. These Practices are reasonable, acceptable, and consistent with leading utility practices. More specifically, to reduce the number of customers experiencing permanent outages and outage duration over the long term, the following circuit design guidelines are used wherever practical, starting with those identified as Worst Performing Circuits (“WPCs”):

- Provide three-phase line ties that will support the transfer of all but approximately 500-750 customers for 100% of the year.
- Provide sectionalizing devices to limit customer count to no more than approximately 500-750 customers between devices.
- Limit customer count to less than approximately 1,500 customers per circuit.
- Limit line length to approximately 70 circuit miles

Prioritization utilizing these design criteria is based on the greatest expected improvement in reliability for the entire system.

Several other mitigation initiatives have been undertaken to reduce the forecasted short-term equipment failure growth rate.

- **Enhanced Pole Inspection/Treatment Program:** Beginning in 2021, the Company’s wood pole inspection and treatment program was enhanced from a subjective inspection process to an objective, resistance drill-based methodology. The resistance drill inspection allows a complete pole health assessment, with both interior and exterior decay accurately measured. This holistic strength assessment of the pole is the most accurate and thorough pole inspection possible. As an integral part of the twelve-year pole inspection process, PPL Electric observes, notes, and reports at-risk conditions of all pole attachments, specifically crossarms, braces, conductors, transformers, fuse cutouts, lightning arresters, reclosers, regulators, capacitors, switches, wildlife protection, vegetation encroachment, guys, anchors, ground wires, and ground rods.
- **Increased Utilization of Infrared Inspections:** PPL Electric conducted a trial of infrared inspections of multi-phase lines in 2006. The trial inspections cost \$122,500 and identified repairs costing \$100,000, saving an estimated 1,460,000-2,600,000 Customer Minutes Interrupted (“CMI”). Funding of infrared inspections and repairs was increased significantly during 2010 and has remained at a higher funding level. Infrared inspections occur on all 3-phase and 2-phase overhead lines adjacent to roadways every two years.
- **Proactive Circuit Analysis (“PCA”):** PCAs are performed on each circuit on a four-year cycle. The review analyzes and addresses both operational and reliability characteristics of each circuit. Voltage support, phase balancing, protection coordination, power factor maintenance and loading issues are

PPL Electric Utilities Corporation

addressed from an operational perspective. Service outage analysis, exposure analysis, and field checks address reliability and power quality.

- **Distribution Automation Strategy:** In 2010, PPL Electric launched a “smart grid” pilot project that enables the Company to react rapidly to changes on the delivery system, and to automatically re-route power around problems that occur. The project initially focused on the Harrisburg, Pa. area, but has since been expanded to cover all of the Company’s service territory. The project included the implementation of an advanced Distribution Management Systems (“DMS”), which was a breakthrough technology that enables the Company’s operators to see the status of PPL Electric’s distribution network in real-time. In 2016, PPL Electric completed a system wide rollout of Fault Isolation and Service Restoration (“FISR”) technology. FISR identifies faulted sections and quickly develops an optimized restoration plan, then automatically executes that plan. Customers typically can be restored within five minutes from the start of the outage. This milestone is an industry first and has saved over one million customer interruptions to date. Over 8,600 automated smart devices have been installed, which has allowed for remote operation and monitoring of circuit sectionalizing equipment.

Although these programs have successfully slowed failure growth rates in the short-term, PPL Electric faces a long-term issue regarding aging infrastructure. The surge in electrical construction in the 1960’s and 1970’s has resulted in a large number of assets that have reached or are nearing the end of their useful lifetime. Consequently, in 2008-2009, PPL Electric conducted a major condition assessment and maintenance study of its distribution system. The result was the implementation of the Asset Optimization Strategy (“AOS”). The study found that programmatic and accelerated replacement of infrastructure would be the most cost-effective strategy to address aging infrastructure and ensure system reliability and integrity.

Asset Optimization Strategy

The purpose of the AOS study was to develop a strategy for accelerated capital replacement improvements that would combat the anticipated effects of aging infrastructure and bolster PPL Electric’s ability to effectively maintain reliable electric service. With the Company entering a period where a significant number of assets are expected to reach the end of life, a plan was developed to intelligently replace assets prior to an unplanned failure that impacts customers. The plan includes replacements in kind, as well as upgrades to current standards.

Examples of AOS Projects include proactive replacement of substation equipment, Low Tension Network (“LTN”) equipment, and vintage underground cable based on condition-based health analysis.

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Accelerated Investment

As a result of the AOS study, PPL Electric approximately doubled its level of investment in DSIC-eligible property from 2009-2012. During this period, non-storm equipment failures fluctuated but continued to show a slight upward trend. PPL Electric continued to accelerate capital investments during the periods 2013-2017 and 2018-2022 to address an upward trend in equipment failures that peaked in 2018-2019 (see figure 3 above).

Period	Avg Annual Capital investment (in millions)
2008-2012	\$88
2013-2017	\$137
2018-2022	\$180

Figure 4: Approximate average annual capital investment in millions. Not adjusted for inflation.

As a result of these investments, PPL Electric arrested the increase in failed equipment and the current trend is flat to mildly decreasing. Even with these investments, the average age of equipment increased slightly since the 2018-2022 plan. While projected spending under this proposed LTIIIP is lower than the 2018-2022 period, continued capital investment is necessary to maintain or improve the recently flattened trend in equipment failure.

Implementation of Long-Term Infrastructure Improvement Plan

The Long-Term Infrastructure Improvement Plan, in addition to various other prudent capital investments, helps to ensure the safety and reliability of the distribution system. The investments since the LTIIIP was initially put into place have arrested and reversed the growth trend in equipment failures. Equipment failure trends and asset-specific contributions to system-level reliability metrics are analyzed on an ongoing basis to ensure funding is invested appropriately.

PPL Electric routinely reviews the effectiveness of programs to ensure cost-effective investment. Program/project impact on SAIDI and SAIFI, in addition to potential reductions in outage response costs, is compared to the overall program/project costs. PPL Electric utilizes a project prioritization process that defines the cost-effectiveness of programs/projects to ensure effective optimization of reliability investments. PPL Electric currently is improving the use of ongoing asset health indices to further refine asset replacement criteria.

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Ongoing review of the effectiveness of investments to address equipment failure trends will likely result in adjustments to the strategy over time. Future Long Term Infrastructure Improvement Plans will reflect such adjustments. Additionally, work plans may fluctuate throughout a given year due to the need to reallocate resources in response to changing business needs. Some examples include shifting resources for storm response activities, project construction delays caused by a backlog of material deliveries, and the redirection of investment to cure costly equipment failures. In addition, during the project engineering phase, issues such as right-of-way requirements and environmental considerations can result in scope changes that also can delay actual construction. During construction of larger projects, additional scope needs can be identified, creating the need to defer other projects. Finally, reliability metric performance can result in redirection of spending to help ensure the ability to meet targets.

Projected expenditures for the replacement of failed equipment are based on a review of historical trends while considering current failure rates and proactive mitigating measures. For such programs, it is difficult to project the specific scope and location. Therefore, PPL Electric has provided only planned expenditures based on historical trending information.

Utility Outreach

PPL Electric continues to remain engaged, seeking out opportunities with other utilities and government officials on the planning and execution of future construction projects. A forum exists with the Utility Highway Liaison Committee (“UHLC”), with whom PennDOT, the Turnpike Commission, other utilities, and the Energy Association of Pennsylvania meet quarterly to discuss policy issues, present and future projects, and relocation projects. The Company is a regular participant. Initiatives at these forums are focused primarily on improving state and utility interactions.

PPL Electric also participates in various Pennsylvania Coordinating Committees, including the Northeast PA (“NEPA”) Regional partnership, the Lancaster County Regional Partnership, the Lehigh Valley Regional Partnership, and the Lycoming County Area Coordinating Committee. These meetings are held monthly, bi-monthly, or quarterly to discuss and share project plans with stakeholders including utility companies, PennDOT, public works officials and planning commission members. PPL Electric currently hosts two of these meetings each calendar year.

Utilization of a Qualified Work Force

PPL Electric Workforce

As a measure to ensure the use of a qualified workforce, PPL Electric has adopted the definition of a Qualified Electrical Worker from the Occupational Safety and Health Administration (“OSHA”) Regulation 29 CFR § 1910.269 Electrical Power Generation, Transmission and Distribution, which is defined in the PPL Electric Safety Rule Book and is provided to each employee. It is also incorporated into the training and qualification process for all electrical workers.

PPL Electric administers a rigorous, formal training and evaluation process for all qualified electrical workers. Training is required before an employee may perform work independently on exposed, energized electrical equipment greater than 50 volts. Training requirements and programs are unique to the job classification and work being performed. Curriculum documents, outlining subject areas and training durations by job classification have been developed. Training may require up to 5 years to complete and incremental qualifications, following

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assessment, are identified throughout the duration of the training program. Retraining is conducted on a periodic basis as required by OSHA or more frequently when determined necessary.

PPL Electric's formal training programs are administered by the Technical Development & Improvement ("TD&I") group. The training section of the TD&I group is comprised of approximately 37 full time employees, both training professionals and craft employees. Experienced training professionals lead the design and development of the training programs with input from subject matter expertise provided by craft employees from the field. Training program (curriculum) content is approved by a curriculum committee which is comprised of business line managers. The basic job requirement for an instructor includes 5-years of experience performing the work and attainment of Journeyman level (or equivalent) qualifications. Craft instructors are then trained and mentored. Training delivery is governed by PPL Electric policies and procedures to ensure quality and consistency.

Training is delivered in phases. A phase typically consists of a grouping of training modules into one training period of several days to several weeks. Training consists of both classroom and field work to gain hands-on practical learning experience. Trainees are evaluated throughout the program. Evaluation includes written examination and/or a performance examination. Employees must successfully complete each training module before progressing to the next phase of training.

In addition, trainees in key programs must complete an additional skills assessment prior to advancement to the next step. These assessments are coordinated by the TD&I group. The employees are evaluated (graded) by a panel comprised of knowledgeable field supervisors and experienced bargaining unit craft members. This independent evaluation serves as a quality control check on the TD&I training section.

Over the next 5 years, PPL Electric will be executing a resource strategy which includes formal training classes to hire and train new employees in preparation for upcoming attrition.

Contractor Workforce

PPL Electric's Sourcing department administers a standard process for soliciting contractors to perform work identified to be completed by independent contractors. The process includes issuance of a Request for Proposal ("RFP") to various contractors. That process includes a meeting to review the technical and administrative components of the work and normally a walk-down of the project area. Responses to the RFP are evaluated based on detailed financial and technical schedules that compare respondents' capabilities. Part of the RFP evaluation process includes evaluating the qualification of contractors to perform work (both technical and financial capabilities to meet the contractual commitments, and level of qualification of employees) and may include reference checks if appropriate. Any specific required qualifications of contractors would typically be outlined in the RFP and/or contract (for example: pole installation, permit and tag authorities, line construction by specific voltage, live line work, foundations, directional bore/trenching, underground networks).

Most independent contractors employ personnel through the building trades, which includes Union apprenticeship programs to help ensure that employees are qualified to perform assigned work. (This approach is comparable to PPL Electric's Union labor qualification training program.) Employee qualification programs for non-Union independent contractors are stringently reviewed to assess the contractor's training program, such as on-the-job training and certification programs.

Prior to award, contractors are screened for their safety performance and, if applicable, environmental record. Contractors that do not have an acceptable record receive no further consideration. In the event that a contractor

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working for PPL Electric incurs safety incidents and/or does not take appropriate safety measures, the contractor is terminated and prohibited from performing work for PPL Electric in the future.

PPL Electric has instituted a contractor orientation program that provides new contractors an opportunity to understand company expectations for performing work safely, mindful of public and private landowner considerations and administrative concerns (such as billing). PPL Electric also performs weekly safety and workmanship review meetings with the Company's contractor work force to review safety issues and other relevant topics

PPL Electric sponsors a training program that allows the contractors' employees to become qualified in PPL Electric's permit-and-tag system. Contractor employees who successfully complete the training program can be permit holders on PPL Electric's system.

PPL Electric monitors the contractors' performance through several activities that may include direct job oversight through on-site supervision, monthly scorecards that evaluate such areas as job quality, safety performance, cost, and validating billing activities that meet contractual expectations. If safety concerns are identified at a job site, any person has the ability and express duty to cease work until the concerns have been appropriately addressed, and a safety review team could be assembled to formally request a contractor to respond to safety concern. Safety violations could result in immediate contractor termination.

PPL Electric's Project Construction Supervisors continuously monitor the quality of all contractor work and adherence to PPL Electric's Construction Standards. Where the contractor installs specialized equipment on critical facilities, special Quality Assurance review are performed which may include inspection of grounding, trench, foundations, final grade, structural components, poles/towers, conduits, electrical equipment, primary conductor, wiring, designations, and final completion of the Acceptance of Facilities form). Any failures are described along with description and dates of corrections to resolve the areas of concern before final acceptance of the contractor's quality of work.

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Summary

As a result of the economic expansion and building boom of the 1960's and 1970's, much of PPL Electric's distribution system was constructed 50 or more years ago. As this equipment deteriorates due to age, environmental exposure, and added load, it becomes increasingly critical to plan for the repair, upgrade, and/or replacement of these assets through the initiatives described above. In the absence of these initiatives, the efficiency, safety, and reliability of the electric distribution system is expected to be increasingly compromised. PPL Electric believes that the expenditures for these initiatives constitute a prudent and reasonable investment for managing its distribution assets and that each of the listed programs will successfully achieve one or more of the following benefits:

- Maintaining public and employee safety
- Reducing service outage durations and number of customers affected
- Reducing service outage restoration times
- Reducing service outage locating and repair times
- Controlling service outage repair costs
- Limiting failure-related damages and related costs, and
- Improving/maintaining power quality (voltage, flicker, etc.)

To achieve these results, PPL Electric anticipates the need for the following total capital expenditures over the 2023-2027 period. Note that planned expenditures for certain initiatives can fluctuate yearly due to the various factors identified previously.

	Millions of dollars invested					Total
	2023	2024	2025	2026	2027	
Poles	\$ 17.33	\$ 18.96	\$ 17.33	\$ 17.33	\$ 17.33	\$ 88.28
New Electronic Reclosers	\$ 5.07	\$ 4.69	\$ 4.13	\$ 3.63	\$ -	\$ 17.52
Distribution Animal Guarding	\$ 0.50	\$ 0.50	\$ 0.50	\$ 0.50	\$ 0.50	\$ 2.50
Failed Equipment	\$ 34.77	\$ 34.03	\$ 35.18	\$ 36.64	\$ 36.03	\$ 176.64
Underground Cable Replacement	\$ 0.42	\$ 1.11	\$ 1.67	\$ 1.59	\$ 1.59	\$ 6.37
Low Tension Network Primary Cable, Equipment and Structures	\$ 0.60	\$ 1.54	\$ 0.38	\$ 2.40	\$ 2.40	\$ 7.32
Substation	\$ 3.04	\$ 7.71	\$ 14.05	\$ 13.31	\$ 13.08	\$ 51.19
LTN Upgrades	\$ 3.12	\$ 12.60	\$ 7.63	\$ 8.19	\$ -	\$ 31.54
Reliability	\$ 4.08	\$ 2.00	\$ 2.00	\$ 2.00	\$ 2.00	\$ 12.08
System Reliability Improvement Projects	\$ 12.77	\$ 8.11	\$ 13.79	\$ 17.80	\$ 13.29	\$ 65.76
Unreimbursed Highway Relocations	\$ 6.16	\$ 4.90	\$ 3.92	\$ 2.83	\$ 2.83	\$ 20.64
Protection and Control	\$ 4.70	\$ 6.06	\$ 7.35	\$ 6.83	\$ 6.83	\$ 31.77
Total	\$ 92.56	\$ 102.21	\$ 107.92	\$ 113.05	\$ 95.88	\$ 511.62

Almost all of the aforementioned initiatives take advantage of new technologies that did not exist when the associated assets were originally placed into service, and many of these technologies are very recent innovations. These technologies are expected not only to restore the assets to their original level of performance, but, in many cases, provide performance well beyond what previously was achievable in order to ensure and maintain adequate, efficient, safe, and reliable service.

Some of the initiatives, such as animal guarding, clearly have implied endpoints, where no further opportunities for improvement remain. Others, such as distribution automation, eventually experience diminishing returns over time. Other initiatives, such as pole reinforcement and replacement, will be ongoing. Finally, some programs may

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become obsolete, while new programs may become desirable as a result of the evolution of new technologies. Because of these and other variables, the effectiveness of these programs is reviewed annually, and programs are added, deleted, and/or modified, as necessary, to ensure that the expenditures are providing the desired benefits to customers at a reasonable cost.

Distribution Assets

The following pages detail 5-years projections for Long-Term Infrastructure Improvements initiatives that apply to distribution line assets. These assets include, but are not limited to, the following:

- Structures
 - Poles
 - Crossarms
 - Vaults
 - Manholes
- Overhead Conductors and Hardware
- Underground Cables and Hardware
- Switching Devices
 - Air Break Switches
 - Disconnect Switches
 - Switching Cabinets
- Protective Devices
 - Fuses
 - Reclosers
 - Network Protectors
 - Lightning Arresters
- Transformers
 - Overhead
 - Pad-Mounted
 - Submersible
 - Low Tension Network

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Poles

This category includes the replacement and reinforcement of wood poles to maintain reliability, ensure public safety, and further storm harden the system.

Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$17.33	\$18.96	\$17.33	\$17.33	\$17.33	\$88.28

Distribution Pole Replacements

Program Description and Purpose

Replacement of distribution wood poles identified as non-restorable (cannot be reinforced) during the annual inspect and treat program or during a spot inspection in an effort to improve public and employee safety, as well as service reliability. This program contributes to storm hardening efforts and aims to improve public and employee safety, as well as service reliability, by reducing potential pole failures.

Identification/Justification Process

PPL Electric inspects approximately 75,000 poles per year. Historical data suggests an approximate 8% rejection rate from the population of yearly inspections. Of those poles rejected, 70% are candidates for reinforcement while 30% are candidates for replacement. Replacing rejected poles avoids property damage and risk of accidental injury, and it mitigates the costs associated with extended service outages. Replacement rates are expected to fall as a result of PPL Electric's pole treatment program. The average age of an in-service wooden distribution pole is 43 years.

Scope

The scope of the program is a direct correlation to the number of wood pole inspections.

Planned Replacements in Units					
2023	2024	2025	2026	2027	Total Scope
2000-2500	2000-2500	2000-2500	2000-2500	2000-2500	10000-12500

Locations

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Specific locations are a direct correlation to the wood pole inspection plan. Inspection locations are identified yearly primarily as a function of previous inspection dates, as well as ensuring cost-effectiveness of the program and minimizing inspection crew movements.

Pole Reinforcements

Program Description and Purpose

Reinforcement of deteriorated distribution wood poles in order to restore the pole’s original strength, ensure public safety, and maintain reliable electric service through the reduction of potential pole failures. This program contributes to storm hardening efforts by reducing potential pole failures.

Identification/Justification Process

PPL Electric inspects approximately 75,000 poles per year. Historical data suggests an approximate 8% rejection rate from the population of yearly inspections. Of those poles rejected, 70% are candidates for reinforcement. When applicable, this method achieves a significant savings over pole replacement.

Scope

Planned Reinforcements in Units					
2023	2024	2025	2026	2027	Total Scope
4000-5000	4000-5000	4000-5000	4000-5000	4000-5000	20000-25000

Locations

Locations identified for reinforcement are a direct correlation to the number of wood pole inspections.

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New Electronic Reclosers

Program Description and Purpose

Proactive installation of new electronic reclosers on both single-phase and three-phase lines, to improve reliability performance by increasing circuit sectionalizing ability. Reclosers minimize the number of customers affected by a sustained outage.

Identification/Justification Process

Locations are requested by regional reliability engineers and prioritized annually based on anticipated reliability savings. A gradual scope reduction is assumed in the outer years as a result of saturation of reclosers and other distribution automation equipment.

Scope

Planned Installations in Units					
2023	2024	2025	2026	2027	Total Scope
210-250	170-200	110-140	50-70	0	540-660

Locations (Approximate total over 5-year plan)

Region	Units
Lehigh	90-110
Northeast	90-110
Central	90-110
Susquehanna	90-110
Harrisburg	90-110
Lancaster	90-110

Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$5.07	\$4.69	\$4.13	\$3.63	\$0	\$17.52

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Distribution Animal Guarding

Program Description and Purpose

Proactive installation of animal guards on existing distribution overhead transformers and air break switches to improve circuit reliability. Animal guards help prevent animal-related contacts which cause service interruptions.

Identification/Justification Process

Transformers are identified both by opportunistic installation of guarding during other non-related work, and by on-the-spot or follow-up orders after responding to animal-caused outages.

Scope

Planned Animal Guards					
2023	2024	2025	2026	2027	Total Scope
240-360	240-360	240-360	240-360	240-360	1200-1800

Locations (Approximate total over 5-year plan)

Region	Units
Lehigh	200-300
Northeast	200-300
Central	200-300
Susquehanna	200-300
Harrisburg	200-300
Lancaster	200-300

Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$0.50	\$0.50	\$0.50	\$0.50	\$0.50	\$2.50

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Failed Equipment

This category includes the replacement of failed or deteriorated distribution equipment, LTN equipment, underground cable, and underground getaways.

Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$34.77	\$34.03	\$35.18	\$36.64	\$36.03	\$176.64

Distribution Failed Equipment

Program Description and Purpose

Replacement or repair of failed or deteriorated capital units of distribution equipment, excluding underground cable, in order to maintain adequate service reliability.

Identification/Justification Process

Candidates are identified via inspections, both planned and ad-hoc, as well as actual outages and power service problems. Budget allocations are based on historical trends of hours charged to corrective work, in addition to projected trends of future equipment failures. Examples include, but are not limited to, failed reclosers, poles, capacitor banks, and air breaks.

Scope & Locations

Scope and locations are determined as equipment fails.

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Replace Failed Underground Cable

Program Description and Purpose

Replacement of failed underground residential primary and secondary cables in order to maintain adequate service reliability.

Identification/Justification Process

Candidates are identified via actual failures. Budget recommendations are based on historical trends of hours charged to corrective work, in addition to projected trends of future equipment failures.

Scope & Locations

Scope and locations are determined as cable fails.

Replace Failed 12 kV Underground Getaway Cables

Program Description and Purpose

Replacement of failed 12 kV underground getaway cables to maintain adequate service reliability. Getaway failures can result in long duration outages. Getaway cables connect substations to outgoing feeders beyond the substation perimeter.

Identification/Justification Process

Candidates are identified via actual failures and cables with poor test results. Budget recommendations are based on historical trends in getaway failure quantities and costs, in addition to projected trends of future getaway failures based on asset health metrics.

Scope & Locations

Scope and locations are determined as getaway cables fail while in service or fail conditionally under testing.

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Replace Deteriorated/Failed Low Tension Network Equipment and Structures

Program Description and Purpose

Replacement or repair of deteriorated and failed equipment related to Low-Tension Networks, including network transformers, network protectors, manholes, and vault tops in order to maintain adequate service reliability. Low-Tension Networks are low voltage underground distribution facilities found in urban areas.

Identification/Justification Process

Candidates are identified via actual failures, inspections, testing, or work on the system. Budget recommendations are based on historical trends of corrective work, in addition to projected trends of future equipment failures.

Scope & Locations

Scope and locations are determined as assets fail.

Replace Deteriorated/Failed Area Supply Substation Equipment

Program Description and Purpose

Replacement of failed or deteriorated station facilities at area supply substations with in-kind equipment to maintain safe and reliable service. Identified facilities include, but are not limited to, circuit breakers, power transformers, tie/transfer cables, disconnect switches, DC equipment, and instrument transformers.

Identification/Justification Process

Candidates are identified via actual failures, inspections, and test results. Budget recommendations are based on historical trends in equipment failure quantities and costs, in addition to projected trends of future equipment failures based on asset health metrics.

Scope & Locations

Scope and locations are determined as station equipment fail while in service or fail conditionally under testing.

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Underground Cable Replacement

Program Description and Purpose

Programmatic replacement of deteriorated underground cable to maintain reliable electric service.

Identification/Justification Process

Candidates are selected based on history of cable failures and failure risk scores generated by a data analytics model that uses criteria such as segment length, cable age, customer count, and number of tap fuse outages.

Regional allocation of cable remediation is based on historical regional percent contribution to system-wide cable failures.

Scope

Planned Scope in Cable Segments					
2023	2024	2025	2026	2027	Total Scope
25-100	75-150	135-225	100-200	100-200	435-875

Locations (Approximate total over 5-year plan)

Region	Units
Lehigh	100-200
Northeast	45-125
Central	45-100
Susquehanna	45-100
Harrisburg	100-175
Lancaster	100-175

Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$0.42	\$1.11	\$1.67	\$1.59	\$1.59	\$6.37

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Low Tension Network Primary Cable, Equipment and Structures

Program Description and Purpose

Programmatic replacement of deteriorated equipment related to Low Tension Networks, including primary underground cable, network transformers, network protectors, manholes, and vault tops. The purpose of this program is to ensure public safety and service reliability through the replacement of underground facilities that have reached the end of their expected life or that show signs of premature age from prolonged exposure to corrosive environments.

Identification/Justification Process

Primary underground cables for Low Tension Network feeders are reaching their end of useful life and proactive replacements mitigate feeder outages. Replacement and repairs of manhole and vault tops are determined by regular inspections. Network transformer and network protector replacements are determined through inspection and age, where assets exceeding 40 years in service are considered highest priority.

Scope

Planned Replacements in Units (in Work Orders)						
	2023	2024	2025	2026	2027	Total Scope
Primary Cable Replacements	0-2	0-2	0-2	0-3	0-3	0-12
LTN Equipment	6-18	6-18	6-18	6-18	6-18	30-90

Locations (Approximate total over 5-year plan)

Region	LTN Equipment	Cable
Lehigh	5-15	0-2
Northeast	5-15	0-2
Central	5-15	0-2
Susquehanna	5-15	0-2
Harrisburg	5-15	0-2
Lancaster	5-15	0-2

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Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$0.60	\$1.54	\$0.38	\$2.40	\$2.40	\$7.32

Substation

This category includes replacement of various substation assets, and substation animal guarding.

Substation assets include, but are not limited to, the following:

- Structures
 - Enclosures
 - Fences
- Overhead Conductors and Hardware
- Underground Cables and Hardware
- Switching Devices
 - Air Break Switches
 - Disconnect Switches
- Protective Devices
 - Circuit Breakers
 - Fuses
 - Reclosers
 - Lightning Arresters
- Transformers
 - Power
 - Station Service
 - Instrument

Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$3.04	\$7.71	\$14.05	\$13.31	\$13.08	\$51.19

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Underground Getaway Cable Replacements and Life Extension

Program Description and Purpose

Proactive replacement of aging and deteriorating 12 kV underground getaway cables to prevent failures that can result in long duration outages.

Identification/Justification Process

Getaways are selected for proactive replacement based on data analytics risk models that quantify cable health and risk and provide a priority ranking based on risk factors such as age, repair history, installation type, length, load transferability, etc. Scope is additionally identified through inspection feedback and other work.

Scope

Planned Replacements in Units					
2023	2024	2025	2026	2027	Total Scope
0-4	5-12	8-15	8-15	8-15	29-61

Locations (Approximate total over 5-year plan)

Region	Units
Lehigh	0-7
Northeast	12-17
Central	4-5
Susquehanna	2-7
Harrisburg	10-22
Lancaster	1-3

Miscellaneous Substation Equipment

Program Description and Purpose

Programmatic replacement of older substation equipment, including air break switches, potential transformers (“PTs”), capacitance-coupled voltage transformers (“CCVTs”), circuit switchers, lightning arresters, voltage regulators, and DC panels in order to prevent future maintenance concerns and to maintain reliable service.

Identification/Justification Process

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Candidates for replacement are identified based on age and/or operating condition, both indicators of potential failure. Once identified, replacement of these facilities is coordinated and aligned with the replacement of other assets at the same substation within the five-year planning window.

Scope

Planned Projects					
2023	2024	2025	2026	2027	Total Scope
0-2	4-8	5-9	5-9	5-9	19-37

Locations (Approximate total over 5-year plan)

Region	Projects
Lehigh	3-6
Northeast	4-7
Central	3-6
Susquehanna	3-6
Harrisburg	3-6
Lancaster	3-6

Distribution Substation Circuit Breakers

Program Description and Purpose

Proactive replacement of substation circuit breakers (“CBs”) based on asset health and risk factors produced by data analytics models to maintain reliable service. This program includes the replacement of 12 kV circuit breakers.

Identification/Justification Process

Candidates for replacement are identified based on data analytics risk models that consider age, mis-operation history, repair history, obsolescence, and load transferability. Once identified, replacement of these facilities is coordinated and aligned with the replacement of other assets at the same substation within the five-year planning window. Furthermore, assets with chronic issues and high O&M trails are also factored into the proactive replacement scope.

Scope

Planned Projects					
2023	2024	2025	2026	2027	Total Scope
7-12	22-32	42-62	39-58	39-58	149-222

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Locations (Approximate total over 5-year plan)

Region	Projects
Lehigh	40-50
Northeast	11-21
Central	17-26
Susquehanna	29-34
Harrisburg	29-57
Lancaster	23-34

69/12 kV & 138/12 kV Transformer Replacement

Program Description and Purpose

Proactive replacement of distribution substation transformers based on asset health and risk factors produced by data analytics models to maintain reliable service. This program includes the replacement of 69/12 kV and 138/12 kV transformers.

Identification/Justification Process

Candidates for replacement are identified based on data analytics risk models that consider age, dissolved gas analysis trends/analytics, repair history, obsolescence, and load transferability. Once identified, replacement of these facilities is coordinated and aligned with the replacement of other assets at the same substation within the five-year planning window. Furthermore, assets with chronic issues and high O&M trails are also factored into the proactive replacement scope.

Scope

Planned Projects					
2023	2024	2025	2026	2027	Total Scope
1-2	2-4	4-6	3-5	3-5	13-22

Locations (Approximate total over 5-year plan)

Region	Projects
Lehigh	8-9
Northeast	2-3
Central	1-3
Susquehanna	0-1
Harrisburg	0-2
Lancaster	2-4

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Distribution Substation DC Equipment

Program Description and Purpose

Programmatic replacement of distribution substation DC equipment based on asset health and risk factors produced by data analytics models to maintain reliable service. This program includes the replacement of 24 V, 48 V, and 125 V batteries, chargers, and related equipment.

Identification/Justification Process

Candidates for replacement are identified based on age, operating issues, availability of spare parts, and failure trends. Once identified, replacement of these facilities is coordinated and aligned with the replacement of other assets at the same substation within the five-year planning window. Furthermore, DC assets with chronic issues and high O&M trails are also factored into the proactive replacement scope.

Scope

Planned Projects					
2023	2024	2025	2026	2027	Total Scope
0-1	4-6	6-8	6-8	6-8	22-31

Locations (Approximate total over 5-year plan)

Region	Projects
Lehigh	3-5
Northeast	3-5
Central	3-5
Susquehanna	4-5
Harrisburg	6-7
Lancaster	3-4

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Substation Animal Guarding

Program Description and Purpose

Improvements to existing distribution substation equipment via the proactive installation of animal guards to prevent animal contacts and maintain reliable service. Guarded equipment includes transformer bushings, circuit breakers, fuse/disconnect switches, bus supporting insulators, surge arresters, station service transformers, PTs, and cable terminations. Future investments could be made in pilot products like internal perimeter electric fences for comprehensive rodent deterrents at high animal contact risk locations.

Identification/Justification Process

Distribution substations are regionally prioritized based on historical animal-related service outages (both at the substation and within a 1-mile perimeter), number of customers served, substation load, and transferability. High priority substations are animal guarded first with the lower priority substations guarded in outer years.

Scope

Planned Installations in Units					
2023	2024	2025	2026	2027	Total Scope
0-1	1-3	1-3	1-3	0-1	3-11

Locations (Approximate total over 5-year plan)

Region	Units
Lehigh	2-3
Northeast	0-1
Central	1-2
Susquehanna	0-3
Harrisburg	0-1
Lancaster	0-1

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12 kV Underground Bus Tie & Transfer Cable Replacement

Program Description and Purpose

Proactive replacement of distribution substation underground bus tie and transfer cables based on asset health and risk factors produced by data analytics models to maintain reliable service. This program includes the replacement all 12 kV underground cables within the perimeter of the substation yard.

Identification/Justification Process

Underground bus tie and transfer cables are selected for proactive replacement based on data analytics risk models that quantify cable health and risk, and provide a priority ranking based on factors such as age, repair history, installation type, length, loading, etc. Scope is additionally identified through inspection feedback and other work.

Scope

Planned Projects					
2023	2024	2025	2026	2027	Total Scope
2-4	3-5	4-6	4-6	4-6	17-27

Locations (Approximate total over 5-year plan)

Region	Projects
Lehigh	1-2
Northeast	3-6
Central	7-8
Susquehanna	2-3
Harrisburg	1-3
Lancaster	3-5

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LTN Upgrades

Program Description and Purpose

The purpose of this program is to install remote monitoring and control equipment in all Low Tension Network (“LTN”) vaults, upgrade network devices up to the latest standard, replace vault equipment near its end of useful life, and install telemetry on secondary network cable. These improvements will allow for safer operation of LTNs, reduce maintenance costs, reduce failed equipment requiring replacement, and provide better data for asset planning and investments.

Identification/Justification Process

Rollout of this program began in the Lehigh and Harrisburg regions. By the completion of this program in 2026, all LTN vaults will receive automation.

Scope

Planned Replacements in Units					
2023	2024	2025	2026	2027	Total Scope
21	159	102	195	0	477

Locations (Approximate total over 5-year plan)

Region	Units
Lehigh	62
Northeast	111
Central	80
Susquehanna	33
Harrisburg	97
Lancaster	94

Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$3.12	\$12.60	\$7.63	\$8.19	0	\$31.54

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Reliability

This category includes deployment of Smart Grid devices and distribution circuit upgrades to address reliability issues identified through inspections or various circuit or customer level performance metrics.

Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$4.08	\$2.00	\$2.00	\$2.00	\$2.00	\$12.08

Distribution Reliability Preservation

Program Description and Purpose

Upgrades to the distribution system as justified by regional reliability supervisors to improve reliability. Improvements are targeted towards Worst Performing Circuits (“WPCs”), circuits with a history of customer complaints, or recommendations as a result of PCAs. PCAs are detailed reliability and operational analysis performed on 25% of a region’s distribution circuits per year. Additional work is scoped on the basis of Customers Experiencing Multiple Interruptions (“CEMI”), and Customers Experiencing Multiple Momentary Interruptions (“CEMMI”).

Identification/Justification Process

Projects are identified and submitted for both small and large-scale circuit improvement. These projects are ranked utilizing PPL Electric’s investment prioritization tool to ensure funds are directed towards the most cost-effective projects. The number of projects and locations may vary depending on areas with reliability concerns. Examples include, but are not limited to, installation of fuses, fault indicators, reconductoring of vintage conductor, upgrading conductor to reduce impact of vegetation related service outages, and relocating sections of lines that may be inaccessible or prone to vegetation related service outages.

It should be noted projects vary significantly in size, which can result in material swings in the number of planned projects.

Scope

Planned Projects					
2023	2024	2025	2026	2027	Total Scope
10-25	10-25	10-25	10-25	10-25	50-125

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Locations

Locations are identified based upon emergent reliability needs.

Reliability Preservation Emergent

Program Description and Purpose

Remediation of issues primarily associated with secondary voltage and emergent small-scale customer reliability needs in order to improve reliability.

Identification/Justification Process

Work is identified by line crews, as well as through customer calls, and is completed to avoid potential service outages, power quality concerns and safety issues. Examples include, but are not limited to, modifying capacitance to address voltage concerns, installing fusing to aid in sectionalizing, and replacing transformers to resolve transformer overload. Budget recommendations are based on historical trends of hours charged.

Scope & Locations

Scope and locations are determined as emergent needs arise.

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System Reliability Improvement Projects

Program Description and Purpose

Large-scale improvements to distribution circuits with a history of poor reliability. This program addresses long-term projects, primarily aimed at WPCs. However, other proactive long-term projects with proven reliability benefit are included.

Identification/Justification Process

Each quarter, distribution planners and regional reliability supervisors meet to propose projects to improve WPCs. Projects are approved by distribution planning supervisors and vetted against other projects for scheduling based on historical reliability, potential benefit, and cost. Projects may span multiple years and are listed in the years they are planned to go in service. Scope is expected to increase in outer years as circuits and projects are identified. Examples include, but are not limited to, circuit reconfigurations with new tie lines, new lines and terminals, or the installation of substations for increased reliability.

Additionally, PPL Electric monitors large customer impact outages on a daily basis. A circuit that begins to show reliability deterioration and notable impact on reliability metrics requires a root cause analysis. Such analysis can result in the identification of a long-term project.

Note that the projects vary significantly in size, which can result in material swings in the number of planned projects.

Scope

Planned Projects					
2023	2024	2025	2026	2027	Total Scope
6-12	6-12	6-12	6-12	6-12	30-60

Locations (Approximate total over 5-year plan)

Region	Projects
Lehigh	5-10
Northeast	5-10
Central	5-10
Susquehanna	5-10
Harrisburg	5-10
Lancaster	5-10

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Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$12.77	\$8.11	\$13.79	\$17.80	\$13.29	\$65.76

Unreimbursed Highway Relocations

Program Description and Purpose

Unreimbursed customer requested relocations of PPL Electric distribution facilities in support of highway and bridge projects throughout service territory.

Identification/Justification Process

The customers (project sponsors) include PennDOT, the PA Turnpike Commission, and various counties and municipalities. PPL Electric and the project sponsor execute a reimbursement agreement, and PPL Electric is reimbursed for its work based on the “pole count method,” as defined in PennDOT’s DM-5 manual. Historically, reimbursement for distribution projects is approximately 35%.

To accommodate highway relocations and other municipal projects, approximately 70-120 projects per year are placed in service. PPL Electric typically is notified of distribution relocation work 12 months or less before the start of requested utility relocation activities.

Scope & Locations

Scope and locations are determined as requests are received.

Planned Expenditures (in millions)

PPL Electric’s expenditures to complete highway relocation projects are the net of total expenditures minus the project sponsor’s reimbursements.

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$6.16	\$4.90	\$3.92	\$2.83	\$2.83	\$20.64

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Protection and Control

Program Description and Purpose

Proactive replacement of protection and control equipment to maintain reliable distribution service to customers. Replacement of legacy relays with modern microprocessor relays will also improve fault monitoring and diagnosis processes and will provide added insight into circuit breaker health and risk. Replacement of obsolete Supervisory Control and Data Acquisition (“SCADA”) protocols and equipment will also enable relays to perform properly.

Identification/Justification Process

Candidates for replacement are identified based on obsolescence, availability of vendor support, age, and automation enhancement potential. Once identified, replacement of these facilities is coordinated and aligned with the replacement of other assets at the same substation within the five-year planning window.

Scope

Planned Projects					
2023	2024	2025	2026	2027	Total Scope
2-6	59-89	72-108	67-100	67-100	267-403

Locations (Approximate total over 5-year plan)

Region	Projects
Lehigh	54-81
Northeast	42-64
Central	32-49
Susquehanna	34-51
Harrisburg	51-77
Lancaster	54-81

Planned Expenditures (in millions)

Planned Expenditures					
2023	2024	2025	2026	2027	Total
\$4.70	\$6.06	\$7.35	\$6.83	\$6.83	\$31.77

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Appendix A: Average Age of Major Units of Property

The below chart is a summary of key distribution assets, targeted for planned replacement and proactive installation.

Average Age of Major Units of Distribution Property		
Utility Account	Description	Avg Asset Age
362.0 - Station Equipment	DC Sytem Equipment	18
362.0 - Station Equipment	Substation Animal Guards	10
362.0 - Station Equipment	Power Circuit Breakers	33
362.0 - Station Equipment	Power Transformers	42
362.0 - Station Equipment	Protection and Control Equipment	51
364.4 - Poles and Fixtures	Distribution Wood Poles	43
365.0 - Overhead Conductors, Device	Distribution Animal Guards	7
365.0 - Overhead Conductors, Device	OH Primary Conductor	50
365.0 - Overhead Conductors, Device	Air Break Switches	13
365.0 - Overhead Conductors, Device	Automatic Switches (Primarily OCRs/VCRs)	10
365.0 - Overhead Conductors, Device	Disconnect Switches	35
367 - Underground Conductors	UG Primary Conductor (includes Getaways and Cross Yard Ties)	27
366.0 - Underground Conduit	Equipment Foundation, Man Holes, Transformer Vaults (excl Conduit)	27
368.4 - Submersible or Padmt Type	UG Transformers (include LTN Transformers and Network Protectors)	25

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Appendix B: Asset Contribution to Reliability Metrics

The below table provides a summary of customers interrupted (“CI”) and Customer Minutes Interrupted (“CMI”) by failed component. Note that both transmission and distribution substation outages are included in the Substation component asset type.

Outage Contribution By Component - Equipment Failure Causes - Non Major Events											
Component Asset Type	Component Desc	2017		2018		2019		2020		2021	
		CI	CMI								
Distribution	OH-Capacitor Bank	3,424	108,863	473	94,627	1,216	104,022	490	12,697	1,020	50,662
Distribution	OH-Lightning Arrester	6,301	566,653	8,154	731,871	6,200	712,771	2,702	290,321	2,151	293,442
Distribution	OH-Other Equipment(explain)	3,030	289,973	4,840	465,772	5,175	804,502	6,109	451,306	3,456	313,318
Distribution	OH-Pole/Arms Attachments	52,713	6,524,470	48,513	4,700,495	41,599	4,070,548	35,347	3,959,531	43,737	5,505,965
Distribution	OH-PRI Splices and Connectors	7,454	989,200	13,398	1,040,441	24,195	1,685,455	15,181	980,526	15,620	1,443,678
Distribution	OH-Primary/Neutral	85,443	9,923,218	122,999	15,577,602	110,511	12,776,083	116,882	14,222,141	103,375	13,167,440
Distribution	OH-SEC Splices and Connectors	1,813	134,821	1,497	145,830	1,392	102,066	1,710	151,429	1,690	208,053
Distribution	OH-Secondaries/Services	2,610	274,850	3,592	371,244	3,735	486,804	3,283	370,513	3,369	379,299
Distribution	OH-Switch/Automatic	20,631	1,619,275	24,333	2,167,680	20,436	1,663,225	15,214	1,330,628	25,270	2,014,136
Distribution	OH-Switch/Manual/AB/Disc/OS/LBD	13,402	1,170,281	12,348	1,128,002	5,081	505,950	6,291	401,764	5,692	297,479
Distribution	OH-Tap Fuse/Cutout	6,951	749,227	11,402	1,229,204	8,284	1,133,814	7,764	841,505	7,116	925,719
Distribution	OH-Transformer	5,671	968,793	8,079	1,220,182	9,353	1,197,199	7,292	1,225,848	8,189	1,171,421
Distribution	OH-Transformer Fuse/Cutout	16,744	1,778,312	25,048	2,830,029	19,132	2,096,787	20,863	2,208,699	18,545	2,025,416
Distribution	UG-Elbows	84	31,649	313	58,893	199	49,054	480	274,811	937	212,896
Distribution	UG-Lightning Arrester	61	14,383	97	14,711	98	23,831	120	21,331	76	12,064
Distribution	UG-Load Break Junctions	183	36,227	9	1,069	31	9,845	73	16,468	164	58,516
Distribution	UG-Low Tension Network							5	315		
Distribution	UG-Other Equipment(explain)	17	2,086	819	95,603	154	32,535	1,444	155,257	7	795
Distribution	UG-Pads/Vaults/MHs & Splice Boxes	83	18,854	44	7,021	91	19,727	102	18,971	801	150,036
Distribution	UG-PRI Splices and Connectors	151	28,502	82	16,355	1,666	136,146	343	38,591	791	53,784
Distribution	UG-Primary Cable/Neutral	13,539	2,118,561	21,525	2,962,012	18,980	2,779,215	15,006	2,304,340	12,565	2,377,282
Distribution	UG-Riser Pole Equip & Devices	749	88,313	551	70,197	1,404	115,247	306	41,973	948	131,556
Distribution	UG-SEC Splices and Connectors	40	1,200	22	2,575	40	2,814	2	324	33	1,193
Distribution	UG-Secondaries/Services	292	47,087	393	85,353	260	44,414	310	50,241	377	80,910
Distribution	UG-Switchgear	1,021	146,580	1,589	334,778	2,651	309,998	441	87,554	712	142,733
Distribution	UG-Transformer/Transformer Fuse	1,455	254,990	2,735	578,648	1,326	358,322	1,041	232,250	2,915	336,981
Substation	SUB-Circuit Breaker	10,859	1,162,641	6,129	217,364	5,658	605,760	28,289	1,766,321	9,349	202,774
Substation	SUB-Control/Relay	1,950	143,054			26,241	464,478			730	9,127
Substation	SUB-Insulator	84	4,990			5	3,312			3,539	31,055
Substation	SUB-Lightning Arrester					583	99,422				
Substation	SUB-Other Equipment(Explain)							35,104	366,321	499	14,436
Substation	SUB-Power Fuse							2,823	26,593	67	355
Substation	SUB-Switch/Automatic			1,340	14,843						
Substation	SUB-Switch/Manual/AB/Disc/LBD	654	54,045	3,353	82,506	1	1,014	22,157	486,661	4	1,982
Substation	SUB-Transformer	13	2,320	1,449	11,606	5,980	72,007	7,719	118,942		
Total		257,422	29,253,418	325,126	36,256,511	321,677	32,466,367	354,893	32,454,169	273,744	31,614,503

VERIFICATION

I, STEVEN D. SELKREGG, being the Director - Distribution Asset Management & Engineering at PPL Services Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 09/01/2022

Steven Selkregg
Steven Selkregg (Sep 1, 2022 15:14 EDT)

Steven D. Selkregg