



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

IN REPLY PLEASE  
REFER TO OUR FILE

December 15, 2022

Docket No. M-2009-2094773

NATHAN JOHNSON  
SENIOR DIRECTOR, ENGINEERING & OPERATIONS  
CITIZENS' ELECTRIC COMPANY  
1775 INDUSTRIAL BLVD  
LEWISBURG PA 17837-0551  
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**Re: Biennial Inspection, Maintenance, Repair and Replacement Plan (2024-2025)  
Docket No. M-2009-2094773**

Dear Mr. Johnson:

On October 28, 2022, Citizens' Electric Company (Citizens') 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, 2024.

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 Citizens' as one of six (6) EDCs in Compliance Group 2 to initially file its Plan by October 1, 2010, and then every two years thereafter. The Plan must cover the two calendar years beginning 15 months after filing and remain in effect for two calendar years thereafter (January 1, 2024, through December 31, 2025).

Citizens' has proposed a change to its original plan, which will be discussed herein.

**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.*

Citizens' Plan generally complies with Section 57.198(b).

## **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.*

Citizens' has proposed a modification, discussed *infra*, for its Pole Inspections Program.

## **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 sub52 Pa. Code § (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.*

Citizens' Plan generally complies with Section 57.198(m).

## **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.*

Citizen's 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 Citizens' will visually inspect distribution wood poles on a 10- year cycle. Citizens' included a previously approved exemption from performing pole load calculations as part of pole inspections. Citizens' is hereby granted an exemption from performing load calculations as part of its pole inspection program. However, Citizens shall conduct subsequent assessments of pole strength prior to attachment of non-company facilities.

The Plan is consistent with the previously approved Plan and 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.*

Citizens' 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.*

Citizens' 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.*

Citizens' 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.*

Citizens' 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.*

Citizens' 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.*

Citizens' Plan generally complies with Section 57.198(n)(8).

### **Conclusion**

Upon review of Citizens' Biennial Inspection, Maintenance, Repair and Replacement Plan filed on October 28, 2022, it appears that the filing generally complies to the requirements of 52 Pa. Code § 57.198 and is accepted. Furthermore, as discussed *supra*, the exemption requested by Citizens' is approved. This approval is 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 2 calendar years, beginning January 1, 2024. Citizens' may, however, request Commission approval of subsequent revisions to its approved Plan, in accordance with 52 Pa. Code § 57.198(l). Revisions must be submitted to the Commission as an addendum to Citizens' 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 Harry R. Bidelspach, Electrical Reliability Engineer, Bureau of Technical Utility Services at (717) 425-7401, or [hbidelspac@pa.gov](mailto:hbidelspac@pa.gov).

Sincerely,

A handwritten signature in black ink, reading "Rosemary Chiavetta". The signature is written in a cursive, flowing style with a large initial "R".

Rosemary Chiavetta  
Secretary

cc: Kriss Brown, LAW  
John Van Zant, TUS  
Dan Searfoorce, TUS  
Harry Bidelspach, TUS  
Brent Killian, BIE