



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

IN REPLY PLEASE
REFER TO OUR FILE

November 2, 2023

Docket No. M-2009-2094773

ERIC SORBER
VP & GM UGI UTILITIES INC
UGI CORPORATION
460 NORTH GULPH ROAD
KING OF PRUSSIA, PA 19406
esorber@ugi.com

Re: UGI Utilities, Inc. – Electric Division’s Biennial Inspection, Maintenance, Repair and Replacement Plan (2025 through 2026) Docket No. M-2009-2094773

Dear Mr. Sorber:

On September 29, 2023, UGI Utilities, Inc. – Electric Division (UGI-ED) filed their Biennial Inspection, Maintenance, Repair, and Replacement Plan (Plan); pursuant to 52 Pa. Code § 57.198(a), to be made effective on January 1, 2025.

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 UGI-ED as one of five EDCs in Compliance Group 1 which must file their eight biennial Plan by October 1, 2023. The Plan must cover the two calendar years beginning 15 months after filing and remain in effect for two calendar years thereafter (January 1, 2025, through December 31, 2026).

UGI-ED’s Plan is consistent with its previously approved plan for 2023 through 2024 and proposes no substantive changes.

Plan Consistency

52 Pa. Code § 57.198(b) Plan consistency. The plan must be consistent with the National Electrical Safety Code, Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission Regulations, and provisions of the American National Standards Institute, Inc.

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

Time Frames

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

UGI-ED has proposed a modification, discussed *infra*, for its Pole Inspections programs.

Record Keeping

52 Pa. Code § 57.198(m) Recordkeeping. An EDC shall maintain records of its inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair, and replacement programs as required by subsection (n). The records shall be made available to the Commission upon request within 30 days. Examples of sufficient records include:

- (1) Date-stamped records signed by EDC staff who performed the tasks related to inspection.*
- (2) Maintenance, repair, and replacement receipts from independent contractors showing when and what type of inspection, maintenance, repair, or replacement work was done.*

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

Vegetation Management

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

The Plan states that UGI-ED will perform a vegetation management inspection cycle on all its primary overhead distribution facilities every two years in conjunction with its distribution overhead line inspection. For 2025 and 2026, UGI-ED plans to perform vegetation maintenance trimming work on 150-200 miles of distribution overhead lines each year. The actual treatment cycles range from four to eight years.

UGI-ED'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 UGI-ED will inspect all distribution poles on a 10 to 12-year cycle. The purpose of these inspections is to maintain system reliability and safety by ensuring that all poles meet or exceed minimum strength requirements to support their attached facilities, that the poles and associated attachments are free from damage, and that no environmental conditions exist that may compromise the poles and associated attachments.

All poles will be inspected for decay, damage, illegal attachments, and potential hazards associated with electrical equipment. Poles suspected of having internal decay will be inspected by the sound and bore method. Poles manufactured greater than 20 years before the inspection date will be physically inspected below-ground level. The remaining strength of the pole will be calculated using data gathered from the inspection. If the remaining strength of the pole is found to be deficient, the pole will be classified as a reject pole, a re-enforceable reject pole, or a danger pole.

UGI-ED is requesting a continuing exemption from pole loading calculations under Section 57.198(n)(2)(vi) due to its construction standards that, at a minimum, require the use of a Class 3, 40-foot pole for primary construction, and more typically a Class 2, 45-foot pole based on the need for additional pole space. UGI-ED notes that a review of its interruption data from December 2019 through June 2021 identified only three (3) pole failures which contributed just 0.002% of the total customer minutes interrupted for the period. UGI-ED avers that the inclusion of pole loading calculations would result in a significant cost increase relative to the inspection and maintenance program without an appreciable increase in reliability.

Therefore, UGI-ED's request for a continuing exemption is granted. However, UGI-ED shall conduct subsequent assessments of pole strength prior to attachment of non-company facilities.

UGI-ED's generally complies with Section 57.198(n)(2).

Pole Inspection Failure

52. Pa. Code § 57.198(n)(3) Pole inspection failure. If a pole fails the groundline inspection and shows dangerous conditions that are an immediate risk to public or employee safety or conditions affecting the integrity of the circuit, the pole shall be replaced within 30 days of the date of inspection.

The Plan notes that pole inspections that result in a Section 57.198(n)(3) determination are brought to the attention of UGI-ED's program administrator and prioritized accordingly. UGI-ED replaces these poles within 30 days of the date of inspection. Poles classified as rejects, that are not considered an immediate priority, are scheduled for replacement based on criticality. UGI-ED notes that it has seen an increase in pole reject rates in recent years, which has resulted in an accelerated pole replacement program under the UGI-ED Long-Term Infrastructure Improvement Plan ("LTIIIP").

UGI-ED's 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.*

The Plan states that UGI-ED inspects its overhead distribution facilities by ground patrol every two years. The purpose of the inspection program is to verify that the overhead facilities are in a safe, operational, and reliable condition. The inspections are performed by qualified UGI-ED representatives or approved contractors. The overhead lines and equipment are inspected for damage including broken insulators, failed cross-arms, leaks, and any other conditions which may adversely affect the distribution system. Inspection information is documented and forwarded to the appropriate engineering department when corrective action is required.

UGI-ED's Plan generally complies with Section 57.198(n)(4).

Inspection Failure

52. Pa. Code § 57.198(n)(5) Inspection failure. If critical maintenance problems are found that affect the integrity of the circuits, they shall be repaired or replaced no later than 30 days from discovery.

The Plan states that any deficiencies on UGI-ED's overhead distribution system discovered during the performance of its Distribution Overhead Line Inspections will be addressed based on the severity of the situation. Those items that may affect the integrity of circuits will be repaired or replaced within 30 days of discovery. Safety issues will be addressed immediately.

UGI-ED's 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.*

The Plan states that UGI-ED inspects all its overhead distribution transformers on a two-year cycle as part of the overhead distribution line inspection program.

UGI-ED inspects all its pad-mount and below-ground transformers over a five-year cycle. The purpose of the inspection is to verify that all transformers are safe, operational, and reliable condition. The inspections are performed by qualified UGI-ED representatives or approved contractors. The inspectors look for rust, dents and other evidence of contact, leaking oil, installations of fences and shrubbery that could adversely affect access to and operation of the transformer, unauthorized excavations, or changes in grade near the transformer, and any other conditions which may affect the safety, access to or operation of the transformer.

UGI-ED notes that inspection information is documented and conditions that require follow up are forwarded to the UGI-ED Engineering department for corrective action. Safety related issues are corrected immediately. Other reported problems are handled based on the severity of the situation.

UGI-ED's Plan generally complies with Section 57.198(n)(6).

Recloser Inspections

52. Pa. Code § 57.198(n)(7) Recloser inspections. Three-phase reclosers shall be inspected on a cycle of 8 years or less. Single-phase reclosers shall be inspected as part of the EDC's individual distribution line inspection plan.

The Plan states that all single-phase and three-phase reclosers are inspected annually. A portion of the installations are inspected by an outside contractor as part of the overhead distribution line inspection program. The remaining installations are inspected by UGI-ED personnel.

UGI-ED notes that the purpose of performing the inspections is to ensure continued safe and reliable operation of the reclosers. The inspections are conducted by qualified company or

contractor employees. The inspection checks for physical damage, oil leaks, and any other conditions that could adversely affect the safe and reliable operation of the recloser.

Inspection information is documented and conditions that require follow-up are forwarded to the UGI-ED Engineering department for corrective action. Safety related issues are corrected immediately. Other reported problems are handled based on the severity of the situation.

UGI-ED's 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.

The Plan states that UGI-ED will inspect all its distribution substations on a cycle of five weeks or less. The inspections will be conducted by a qualified company representative. The inspector will walk through each substation noting any physical damage, unsafe conditions, or potential problems with substation equipment, structures, and hardware. Substation fence integrity will be verified along with the posting of "danger" and "no trespassing" signs. The purpose of substation inspections is to ensure continued safe and reliable operation of the substations.

UGI-ED's generally complies with Section 57.198(n)(8).

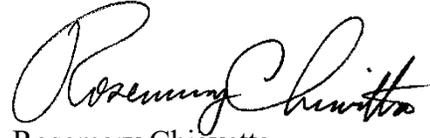
Conclusion

Upon review of UGI-ED's Biennial Inspection, Maintenance, Repair, and Replacement Plan filed on September 30, 2023, it appears that the filing meets the requirements of 52 Pa. Code § 57.198 and is, therefore, accepted. Furthermore, as discussed *supra*, the previously approved exemption requested by UGI-ED may continue. 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 two calendar years, beginning January 1, 2025, through December 31, 2026. UGI-ED may 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 UGI-ED's quarterly reliability report filed pursuant to § 57.195, including prospective and past revisions to its Plan and a justification for the revisions.

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

Sincerely,

A handwritten signature in black ink, reading "Rosemary Chiavetta". The signature is written in a cursive 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