



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
Utility Code: 111250

DANIEL A. GARCIA
ATTORNEY
FIRSTENERGY CORPORATION
800 CABIN HILL DRIVE
GREENSBURG, PA 15601
dagarcia@firstenergycorp.com

RE: Biennial Inspection, Maintenance, Repair and Replacement Plan for West Penn Power Company for the period of January 1, 2025 – December 31, 2026, Docket No. M-2009-2094773

Dear Mr. Garcia:

On September 29, 2023, West Penn Power Company (West Penn) filed its Biennial Inspection, Maintenance, Repair and Replacement Plan (I&M Plan) for the period of January 1, 2025, through December 31, 2026, to the above referenced docket. To assist the Commission in conducting the review of West Penn's I&M Plan, please respond with the information requested in Attachment 1.

Please forward the information to the Secretary of the Commission **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilng with the Secretary of the Commission by opening an efilng account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilng system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission

400 North Street
Harrisburg, PA 17120

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], 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 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).

Signature _____

Title _____

Date _____

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of your response to Harry R. Bidelspach Sr. in the Reliability Section of the Bureau of Technical Utility Services via e-mail at hbidelspac@pa.gov . Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure: Attachment 1

cc: Dan Searfoorce, TUS
John Van Zant, TUS
Harry Bidelspach, TUS
Crystal Kenmuir, FirstEnergy, ckenmuir@firstenergycorp.com

Attachment 1
TUS Data Request
West Penn I&M Plan for the period of January 1, 2025, through December 31, 2026
Docket No. M-2009-2094773

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

1. Reference West Penn's I&M Plan, Vegetation Management Section
 - a. The Commission notes that, as shown in the last three Joint Annual Reliability Reports for the FirstEnergy Companies,¹ which includes West Penn, West Penn's reliability performance has not improved and in the case of CAIDI and SAIDI has worsened over those last three years and both CAIDI and SAIDI are above the 3-Year Standard for 2020, 2021 and 2022. West Penn's CAIDI and SAIDI have been above Benchmark and near or above the 1-Year quarterly Standard for the past 3 years. Provide a detailed explanation of how the proposed four-to-eight-year cycle clearance will improve reliability performance.
 - b. Provide a copy of the vegetation management work practices or procedures, including trimming and herbicide specifications, for West Penn.
2. Reference West Penn's I&M Plan, Distribution Overhead Line Inspections Section
 - a. As noted in 1.a. above, West Penn's reliability performance is not improving. Provide a detailed justification for the continuation of the waiver for Distribution Overhead Line Inspections, given that reliability performance has not improved.
3. Reference West Penn's I&M Plan, Distribution Transformer Inspections Section
 - a. As noted in 1.a. above, West Penn's reliability performance is not improving. Provide a detailed justification for the continuation of the waiver for Distribution Overhead Line Inspections, given that reliability performance has not improved.

¹ All filed to Docket No. M-2016-2522508 and which includes the reliability data for calendar years 2020 through 2022.