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January 30, 2024

VIA ELECTRONIC FILING

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

Re: Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company's Biennial Inspection, Maintenance, Repair and Replacement Plan (2023 through 2024)

Docket No. M-2009-2094773;

LETTER REGARDING *NUNC PRO TUNC* AND EXPEDITED TREATMENT

Dear Secretary Chiavetta,

FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company")¹ respectfully requests that a revision to its approved Biennial Inspection, Maintenance, Repair and Replacement Plans ("Plan") be approved on a *nunc pro tunc* basis and that this request be given expedited treatment to the extent possible to align the Plan to its current operations. The basis for the revisions and the *nunc pro tunc* treatment are described in detail below.

Background

On October 1, 2021, Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power"), and West Penn Power ("West Penn") Company each filed a Plan, pursuant to 52 Pa. Code § 57.198(a), to be made effective on January 1, 2023. By Secretarial Letters dated December 21, 2021, the Pennsylvania Public Utility Commission (the "Commission") issued four letters approving the four Plans finding that the Plans generally complied with the requirements of 52 Pa. Code § 57.198 and also approved certain exemptions to continue.

Requested Revision

¹ By Order entered on December 7, 2023, the Pennsylvania Public Utility Commission (the "Commission") granted certain approvals and certificates of public convenience for the unification of the Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company into one company, FirstEnergy Pennsylvania Electric Company, or "FE PA". *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company*, Docket Nos. A-2023-3038771, et al. (Order entered December 7, 2023).

The Company requests leave to slightly revise its approved pole inspection process such that poles showing signs of decay or poles that are thirty-five years old or older can be manually bored *or* inspected by use of a Resistograph (“Requested Revision”). The currently approved language does not allow for the option to manually bore such poles and only references Resistograph usage. The use of full excavation and manual boring is more effective to inspect the poles and would render use of the Resistograph redundant. Additionally, the Company was previously approved to perform pole treatment for poles older than 10 years in an effort to improve and extend the life of distribution poles. This process enhancement brings the distribution wood pole inspection more in line with the typical guidelines used for transmission wood poles.

Lastly, from an administrative perspective, Requested Revision would align the 2023-2024 Plan with the Company’s 2025-2026 Plan. The Requested Revision language is identical to the pole inspection language that was found to be “generally compli[ant]” with the Commission’s regulations.² As such, approval of the Requested Revision would simply allow the Company to adjust its 2023-2024 Plan such that it is in alignment with that which was already approved for 2025-2026.

A redlined excerpt of the Requested Revision is shown in redline below and in the attached. The attachments are redline and clean versions of page 10 for each of the Plans. The Requested Revision is limited to the below, seen on page 10 of each approved Plan.

In addition to the visual inspection, poles showing incipient decay or poles that are thirty-five years old or older will be manually bored or inspected by the use of a Resistograph. The Resistograph is a sophisticated electronically controlled drill that provides increased accuracy, when compared to manual drilling, in measuring the relative density of wood in timber structures. Driven by a drill motor, a long, thin needle is inserted into the wood pole in order to assess its density, structural integrity, and shell thickness. In 2023, West Penn will continue with the use of the Resistograph. In 2024 and beyond, either manual boring or the Resistograph will be used at Met-Ed’s discretion.

Nunc Pro Tunc and Expedited Treatment

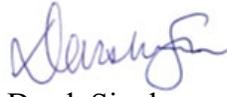
The Company is making this request on a *nunc pro tunc* basis because the Company’s pole inspection program began implementing the above-described optionality as of January 1, 2024 of this year. After an informal discussion with Commission Staff on December 21, 2023, finding the Requested Revision to be generally acceptable, the Company began performing its pole inspections earlier this year. As such, this filing will ensure that the Plan can be updated to reflect the Company’s current practices. Given the fact that this request is being made after the January 1, 2024 implementation date of the Requested Revision, the Company is seeking approval on a *nunc pro tunc* basis pursuant to 52 Pa. Code § 1.15(a). To ensure that such alignment happen as quickly as possible, the Company respectfully requests expedited treatment of this request.

² On September 29, 2023, West Penn, Penelec, Penn Power and Met-Ed each submitted their Plans for 2025-2026 in the above-referenced docket. On December 28, 2023, a Secretarial Letter was issued finding that the majority of the Plans generally complied with 52 Pa. Code § 57.198 - including the pole inspection language at issue here - but asking that the inspection interval for overhead distribution transformer and overhead distribution line be changed from five years to one to two years. As such, FE PA will be submitting one Plan adjusting the overhead distribution transformer inspection interval on or before February 28, 2024.

Secretary Rosemary Chiavetta
January 30, 2024
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Please feel free to contact me if you have any questions.

Sincerely,



Darsh Singh

Enclosures

c: Kriss Brown, LAW (email)
John Van Zant, TUS (email)
Dan Searfoorce, TUS (email)
Harry Bidelspach, TUS (email)
Brent Killian, BIE (email)
Scott R. Wyman, FirstEnergy (email)
Tori L. Giesler, FirstEnergy (email)

Distribution Pole Inspections

Section 57.198(n)(2). Pole Inspections. *Distribution poles shall be inspected at least as often as every 10 – 12 years except for the new southern yellow pine creosoted utility poles which shall be initially inspected within 25 years, then within 12 years annually after the initial inspection. Pole inspections must include:*

- i. Drill tests at and below ground level*
- ii. A shell test*
- iii. Visual inspection for holes or evidence of insect infestation*
- iv. Visual inspection for evidence of unauthorized backfilling or excavation near the pole*
- v. Visual inspection for signs of lightning strikes*
- vi. A load calculation*

Program Description

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

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

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

In addition to the visual inspection, poles showing incipient decay or poles that are thirty-five years old or older will be manually bored or inspected by the use of a Resistograph. The Resistograph is a sophisticated electronically controlled drill that provides increased accuracy, when compared to manual drilling, in measuring the relative density of wood in timber structures. Driven by a drill motor, a long, thin needle is inserted into the wood pole in order to assess its density, structural integrity, and shell thickness. In 2023, Met-Ed will continue with the use of the Resistograph. In 2024 and beyond, either manual boring or the Resistograph will be used at Met-Ed's discretion.

Serviceable poles that pass the visual and sounding testing may be treated for life extension, protection against fungal decay and insects and to interrupt degradation. Serviceable and reinforced poles shall also be treated. The internal preventative pole treatment product is the Cobra™ Rods, a diffusible rod composed of copper and boron. The internal void pole treatment product is the Genics™ CuB, a preservative solution containing copper

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Serviceable poles that pass the visual and sounding testing may be treated for life extension, protection against fungal decay and insects and to interrupt degradation. Serviceable and reinforced poles shall also be treated. The internal preventative pole treatment product is the Cobra™ Rods, a diffusible rod composed of copper and boron. The internal void pole treatment product is the Genics™ CuB, a preservative solution containing copper hydroxide and disodium octaborate

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