



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

IN REPLY PLEASE
REFER TO OUR FILE

April 24, 2024

Docket No. M-2009-2094773

DARSH SINGH, ESQUIRE
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Re: Revised Biennial Inspection, Maintenance, Repair and Replacement Plan for FirstEnergy Pennsylvania Electric Company for the period of January 1, 2025 through December 31, 2026, at Docket No. M-2009-2094773

Dear Ms. Singh:

On April 19, 2024, FirstEnergy Pennsylvania Electric Company (FE PA) filed a revised Biennial Inspection, Maintenance, Repair and Replacement Plan (Revised I&M Plan) with the Pennsylvania Public Utility Commission (Commission) for its four rate districts,¹ pursuant to the directives of the Commission Secretarial Letters served on December 28, 2023 (Dec 28 SLs), at Docket No. M-2009-2094773.² FE PA's Revised I&M Plan reflects adjusted distribution overhead line inspections intervals and distribution overhead transformer inspections intervals consistent with 52 Pa. Code § 57.198(n)(4) and (6) and also incorporated modified language in the vegetation management section, at the recommendation of staff from the Commission's Bureau of Technical Utility Services (TUS Staff).

The Commission's regulations require electric distribution companies (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. FE PA, as an EDC in Compliance Group 1,

¹ By Order entered on December 7, 2023, the Commission granted certain approvals and certificates of public convenience for the unification of the four electric distribution companies (Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company) into one company, FE PA. See, *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*, at Docket Nos. A-2023-3038771, et al.

² The Dec 28 SLs had directed that FE PA file revised I&M Plans within 30 days of service of the Dec 28 SLs. On January 9, 2024, FE PA filed a request seeking a 30-day extension to comply with the directives of the Dec 28 SLs and to file the I&M Plan in a consolidated manner, which was granted pursuant to a Secretarial Letter served on January 11, 2024. On February 28, 2024, FE PA filed a revised I&M Plan, which was a consolidated plan for all four rate districts. Pursuant to discussions with staff from the Commission's Bureau of Technical Utility Services (TUS Staff), FE PA filed the instant Revised I&M Plan on April 19, 2024, that, while still a consolidated plan, provides certain information by rate district, rather than in a consolidated manner.

must file its eighth biennial Plan by October 1, 2023.³ 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). TUS Staff, in accordance with 52 Pa. Code § 57.198(h), has delegated authority to accept or reject I&M Plans.⁴

Plan Revisions

As noted in Footnote 2, above, FE PA filed its Revised I&M Plan as a consolidated plan encompassing all four of its rate districts, rather than four individual plans for the former EDCs. In its Revised I&M Plan, FE PA proposed to change its vegetation management inspection and treatment cycle, and its inspection intervals for its distribution overhead line inspections, overhead distribution transformers, and below-ground transformers. FE PA is also continuing its current I&M Plans' updated distribution wood pole treatment program and pole inspection language. Those pole program changes were approved via Secretarial Letters served on July 17, 2023, and February 5, 2024, both at Docket No. M-2009-2094773.

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.

TUS Staff finds that FE PA's Revised I&M 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.

FE PA has proposed continuation of a previously approved deviation, discussed *infra*, for its pole loading calculations.

FE PA proposed changes, discussed *infra*, to its prescribed schedules for its vegetation management inspection and treatment cycle, and its inspection intervals for its distribution

³ FE PA filed I&M Plans for each of the four former FirstEnergy EDCs on September 29, 2023, at Docket No. M-2009-2094773. Those I&M Plans were rejected pursuant to the Dec 28 SLs.

⁴ The Bureau of Conservation, Economics and Energy Planning was eliminated, and its functions and staff transferred to the Bureau of Technical Utility Services. *See Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Final Procedural Order, entered August 11, 2011, at Docket No. M-2008-2071852, at 4.

overhead line inspections, overhead distribution transformers, and below-ground transformers. The proposed changes all fall within the proscribed time frames of the applicable Public Utility Code and thus FE PA is no longer proposing deviations to those required inspection intervals.

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 sub 52 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.*

TUS Staff finds that FE PA's Revised I&M 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.

FE PA has adopted a four to five year vegetation management cycle, rather than its previous four to eight year cycle. FE PA also indicated that is exploring emerging technologies that may suggest effective vegetation management strategies for circuit and cycle work models through remote sensing and analytics, which could allow for future adjustments to the vegetation management plan by utilizing reliability metrics and circuit system condition to determine appropriate clearance cycle length.

TUS Staff finds that FE PA's Revised I&M 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 FE PA will visually inspect distribution wood poles on a 12-year cycle.

FE PA included a previously approved exemption from performing pole load calculations as part of pole inspections. FE PA noted that pole failures are a very small impact on reliability and that the failures that occurred were aggravated by weather conditions and vegetation being blown into lines. FE PA stipulated that the risk reduction through a load calculation would be insignificant.

Therefore, FE PA is granted exemption from performing load calculations as part of its pole inspection program. However, FE PA shall conduct subsequent assessments of pole strength prior to attachment of non-company facilities.

TUS Staff finds that FE PA's Revised I&M Plan is consistent with the previously approved Plan and 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.

TUS Staff finds that FE PA's Revised I&M 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.*

FE PA's Revised I&M Plan indicated that FE PA's distribution overhead lines and equipment inspection cycles shall be performed on a two-year cycle. FE PA had previously operated on a Commission-approved deviation for a five-year cycle.

TUS Staff finds that FE PA's Revised I&M Plan is consistent with and 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.

TUS Staff finds that FE PA'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.*

FE PA's Revised I&M Plan indicated that FE PA will inspect overhead distribution transformers on a two-year cycle, consistent with its distribution overhead line inspections. FE PA had previously operated on a Commission-approved deviation for a five-year cycle

FE PA's Revised I&M Plan also indicated that FE PA will inspect below-ground transformers and above-ground pad-mount transformers on a five-year cycle. FE PA had previously operated on a five-year inspection cycle for above-ground pad-mount transformers and an eight-year inspection cycle for below-ground transformers.

TUS Staff finds that FE PA's Revised I&M Plan is consistent with and 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.

FE PA visually inspects distribution line reclosers annually. The purpose for inspecting distribution line reclosers is to identify and repair unsafe conditions or conditions that may adversely affect service reliability or system performance, and to comply with the requirements of state regulatory agencies and the National Electric Safety Code (NESC).

TUS Staff finds that FE PA's Revised I&M 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.

FE PA inspects its distribution substations twelve times annually. The purpose of these monthly inspections of the distribution substations is to ensure that any developing substation problems are identified and addressed in a timely manner in support of system reliability and electrical safety.

TUS Staff finds that FE PA's Revised I&M Plan generally complies with Section 57.198(n)(8).

Conclusion

Upon review of FE PA's Revised I&M Plan filed April 19, 2024, it appears the filing generally complies to the requirements of 52 Pa. Code § 57.198 and is accepted. Furthermore, as discussed *supra*, the exemption requested by FE PA 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, 2025. FE PA 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 FE PA'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 John Van Zant, Reliability and Emergency Preparedness Supervisor, TUS, at 717-787-3810, or jvanzant@pa.gov.

Sincerely,



Rosemary Chiavetta
Secretary

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