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Rosemary Chiavetta Esq.
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Docket No C-2024-3049856. Thomas Little v. First Energy PA Electric Co.
Reply to the Answer & New Matter of FE PA (Met Ed Rate District)

Dear Secretary Chiavetta,

I am responding to the July 22nd Answer and New Matter from First Energy (FE) to the above referenced complaint. My previous reply was made without the benefit of information I requested through RTK. The PUC has now provided some information from that RTK request. This reply is supplemental to my prior Reply.

With respect to the New Matter, FE alleges that it provides “adequate, efficient and reasonable service” and is not required to provide “perfect service.” They state further that they are not required to provide the best possible service. In fact, FE has provided unreasonable service. The PUC has repeatedly found that FE and Met-Ed provides service which does not meet established standards, and which is deteriorating.

PUC Secretary Chiavetta sent a letter to FE on 11/2/23 (Docket No.: M-2009-2094773) which is posted on the PUC web site. On page 3, the letter states “The Commission notes that, as shown in the last three Joint Annual Reliability Reports for the First Energy Companies, which includes Met-Ed, Met-Ed’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 12-month rolling quarterly Standard for 2021 and 2022.”

The Met-Ed division of FE was then informed by letter on 12/28/2023 (Docket No. M-2009-2094773 posted on the PUC web site) that, "TUS Staff finds that Met-Ed's reliability performance does not comply with 52 Pa. Code section 57.194(e) (relating to an EDC achieving the reliability performance benchmarks and minimum performance standards established by the Commission)."

That letter provides some data on vegetation caused outages. There were 1,376 such outages in 2004 and 1,502 in 2015 demonstrating a relatively stable pattern. This increased to 1,807 in 2016 and 4,858 in 2022. This represents a 223% increase from 2015 to 2022. This correlates with the Emerald Ash Borer (EAB) infestation resulting in dead Ash trees and distribution line damage. These changing conditions required FE to modify its conditions-based vegetation management plan, to comply with 52 Pa. Code Section 57.198(n).

In a 4/19/24 letter to Secretary Chiavetta concerning Revised Biennial Inspection, maintenance, Repair and Replacement Plan for First Energy Pennsylvania Electric Company for the period of January 1, 2025 – December 31, 2026: Docket No.: M-2009-2094773, FE addresses damage caused by the EAB. FE describes a program to proactively remove ash trees off rights of way in the Met-Ed and West Penn Rate Districts. They also describe a program to address Customers Experiencing Multiple Interruptions (CEMI). FE appears to acknowledge the EAB problem causing power interruptions. Yet I have seen no evidence of FE removing dead Ash trees in my service area. FE has reported power interruptions to my service at a rate of 0.75 interruptions per month in the past 24 months, why hasn't Met-Ed initiated dead tree mitigation using these programs in my community? Williams Township has continued to experience power interruptions since FE issued its Answer in July.

Sincerely,

Thomas Little

CC:

Margaret A. Morris, Esq, Reger Rizzo & Darnall LLP
Melody Ernst, Williams Township
Representative Robert Freeman, Pennsylvania Assembly
Senator Lisa Boscola, Pennsylvania Senate

