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October 15, 2024

BY ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Re: Pike County Light and Power Company's Biennial Inspection, Maintenance,
Repair and Replacement Plan 2026 and 2027; Docket No. M-2009-2094773

Dear Secretary Chiavetta:

Attached is Pike County Light and Power Company's Biennial Inspection, Maintenance,
Repair and Replacement Plan 2026 and 2027.

Should you have any questions concerning this Plan, please contact Ed Verbraak
everbraak@PCLPEG.com.

Very truly yours,

/s/ Whitney E. Snyder

Whitney E. Snyder
Thomas J. Sniscak

WES/das
Enclosure

cc: Dan Searfoorce, TUS (via email, dsearfoorc@pa.gov)
Ed Verbraak, General Manager

Biennial Inspection, Maintenance, Repair and Replacement Plan of Pike County Light & Power Company

For the Period of January 1, 2026 – December 31, 2027

Submitted by:

Edward P. Verbraak
General Manager
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Dated: October 15, 2024

§57.198(N1). Vegetation Management. *The statewide minimum inspection and treatment cycle for vegetation management is between four to eight years for distribution facilities. An EDC shall submit a condition-based plan for vegetation management for its distribution system facilities explaining its treatment cycle.*

Program Description:

Pike County Light & Power Company (“PCL&P” or the “Company”) primarily has two 34.5 kV feeds into the service territory and two main 13.2 kV distribution circuits; the total overhead primary mileage is a little over 100 miles. The circuits are located within Pike County. PCL&P maintains this system on a three and five-year vegetation maintenance cycle. In between the vegetation maintenance cycles, spot vegetation treatment is completed as conditions are identified during investigations or as reported by customers and municipalities or any other entity.

To monitor performance of the vegetation management program, all vegetation caused primary interruptions on PCL&P circuits are tracked via PCLP outage reporting. This allows the PCL&P reliability contractor and General Manager to track the number of individual vegetation interruptions and customers affected to gauge vegetation management performance of the maintained substation. Where appropriate, herbicide treatment of the cut vegetation (cut stump treatment) is completed.

In 2015, the cycle was extended to a five-year cycle, to comply with the rate case settlement decision (Docket No. R -2013-2397237).

Treatment Plan:

The PCL&P distribution vegetation maintenance treatment plan is to maintain the entire system within each five-year period. The two, main 34.5 kV feeds were last completed in 2021-22 and are scheduled to be completed again in 2024-2025.

The two 13.2 kV main distribution circuits were last completed in December 2022 and are scheduled to be completed again in 2027. Hot spot trimming, applying program specifications, was also completed on 116-4-34 for approximately 1,000 feet known as Pinetree Alley and on the 13.2 circuits as needed along Delaware Drive and Heaters Hill.

In 2022, the 13.2 kV laterals along Delaware Drive and Heaters Hill were affected by numerous dead ash tree failures from both within, but also from outside the road right-of-way. In 2023, the Company completed the identification of dead or other potential danger trees and, with the support of the local municipality, private property owners and PennDOT, resulting in the removal of numerous trees.

Additionally, in 2023, the Company performed a clearing operation of ground line and aerial vegetation along the 34.5kv circuit which serves as the back-up to Westfall Township and Milford’s Township and Borough areas.

Vegetation Treatment Cycle:

PCL&P has established a vegetation maintenance treatment cycle of three to five-years for the system. The treatment cycle for each circuit is shown in the table below:

Distribution Vegetation Management	
Circuit	Expected Treatment Cycle
104-1-13	5 years
104-3-13	5 years
116-4-34, 116-2-34, 3-1-34	3 years

Justification

PCL&P's Vegetation Management Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n) (1). No waiver is being requested.

§57.198(n2). 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 inspection 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; and
- (vi) A load calculation.

Program Description

Distribution poles will be inspected on a 12-year cycle. There are 4,340 distribution poles in PCP&L territory. In 2019 thru 20224, 750, 1,046, 0, 880, 0, and 250 (at time of this report) poles respectively were inspected. The 250 in 2024 will complete the cycle.

One component of the PUC approved PCL&P-Electric LTIP in 2021, included pole replacement and storm hardening inspections, budgeted initially for \$600k per year, subsequently modified to \$150k per year. This will be in line with PCLP commencement to transition back to the 12-year inspection cycle by inspecting approximately 350 poles per year.

Since 2017, approximately 376 poles were identified as to be replaced or rehabilitated. All poles are inspected and treated in accordance with specification EO-10345 “Inspection and Ground-line Treatment of Standing Wood Poles”, a copy of which may be obtained from the office of the Company’s General Manager. All poles are visually inspected. Poles older than twelve years are sounded, and then bored if needed and treated. A full excavation is performed if needed and an external treatment applied.

Inspection Plan

12 Year Cycle	Pole Inspections Planned (Number)	
	2026	2027
PCL&P	350	350

Justification

Load calculations are not routinely performed as part of the PCL&P pole inspection program. Design personnel follow PCL&P’s electric distribution standards that utilize load calculations to define classes of poles required for all standard pole-mounted equipment and specify the minimum mounting distance from the pole top for the equipment to be installed on the pole. Adherence to these specifications assures proper pole application and design to handle the routine loads that are installed. If a pole appears to be overloaded or if other than routine equipment is to be added to the pole, the specific pole is evaluated.

PCL&P is requesting a continuation of the waiver for the requirement, set forth in §57.198(n)(2)(vi), to perform load calculations as part of the pole inspections. PCL&P provides design guidance for the proper selection of a pole class to meet the standard load to be installed. Accordingly, a requirement to perform load calculations as part of the pole inspection program is not warranted. PCL&P's Vegetation Management Plan meets all the requirements of 52 Pa Code Chapter 57 §57.198(n)(2)(i) through (v).

§57.198(n3). Pole Inspection Failure. *If a pole fails the ground line 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.*

Program Description

Poles that do not pass an inspection fall into the following four categories: priority reject, reject, priority restorable and restorable. Poles that are determined to be an immediate risk to public or employee safety, or conditions affecting the integrity of the circuit are classified as priority poles and are intended to be replaced within 30 days. The remaining poles identified for replacement are prioritized based on type (mainline, equipment pole, etc.) and are then scheduled for replacement.

Justification

PCL&P's Distribution Pole Inspection Failure Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n) (3). No waiver is being requested.

§57.198(n4) Distribution Overhead Line Inspections. Distribution lines shall be inspected by ground patrol a minimum of once every one to two years. A visual inspection must include checking for:

- (i) Broken insulators;
- (ii) Conditions that may adversely affect operation of the overhead transformer; and
- (iii) Other conditions that may adversely affect operation of the overhead distribution line.

Program Description

PCL&P will conduct inspections of its overhead distribution facilities by ground and/or drone patrols every two years. This first PCLP cycle was completed over 2018 and 2019. The second cycle was completed in 2021-2022. The third cycle of drone inspection was completed in 2024. The purpose of the inspection program is to verify that the overhead facilities are in a safe, operational, and reliable condition. The inspections will be performed by a qualified Company or Contractor representative. The overhead lines and equipment will be inspected for damage including broken insulators and conductors, equipment fluid leaks, rotted or damaged pole tops and cross arms, infrared hot spots and any other conditions which may adversely affect the distribution system. Inspection information will be documented, and corrective action performed.

Inspection Plan

Overhead Line	Circuit	No. of Inspections Planned (Miles)	
		2026	2027
5 circuits (103.00 miles) 2-year cycle	6-8-13	6.81	0
	104-1-13	0	13.14
	104-3-13	0	15.29
	3-1-34	2.350	0
	116-2-34 & 116-4-34	22	42.41

Justification

PCL&P’s Distribution Overhead Line Inspection Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n) (4). No waiver is being requested.

§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.*

Corrective Maintenance

Any deficiencies on PCL&P's overhead distribution system discovered during performance of its distribution overhead line inspections will be addressed based on the severity of the deficiency. Critical maintenance problems that may affect the integrity of circuits will be repaired or replaced within 30 days of discovery. As a result of the 2024 equipment inspection, approximately 31 additional poles were replaced due to rotted pole tops and wildlife damage and approximately 9 overhead transformers replaced.

Justification

PCL&P's Distribution Overhead Line Inspection Failure Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n) (5). No waiver is being requested.

§57 198(n6) Distribution Transformer Inspections. Overhead distribution transformers shall be visually inspected as part of the distribution line inspection everyone to two years. Above-ground pad-mounted transformers shall be inspected at least as often as every five years and below-ground transformers shall be inspected at least as often as every eight 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; and
- (iv) Unauthorized excavation or changes in grade near the transformer.

Program Description

PCL&P will inspect all its overhead distribution transformers on a two-year cycle as part of the drone/overhead distribution line inspection program above.

PCL&P will inspect all its pad-mount transformers on a five-year cycle. There are no below-ground transformers on the Pike system. The purpose of the inspection is to verify that all transformers are in a safe, operational and reliable condition. The inspection will be performed by a qualified Company representative. The inspector will 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.

Inspection information will be documented. Conditions that require corrective actions will be repaired as required by the severity of the deficiency identified.

Inspection Plan

Overhead Transformer	Circuit	No. of Inspections Planned	
		2026	2027
1,398 Total 2-year cycle	6-8-13	57	0
	104-1-13	0	196
	104-3-13	0	246
	116-2-34; 116-4-34; 3-1S-13	296	570
	Met-Ed 83-2	27	0

Pad-mount Transformer	Circuit	No. of Inspections Planned	
		2026	2027
271 Total 5-year cycle	6-8-13	1	0
	104-1-13	9	0
	104-3-13	40	0
	116-4-34	22	22

Justification

PCL&P’s Distribution Transformer Inspection Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n) (6). No waiver is being requested.

§57 198(n) (7). Recloser Inspections. Three phase reclosers shall be inspected on a cycle of eight years or less. Single phase reclosers shall be inspected as part of the EDC's distribution line inspection plan.

Program Description

PCL&P visually inspects all three-phase reclosers annually and performs functional tests every three years. Both annual and 3-year functional tests were completed in 2020 and again 2024. No single phase reclosers are operating on the PCP&L system.

Inspection Plan

Recloser	No. of Inspections Planned	
	2026	2027
Annual	4	0
3-year	0	4

Justification

PCL&P Recloser Inspection Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n) (7). No waiver is being requested.

§57 198(n) (8). Substation Inspections. Substation equipment, structures, and hardware shall be inspected on a cycle of five weeks or less.

Program Description

PCL&P inspects its one substation facility monthly. The purpose of this inspection is to identify abnormalities before they become larger problems. Visual inspections and the collection of counter readings and equipment information has proven to be valuable in predicting the health and integrity of our substation equipment and facilities.

Each month a class #1 inspection is performed as described below:

- Visual inspection of transformer and breakers for oil leaks, oil levels, nitrogen pressure, connections, condition of bushings and Circuit Breaker (“CB”) operating mechanism;
- Visual inspection of battery banks, chargers, control board indicating lights, control house lights, yard lights;
- Visual inspection of minor equipment including Potential Transformers, Current Transformers, Capacitive Coupled Potential Devices disconnect switches and bus connections;
- Visual inspection of all structures, fences and yard surfaces; and
- Counter readings taken of breakers and the tap changer.

Inspection Plan

Substation		No. of Inspections Planned	
		2026	2027
PCL&P	Matamoras	12	12

Justification

PCL&P Substation Inspection Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n) (8). No waiver is being requested.