



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

IN REPLY PLEASE
REFER TO OUR FILE

November 8, 2024

Docket No.: M-2009-2094773
Utility Code: 111100

Kimberly A. Klock
Assistant General Counsel
PPL Electric Utilities Corporation
645 Hamilton Street, Suite 700
Allentown, PA 1810
KKlock@pplweb.com

RE: PPL Electric Utilities Corporation Biennial Inspection, Maintenance, Repair and Replacement Plan for the Period January 1, 2026 - December 31, 2027

Dear Ms. Klock:

On October 1, 2024, PPL Electric Utilities Corporation (PPL) filed its Biennial Inspection, Maintenance, Repair and Replacement Plan (I&M Plan) for the period January 1, 2026, through December 31, 2027. The Commission seeks additional information regarding PPL's deviations from its distribution overhead line inspections and distribution transformer inspections. To assist the Commission in conducting the review of PPL'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 efilings with the Secretary of the Commission by opening an efilings account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings 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:

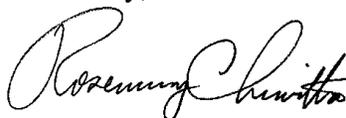
I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made 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 John Van Zant in the Reliability and Emergency Preparedness Section of the Bureau of Technical Utility Services via e-mail at jvanzant@pa.gov. Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure: Attachment 1

cc: Kriss Brown, LAW
Dan Searfoorce, TUS
John Van Zant, TUS
Brent Killian, BIE
Patrick M. Cicero, OCA
NazArah Sabree, OSBA
Preston Walker, PPL, pwalker@pplweb.com

Attachment 1
TUS Data Request 1
PPL Electric Utilities Corporation Biennial Inspection, Maintenance, Repair and Replacement
Plan (I&M Plan) for the Period January 1, 2026 - December 31, 2027
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 PPL's I&M Plan's requested deviations for inspections of distribution overhead lines, overhead distribution transformers and above-ground, pad-mount distribution transformers.

- a. PPL's condition-based criteria for inspection of overhead lines and associated overhead distribution transformers that are not part of multi-phase overhead lines adjacent to roadways, and PPL's circuit performance criteria for above-ground, pad-mount transformers, appears to allow that some equipment may not be visually inspected for several years, if ever.

Given 1.a, above, describe how PPL's requested deviations for inspections of distribution overhead lines, overhead distribution transformers and above-ground, pad-mount distribution transformers comply with the National Electric Safety Code, which requires equipment to be inspected on some periodic basis.