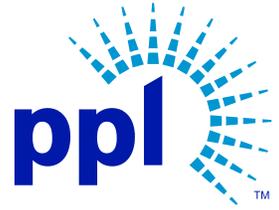


Kimberly A. Klock
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E-FILE

November 22, 2024

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

**Re: PPL Electric Utilities Corporation Biennial Inspection,
Maintenance, Repair and Replacement Plan for the Period
January 1, 2026 – December 31, 2027
Docket No. M-2009-2094773**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation is the response to the Set I data request issued by the Bureau of Technical Utility Services in the above-referenced matter.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on November 22, 2024, which is the date it was filed electronically using the Commission's E-filing system.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kimberly A. Klock". The signature is fluid and cursive, with the first name being the most prominent.

Kimberly A. Klock

Enclosure

cc via email: John Van Zant, TUS
Kriss Brown, LAW
Dan Searfoorce, TUS

Patrick Cicero, OCA
NazAarah Sabree, OSBA
Brent Killian, BIE

**PPL Electric Utilities Corporation
Response to the Set I Data Request of the
Bureau of Technical Utility Services
PPL Electric Utilities Corporation Biennial Inspection, Maintenance, Repair and
Replacement Plan (I&M Plan) for the Period January 1, 2026 – December 31, 2027
M-2009-2094773
Dated November 8, 2024**

TUS I-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 transfers, 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.

PPL The National Electric Safety Code (NESC) Part 2, Section 21, 214.A.2.
Response states that the inspections shall be "at such intervals as experience has shown to be necessary," and "inspections may be performed in a separate operation or while performing other duties."

PPL Electric complies with this NESC requirement through several activities.

First, PPL Electric complies with the NESC requirement through its inspection and maintenance programs for distribution overhead lines, overhead distribution transformers and above-ground, pad-mount distribution transformers as described in the PPL Electric Utilities Corporation Biennial Inspection, Maintenance, Repair and

Replacement Plan for the Period January 1, 2026 – December 31, 2027 (“I&M Plan”).

Additionally, PPL Electric follows the practices set forth below, which are also described in the I&M Plan.

The Proactive Circuit Analysis (PCA) process is outlined on page 6 of the I&M Plan. Twenty-five percent of the Company’s distribution circuits are reviewed as part of this process every year, with a maximum potential interval of 4 years for each circuit. This analysis includes a desktop review of the entire circuit, followed by a field review of specific areas with identified aging infrastructure and/or reliability and power quality concerns. Areas of concern identified through this analysis will be visually inspected by field resources and mitigated. This process is applicable to lines and both above-ground and pad-mount transformers.

Also, as stated on page 17 of the I&M Plan, there are many other processes and practices during day-to-day operations that can trigger condition-based visual inspections through field reviews and patrols. A few examples include:

- Pre and post switching patrols;
- Leveraging AMI data to detect assets near end of life, specifically transformers; and
- Predictive Failure Technology, which will continue to be installed in the next few years on the PPL Electric system. These sensors identify issues, such as those described below, on the line and associated transformers and equipment, which will trigger targeted field reviews. These sensors detect deteriorated equipment, abnormal conditions, vegetation encroachment, etc., prior to an outage occurring. In many cases, these sensors will detect issues that are not easily identifiable through typical visual inspections.

It should be noted that PPL Electric has experienced a decline in outage cases caused by equipment failures under these existing practices, as described above, with the current approved deviations in place. This trend is outlined on pages 9 and 17 of the I&M Plan.

VERIFICATION

I, PRESTON WALKER, being the Director – Transmission Planning & RTO Strategy at PPL Services Corporation, 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 PPL Electric Utilities Corporation 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.

Date: 11/22/2024


Preston Walker (Nov 22, 2024 13:19 EST)
Preston Walker