



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

IN REPLY PLEASE
REFER TO OUR FILE

December 19, 2024

Docket No. M-2009-2094773

SHELLY-ANN MAYE
SENIOR MANAGER, REGULATORY PERFORMANCE
DUQUESNE LIGHT COMPANY
411 SEVENTH AVENUE
PITTSBURGH, PA. 15219
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**Re: Biennial Inspection, Maintenance, Repair and Replacement Plan (2026-2027)
for Duquesne Light Company at Docket No. M-2009-2094773**

Dear Ms. Maye:

On September 24, 2024, Duquesne Light Company (Duquesne) filed its Biennial Inspection, Maintenance, Repair and Replacement Plan (Plan), pursuant to 52 Pa. Code § 57.198(a), to be made effective on January 1, 2022.

The Commission's regulations require 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. The Commission's Implementation Order, entered August 13, 2009, identified Duquesne as one of six (6) EDCs in Compliance Group 2 to initially file their Plan by October 1, 2010, and then every two years thereafter. The Plan must cover the two calendar years beginning 15 months after filing and remain in effect for two calendar years thereafter (January 1, 2026, through December 31, 2027).

Duquesne has proposed changes to its original plan, which will be discussed herein.

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.

Duquesne's 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.

Duquesne has proposed modifications, discussed *infra*, for the following programs, or parts of programs:

- Pole loading calculations
- Distribution Overhead Line Inspection Interval
- Distribution Overhead Transformer Inspection Interval
- Distribution Pad Mounted Transformer Inspection Interval

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 sub52 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.*

Duquesne's 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.

Duquesne's 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 Duquesne will visually inspect distribution wood poles on a 12-year cycle.

Duquesne included a previously approved exemption from performing pole load calculations as part of pole inspections. Duquesne indicated that pole failures only contribute on average 0.006 to the overall SAIFI Index during the last 10 years.

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

Duquesne's 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.*

Duquesne included a previously approved exemption from performing distribution overhead line inspections every one to two years. Duquesne instead will continue its existing five-year cycle, which utilizes infrared technology to identify problems before they adversely affect the reliability and safety of the distribution system. Duquesne averred that issues that

would be identified through its inspection process have only contributed 0.109 on average to its SAIFI index the past 10 years.

Therefore, Duquesne is granted exemption from performing distribution overhead line inspections every one to two years. However, Duquesne shall perform a 100% infrared visual inspection and normal visual inspection of overhead lines and components on a five-year cycle.

The Plan is consistent with the previously approved Plan 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.

Duquesne'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.*

Duquesne included previously approved exemptions from performing overhead distribution transformer inspections every one to two years, and above-ground pad-mounted transformers every five years. Duquesne noted the overhead distribution transformers would be inspected as part of its five-year overhead line inspections, which include an infrared inspection. Duquesne further noted that its pad-mounted transformers would be inspected every eight years in conjunction with its below-ground transformer inspections. Duquesne averred that issues associated with all transformers contribute on average less than 0.021 to its overall SAIFI index during the past 10 years.

Therefore, Duquesne is granted exemptions from performing distribution transformer inspections every one to two years, and pad-mounted transformer inspections every five years. However, Duquesne shall perform a 100% infrared visual inspection and normal visual inspection of overhead distribution transformers on a five-year cycle. The Plan is consistent with the previously approved Plan and 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.

Duquesne's 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.

Duquesne's Plan generally complies with Section 57.198(n)(8).

Conclusion

Upon review of Duquesne's Biennial Inspection, Maintenance, Repair and Replacement Plan filed on September 24, 2024, it appears that the filing generally complies to the requirements of 52 Pa. Code § 57.198 and is accepted. Furthermore, as discussed supra, the exemptions requested by Duquesne are 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 two calendar years, beginning January 1, 2026. Duquesne 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 Duquesne quarterly reliability reports 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, Bureau of Technical Utility Services at (717) 773-7380, or jvanvant@pa.gov.

Sincerely,



Rosemary Chiavetta
Secretary

cc: Kriss Brown, LAW
John Van Zant, TUS
Dan Searfoorce, TUS
Brent Killian, BIE