



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

IN REPLY PLEASE
REFER TO OUR FILE

December 20, 2024

Docket No. M-2009-2094773

WHITNEY E. SNYDER
MCKEON & SNISCAK LLP
100 NORTH TENTH STREET
HARRISBURG, PA 17120
wesnyder@hmslegal.com

**Re: Biennial Inspection, Maintenance, Repair and Replacement Plan (2026-2027)
of Pike County Light and Power Company at Docket No. M-2009-2094773**

Dear Whitney E. Snyder:

On October 15, 2024, Pike County Light and Power Company’ (PCL&P) 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, 2026.

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 PCL&P 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).

PCL&P 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.

PCL&P’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.

PCL&P requested a continuation of the waiver, discussed *infra*, for its Pole Inspections programs and a waiver for its distribution overhead line inspections.

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.*

PCL&P'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.

PCL&P reports that they have established a vegetation maintenance treatment cycle of five years for their system.

PCL&P's Plan meets the requirements of 52 Pa Code Chapter 57 §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 PCL&P will visually inspect distribution wood poles on a 12-year cycle.

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. PCL&P avers a requirement to perform load calculations as part of the pole inspection program is not warranted.

Therefore, PCL&P is granted exemption from performing load calculations as part of its pole inspection program. However, PCL&P 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.

PCL&P avers 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.

PCL&P '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.*

Although not included PCL&P’s current Plan, in supplemental information provided, PCL&P is requesting a waiver of the ground patrol requirement of 52 Pa. Code § 57.198(n)(4) for its distribution overhead line inspections. PCL&P has been using drone technology for the past two cycles to perform this work and PCL&P believes it has a higher level of success in identifying anomalies on the overhead system than if PCL&P used strictly a ground patrol. The waiver is required for the drone technology because 52 Pa. Code § 57.198(n)(4) specifically requires inspection by “ground patrol.”

PCL&P states that it will conduct inspections of its overhead distribution facilities by ground and/or drone patrols every two years. This first PCL&P cycle was completed in 2018-2019. The second cycle was completed in 2021-2022. The third cycle was completed in 2024. PCL&P notes that the purpose of the inspection program is to verify that the overhead facilities are in a safe, operational and reliable condition and that 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, infrared hot spots and any other conditions which may adversely affect the distribution system. Inspection information will be documented, and corrective action performed.

PCL&P’s Plan meets the requirements of 52 Pa Code Chapter 57 §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.

PCL&P states that 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. PCL&P states that 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.

PCL&P’s Plan meets the requirements of 52 Pa Code Chapter 57 §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.*

PCL&P avers that it will inspect all its overhead distribution transformers on a two-year cycle as part of the overhead distribution line inspection program. PCL&P notes that it will inspect all its pad-mount transformers on a five-year cycle. There are no below-ground transformers on the PCL&P system. PCL&P notes that the purpose of the inspection is to verify that all transformers are in a safe, operational, and reliable condition.

PCL&P avers that inspection information will be documented and that conditions that require corrective actions will be repaired as required by the severity of the deficiency identified.

PCL&P's Plan meets the requirements of 52 Pa Code Chapter 57 §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.

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

PCL&P's Plan meets the requirements of 52 Pa Code Chapter 57 §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.

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.

PCL&P's Plan meets the requirements of 52 Pa Code Chapter 57 §57.198(n)(8).

Conclusion

Upon review of PCL&P's Biennial Inspection, Maintenance, Repair and Replacement Plan filed on October 15, 2024, it appears the filing generally complies with the requirements of 52 Pa. Code § 57.198 and is accepted. Furthermore, as discussed supra, the exemptions requested by PCL&P 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. PCL&P 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 PCL&P 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,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is written in a cursive, flowing style.

Rosemary Chiavetta
Secretary

cc: Edward Verbraak, PCL&P, everbraak@pclpeg.com
Kris Brown, LAW
John Van Zant, TUS
Dan Searforce, TUS
Brent Killian, BIE