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Docket No. C-2024-3052636

James Day v. FirstEnergy Pennsylvania Electric Company

The Hon. Eranda Vero

Hearing Date: Tuesday, April 8, 2025 at 10:00 AM

Call-In Hearing No.: 866.560.8322; PIN: 36676820#

PROPOSED EXHIBITS OF FE PA (PENELEC RATE DISTRICT)

1. Customer Contacts
2. Docket No. C-2022-3030531, Settlement Letter, dated 3/21/22 & CSAT
3. Docket No. C-2024-3050611 Settlement Letter, dated 9/30/24 & CSAT
4. GIS view of Circuit
5. Outage History
6. Event Orders for Outages
7. Reliability Improvements
8. Docket No. M-2009-2094773, Biennial Inspection & Maintenance for 2023-2024
9. Secretarial Letter for 2023-2024
10. 2022 off-cycle vegetation maintenance
11. 2024 cycle vegetation maintenance count

Customer: JAMES G DAY / [REDACTED]
 Contract Acct: [REDACTED]
 Service Address: 1206 STATION HILL RD, NICHOLSON PA 18446

Created On: 03/11/2025
 Date Range: 03/11/2020 to 03/11/2025

Customer Contact History



Contact Date	Created Date	Contract Acct	Created By	Description
12/20/2029 13:14:33	12/20/2024	[REDACTED]	Charles Howlett	PUC/BPU Complaint-Written
PA Formal C-2024-3052636 received regarding vegetation management and reliability. Satisfied Not Applicable: Reason - Manual work				
11/26/2024 03:30:05	11/26/2024	[REDACTED]	CS General Purpose Batch	DSPTRIGHTS Letter
11/25/2024 11:10:51	11/25/2024	[REDACTED]	Donna McCardle	General Inquiry
CB- VM Left Satisfied Not Applicable: Reason - Send DSPRTS				
11/24/2024 18:02:55	11/24/2024	[REDACTED]	EAILOGINWM6	Outbound Callback About Trouble Inquiry
Call Result - SRC_ANSWER_LIVE Invalid or no response from Customer.				
11/23/2024 11:34:09	11/23/2024	[REDACTED]	EAILOGINWM6	Additional Customer Call
Played_POWERONDESC_CustomerMessage 06 The interruption in service was due to inclement weather. ERT: 11/24/2024 11:00:00 PM				
11/23/2024 11:25:54	11/23/2024	[REDACTED]	EAILOGINWM6	Additional Customer Call
11/22/2024 17:55:54	11/22/2024	[REDACTED]	EAILOGINWM6	Outbound Call - ETR Update
Call Result - SRC_ANSWER_LIVE ETR - 2024-11-24 23:00:00 POWERONDESC:				
11/22/2024 17:29:03	11/22/2024	[REDACTED]	EAILOGINWM6	Additional Customer Call
Played_POWERONDESC_CustomerMessage 09 We are aware of your outage and we are investigating the cause. ERT: 11/22/2024 8:00:00 PM				
11/22/2024 11:11:40	11/22/2024	[REDACTED]	EAILOGINWM6	Lights-None
08/07/2024 16:11:31	08/07/2024	[REDACTED]	Charles Howlett	PUC/BPU Complaint-Written
PA Formal C-2024-3050611 received regarding outages and service reliability. Satisfied Not Applicable: Reason - Manual work				
07/16/2024 13:17:47	07/16/2024	[REDACTED]	Westin Stickel	BP Callback About Trouble Call
Reported By: JAMES G DAY Work Type: NLNL Storm Mode: Storm Mode ERT Type: GLB ERT Time Quoted: 07/18/24 11:00 PM Script Read: Yes Customer was not satisfied. Rights provided to customer. advised etr Created By: Westin Stickel				
07/16/2024 09:12:06	07/16/2024	[REDACTED]	EAILOGINWM6	Additional Customer Call
07/16/2024 07:48:16	07/16/2024	[REDACTED]	EAILOGINWM6	Additional Customer Call
Played Outage Message TUNKHANNOCK CA PA				
07/15/2024 19:16:21	07/15/2024	[REDACTED]	EAILOGINWM6	Lights-None
Played Outage Message TUNKHANNOCK CA PA				
05/30/2024 08:23:07	05/30/2024	[REDACTED]	Virgil Kennedy	Provide Program Information
OUTBOUND EMAIL TO ADVISE OF WARM PROGRAM				
04/13/2024 11:42:33	04/13/2024	[REDACTED]	EAILOGINWM6	Lights-None
Played_POWERONDESC_CustomerMessage 09 We are aware of your outage and we are investigating the cause. ERT: 4/13/2024 2:				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
30:00 PM				
09/08/2023 11:11:22	09/08/2023		Joshua Fenske	BP Callback About Trouble Call
<p>Reported By: JAMES G DAY Work Type: NLNL Storm Mode: Storm Mode ERT Type: GLB ERT Time Quoted: 09/09/23 11:00 PM Script Read: Yes Customer was not satisfied. Rights provided to customer. Cust called to get an update on his restoration. Created By: Joshua Fenske</p>				
09/08/2023 07:52:10	09/08/2023		EAILOGINWM6	Additional Customer Call
09/07/2023 21:19:32	09/07/2023		EAILOGINWM6	Additional Customer Call
09/07/2023 17:09:25	09/07/2023		EAILOGINWM6	Lights-None
ERT: 09/07/23 08:00 PM				
07/02/2023 04:28:09	07/02/2023		Barbara Carter	Lights-None
<p>Reported By: JAMES G DAY Reported By Phone: (570)241-3363 Storm Mode: Non-Storm Mode ERT Type: SYS ERT Time Quoted: 07/02/23 06:30 AM Script Read: Yes Notification Instructions: Customer was satisfied. Created By: Barbara Carter</p>				
07/02/2023 04:27:26	07/02/2023		Barbara Carter	Premise Information Changed
<p>Old Premise Phone:(570)942-4282 New Premise Phone:(570)241-3363 UPDATED PHONE # UPON REQ Created By: Barbara Carter</p>				
07/02/2023 04:27:26	07/02/2023		Barbara Carter	Personal Data Changed
<p>Old BP Phone:(570)942-4282 New BP Phone:(570)241-3363 UPDATED PHONE # UPON REQ Created By: Barbara Carter</p>				
03/31/2023 19:43:52	03/31/2023		EAILOGINWM6	Outbound Callback About Trouble Inquiry
<p>Call Result - SRC_ANS_MACHINE Invalid or no response from Customer.</p>				
03/31/2023 17:38:03	03/31/2023		B2BEALOGIN	Contact Added to Alert Preferences
<p>Alert Contact Added: (570)241-3363</p>				
03/31/2023 17:38:02	03/31/2023		Sara Crim	Alert Preferences Updated (TEA)
<p>Caller: JAMES G DAY (Business Partner) Customer was satisfied. Alert Enrollments Added: - Reported & Planned Outages added for contact 15702413363</p>				
03/31/2023 17:37:55	03/31/2023		Sara Crim	Alert Contact Preferences Updated (TEA)
<p>Caller: JAMES G DAY (Business Partner)</p>				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
Customer was satisfied.				
Alert Contact Added: 15702413363				
03/31/2023 17:36:10	03/31/2023		Sara Crim	Lights-None
<p>Reported By: JAMES G DAY</p> <p>Reported By Phone: (570)241-3363</p> <p>Storm Mode: Non-Storm Mode</p> <p>ERT Type: SYS</p> <p>Restoration callback requested: (570)241-3363</p> <p>ERT Time Quoted: 03/31/23 08:30 PM</p> <p>Script Read: Yes</p> <p>Notification Instructions:</p> <p>Customer was satisfied.</p> <p>Created By: Sara A Crim</p>				
11/02/2022 14:04:26	11/02/2022		EAILOGINWM6	Outbound Callback About Trouble Inquiry
<p>Call Result - SRC_ANS_MACHINE</p> <p>Invalid or no response from Customer.</p>				
11/02/2022 13:41:18	11/02/2022		EAILOGINWM6	Lights-None
<p>Played POWERONDESC: The interruption in service is due to an emergency equipment repair ERT: 11/02/22 04:00 PM</p>				
10/19/2022 12:36:47	10/19/2022		Brittany Frankenberry	Provide Program Information
<p>OUTBOUND EMAIL CAMPAIGN TO ADVISE OF PCAP AND ERAP</p>				
08/03/2022 10:14:09	08/03/2022		EAILOGINWM6	Outbound Call - Planned Outage
<p>Call Result - SRC_ANS_MACHINE</p> <p>CANCELLATION MESSAGE Hello, this is a message from Penelec y our electric company. The planned outage to your electric se rvic e that was scheduled for Wednesday, July 27th with an al ternate date of Wednesday, August 3rd has been postponed due to an unforeseen emergency. This outage will be reschedulec at a future date and you will be notified of the new date a nd time once determined. To hear this message again, please remain on the line and thank you for your patience as Penel ec works to serve you better. OUT-00066394-PN-PA</p>				
08/01/2022 11:19:37	08/01/2022		EAILOGINWM6	Outbound Call - Planned Outage
<p>Call Result - SRC_ANS_MACHINE</p> <p>GOING WITH ALTERNATE DATE Hello. This message is from Penelec, your electric company. Please be advised that the planned power outage that was scheduled for your area for Wednesday , July 27th, will not occur today and has been rescheduled f or the alternate date of Wednesday, August 3rd. The outage w ill affect customers in the vicinity of Station Hill Road in the town of Nicholson. If you are receiving this message, y ou will experience a service interruption lasting about thre e and a half hours, from approximately 8:30 AM until 12 PM o n Wednesday, August 3rd. Penelec thanks you for your patienc e and understanding while we perform this work. To hear this message again, please remain on the line. OUT-00066256</p>				
07/27/2022 07:57:39	07/27/2022		EAILOGINWM6	Outbound Call - Planned Outage
<p>Call Result - SRC_ANS_MACHINE</p>				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
<p>GOING WITH ALTERNATE DATE Hello. This message is from Penelec, your electric company. Please be advised that the planned power outage that was scheduled for your area for Wednesday, July 27th, will not occur today and has been rescheduled for the alternate date of Wednesday, August 3rd. The outage will affect customers in the vicinity of Station Hill Road in the town of Nicholson. If you are receiving this message, you will experience a service interruption lasting about three and a half hours, from approximately 8:30 AM until 12 PM on Wednesday, August 3rd. Penelec thanks you for your patience and understanding while we perform this work. To hear this message again, please remain on the line. OUT-00066256</p>				
07/25/2022 09:23:13	07/25/2022	[REDACTED]	EAILOGINWM6	Outbound Call - Planned Outage
<p>Call Result - SRC_ANS_MACHINE Hello. This message is from Penelec, your electric company. On Wednesday, July 27th, there will be a planned power outage to replace equipment on a pole. The outage will affect customers in the vicinity of Station Hill Road in the town of Nicholson. If you are receiving this message, you will experience a service interruption, from approximately 8:30 AM until 12 PM for three and a half hours. In the event of an unforeseen emergency or inclement weather, the planned outage would then occur on Wednesday, August 3rd, during the same timeframe. Penelec thanks you for your patience and understanding while we perform this work. To hear this message again, please remain on the line. OUT-00066136</p>				
07/21/2022 12:26:32	07/21/2022	[REDACTED]	EAILOGINWM6	Outbound Call - Planned Outage
<p>Call Result - SRC_ANS_MACHINE Hello. This message is from Penelec, your electric company. On Wednesday, July 27th, there will be a planned power outage to replace equipment on a pole. The outage will affect customers in the vicinity of Station Hill Road in the town of Nicholson. If you are receiving this message, you will experience a service interruption, from approximately 8:30 AM until 12 PM for three and a half hours. In the event of an unforeseen emergency or inclement weather, the planned outage would then occur on Wednesday, August 3rd, during the same timeframe. Penelec thanks you for your patience and understanding while we perform this work. To hear this message again, please remain on the line. OUT-00066136</p>				
06/06/2022 03:30:05	06/06/2022	[REDACTED]	CS General Purpose Batch	DSPTRIGHTS Letter
06/03/2022 17:27:12	06/03/2022	[REDACTED]	Shari Mominee	General Inquiry
<p>sw JAMES G DAY [REDACTED] 000351263401, 000351273818, a temp fix was done and we haven't been back to do a perm fix. bp is calling the item cross beam insulators. contact customer call back notification is 000351436171 pa sat Satisfied Not Applicable: Reason - Send DSPRTS</p>				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
06/03/2022 17:27:05	06/03/2022		Shari Mominee	On - Miscellaneous
<p>Reported By: JAMES G DAY Reported By Phone: (570)942-4282 Storm Mode: Non-Storm Mode ERT Type: SYS ERT Time Quoted: N/A Script Read: Yes Notification Instructions: 000351263401, 000351273818 , a temp fix was done and we havent been back to do a perm fix. bp is calling the item cross beam insulators. contact customer call back notificaiton is 000351436171 Satisfied Not Applicable: Reason - Manual work Created By: Shari L Mominee</p>				
05/18/2022 16:26:40	05/18/2022		Tiffany Wagner	General Inquiry
Customer was satisfied.				
05/18/2022 16:24:31	05/18/2022		Tiffany Wagner	Contact Customer - OM&R
04/27/2022 05:31:06	04/27/2022		EAILOGINWM6	Outbound Call - Wake Up
<p>Call Result - SRC_ANS_MACHINE Wake up time requested - 05:45:00</p>				
04/26/2022 14:52:06	04/26/2022		EAILOGINWM6	Outbound Callback About Trouble Inquiry
<p>Call Result - SRC_ANS_LIVE Customer reports Power is on.</p>				
04/26/2022 14:18:09	04/26/2022		EAILOGINWM6	Lights-None
<p>Wake-up Call Requested for 04/27/2022 05:45:00 to be placed to phone 5709424282 ERT: 04/26/22 05:00 PM</p>				
04/24/2022 15:10:41	04/24/2022		Cindy McCoy	On - Wire - Tree/Limb On Wire
<p>Reported By: JAMES G DAY Reported By Phone: (570)942-4282 Storm Mode: Non-Storm Mode ERT Type: SYS ERT Time Quoted: N/A Script Read: Yes Notification Instructions: REPORTED A TREE IS LAYING ON THE LINE, LINE IS SAGGING , ON SIDE OF HOUSE POLE TO POLE , Customer was satisfied. Created By: Cindy J McCoy</p>				
04/21/2022 15:37:03	04/21/2022		EAILOGINWM6	Outbound Callback About Trouble Inquiry
<p>Call Result - SRC_ANS_MACHINE Invalid or no response from Customer.</p>				
04/20/2022 13:36:06	04/20/2022		EAILOGINWM6	Additional Customer Call
<p>Played POWERONDESC: 09 We are aware of your outage and we ar e investigating the cause ERT: 04/22/22 02:30 PM</p>				
04/19/2022 19:14:57	04/19/2022		Angela Woods	BP Callback About Trouble Call
<p>Reported By: JAMES G DAY Work Type: NLNL Storm Mode: Storm Mode ERT Type: OFF</p>				

Customer Contact History

Contact Date	Created Date	Contract Acct	Created By	Description
ERT Time Quoted: N/A Script Read: Yes Customer was satisfied. Created By: Angela M Woods				
04/19/2022 19:07:27	04/19/2022		EAILOGINWM6	Additional Customer Call
Played outage message:DISTRICTTUNKHANNOCK				
04/19/2022 14:21:02	04/19/2022		Dessica Nestor	Update Comments to Power On
Reported By: JAMES G DAY Work Type: NLNL Storm Mode: Storm Mode ERT Type: OFF ERT Time Quoted: N/A Script Read: Yes Notification Instructions: CUSTOMER CALLED TO VERIFY THAT HE DOES HAVE A TREE ON A POWER LINE. BIG TREE. Customer was satisfied. Created By: Dessica Nestor				
04/19/2022 13:42:35	04/19/2022		EAILOGINWM6	Additional Customer Call
Played outage message:DISTRICTTUNKHANNOCK				
04/19/2022 13:40:45	04/19/2022		EAILOGINWM6	Additional Customer Call
Played outage message:DISTRICTTUNKHANNOCK				
04/19/2022 13:38:43	04/19/2022		EAILOGINWM6	Additional Customer Call
Played outage message:DISTRICTTUNKHANNOCK				
04/19/2022 13:35:19	04/19/2022		EAILOGINWM6	Additional Customer Call
Played outage message:DISTRICTTUNKHANNOCK				
04/19/2022 13:33:31	04/19/2022		EAILOGINWM6	Additional Customer Call
Played outage message:DISTRICTTUNKHANNOCK				
04/19/2022 09:18:37	04/19/2022		EAILOGINWM6	Additional Customer Call
Played outage message:DISTRICTTUNKHANNOCK				
04/19/2022 07:35:26	04/19/2022		EAILOGINWM6	Outbound Call - Wake Up
Call Result - SRC_BUSY Wake up time requested - 07:50:00				
04/19/2022 07:34:32	04/19/2022		EAILOGINWM6	Outbound Call - ETR Update
Call Result - SRC_ANS_LIVE ETR - 2022-04-19 09:30:02.0 POWERONDESC:				
04/19/2022 07:06:16	04/19/2022		EAILOGINWM6	Additional Customer Call
Played outage message:DISTRICTTUNKHANNOCK				
04/19/2022 02:27:44	04/19/2022		EAILOGINWM6	Lights-None
Wake-up Call Requested for 04/19/2022 07:50:00 to be placed to phone 5709424282 ERT: 04/19/22 05:30 AM				
01/25/2022 08:48:25	01/25/2022		Charles Howlett	PUC/BPU Complaint-Written
PA Formal complaint C-2022-3030531 received regarding service reliability. C Howlett/Compliance Satisfied Not Applicable: Reason - Manual work				

Marg
Partr
mmo

Cira
2929
Phila



Main: 215.495.6500
Direct: 215.495.6524
Fax: 215.495.6600

March 21, 2022

Via Electronic and First-Class Mail

James Grant Day
1206 Station Hill Road
Nicholson, PA 18446
DayJim1206@yahoo.com

**Re: Docket No. C-2022-3030531
James Grant Day v. Pennsylvania Electric Company
Certified Statement**

Dear Mr. Grant:

This will confirm our discussion on Thursday, March 17, 2022, regarding your Formal Complaint filed with the Pennsylvania Public Utility Commission (PUC) against Pennsylvania Electric Company (Penelec) for service to 1206 Station Hill Road, Nicholson, Pennsylvania (Service Location) under Account No. [REDACTED], in the above-referenced proceeding.

During our discussion, you advised that the recent tree work done at the Service Location resolved your issue raised in the Formal Complaint and that you no longer wished to pursue the matter. As agreed, I discussed your concerns with Penelec. **I again emphasize that Penelec does not expect, nor encourages a customer, to investigate if a line is down during an outage.**

I have enclosed a copy of the Certified Statement that you authorized me to file which terminates the matter before the PUC. **No further action is required on your part. If you do not agree to this, you have ten (10) days to object in writing as indicated on the enclosed Certified Statement.**

Very truly yours,

Reger Rizzo & Darnall LLP

A handwritten signature in blue ink that reads "Margaret A. Morris".

Margaret A. Morris, Esquire

MAM/mam
Enclosures

cc: Tori Giesler, Esquire, FirstEnergy Service Company [w/encl.]

March 21, 2022

Via Electronic Filing

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No. C-2022-3030531
James Grant Day v. Pennsylvania Electric Company
Certified Statement**

Dear Secretary Chiavetta:

Attached please find a Certified Statement to be filed in the above-referenced proceeding. A copy of the document has been served upon the Complainant as indicated on the attached Certificate of Service.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/co
Enclosure

cc: Mediator Teri-Lee Rhoades [w/encl.]
Tori Giesler, Esquire, FirstEnergy Service Company [w/encl.]
James Grant Day [w/encl.]



Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
 Harrisburg, PA 17105-3265
EFILING - FILING DETAIL

Date Created	Filing Number
3/21/2022	2374775

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Docket Number: C-2022-3030531
Case Description: James Grant Day v. Pennsylvania Electric Company
Transmission Date: 3/21/2022 3:05 PM
Filed On: 3/21/2022 3:05 PM
eFiling Confirmation Number: 2374775

File Name	Document Type	Upload Date
Day Certified Statement.pdf	Certificate of Satisfaction	3/21/2022 3:04:01 PM

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

No paper submission is necessary for filings under 250 pages.

You can view a record of this filing and previous filings you have submitted to the PUC by using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

**Re: Docket No. C-2022-3030531
James Grant Day v. Pennsylvania Electric Company
Certified Statement**

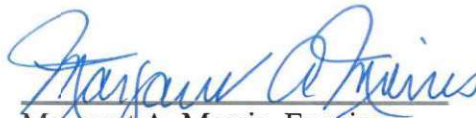
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s), in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Via Electronic and First-Class Mail

James Grant Day
1206 Station Hill Road
Nicholson, PA 18446
DayJim1206@yahoo.com

Dated: March 21, 2022


Margaret A. Morris, Esquire

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JAMES GRANT DAY

v.

PENNSYLVANIA ELECTRIC COMPANY

:
:
:
:
:

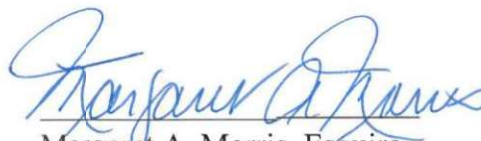
Docket No. C-2022-3030531

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

NOW COMES Pennsylvania Electric Company, by and through its attorneys, Reger Rizzo & Darnall LLP, pursuant to 52 Pa. Code § 5.24, and certifies the following:

1. James Grant Day (Complainant) no longer wishes, at this time, to pursue the above captioned Formal Complaint.
2. Notice is given to the Complainant that he has the right to object to this Certified Statement, in writing to the Commission's Secretary, within ten (10) days from this notification. Absent a timely objection, the Complaint docket should be marked closed.
3. As indicated on the attached Certificate of Service, a copy of this document has been served on the Complainant.

Respectfully submitted,



Margaret A. Morris, Esquire

Attorney ID No. 75048

Cira Centre, 13th Floor

2929 Arch Street

Philadelphia, PA 19104

(215) 495-6524 tel.

mmorris@regerlaw.com

Dated: March 21, 2022

Counsel for Pennsylvania Electric Company

September 30, 2024

VIA U.S. MAIL

James G. Day
1206 Station Hill Road
Nicholson, PA 18446

Re: James G. Day v. FirstEnergy Pennsylvania Electric Company
Docket No. C-2024-3050611

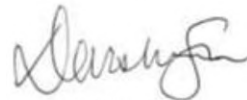
Dear Mr. Day:

Per your voice mail to Cindy Lehman on September 24, 2024, you indicated satisfaction in resolving the above-referenced formal complaint. FirstEnergy Pennsylvania Electric Company on behalf of its Met-Ed Rate District ("Met-Ed") cleared all problem trees on your property.

Based upon this information, I have enclosed a copy of the Certificate of Satisfaction that Met-Ed has filed with the Pennsylvania Public Utility Commission. This will terminate the matter, and no further action is required on your part. **If you do not agree to this, you have ten days to object in writing.**

If you have any questions or concerns, please do not hesitate to give me a call.

Very truly yours,



Darsh Singh

DS/dml

Enclosures

September 30, 2024

VIA U.S. MAILJames G. Day
1206 Station Hill Road
Nicholson, PA 18446**Re: James G. Day v. FirstEnergy Pennsylvania Electric Company**
Docket No. C-2024-3050611


Dear Mr. Day:

Per your voice mail to Cindy Lehman on September 24, 2024, you indicated satisfaction in resolving the above-referenced formal complaint. FirstEnergy Pennsylvania Electric Company on behalf of its Met-Ed Rate District ("Met-Ed") cleared all problem trees on your property.

Based upon this information, I have enclosed a copy of the Certificate of Satisfaction that Met-Ed has filed with the Pennsylvania Public Utility Commission. This will terminate the matter, and no further action is required on your part. **If you do not agree to this, you have ten days to object in writing.**

If you have any questions or concerns, please do not hesitate to give me a call.

Very truly yours,



Darsh Singh

DS/dml

Enclosures

September 30, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

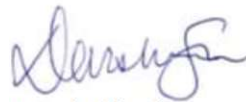
Re: James G. Day v. FirstEnergy Pennsylvania Electric Company
Docket No. C-2024-3050611

Dear Secretary Chiavetta:

Enclosed please find a Certificate of Satisfaction to be filed in the above-referenced matter. A copy of the document has also been served upon the Complainant, as indicated by the Certificate of Service.

If you have any questions, please contact me.

Very truly yours,



Darsh Singh

DS/dml

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JAMES G. DAY

v.

**FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY**

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:
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Docket No. C-2024-3050611

CERTIFICATE OF SATISFACTION

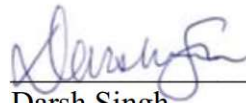
TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

NOW COMES, FirstEnergy Pennsylvania Electric Company on behalf of its Met-Ed Rate District (“Met-Ed”), by and through its attorney, Darsh Singh, in accordance with 52 Pa. Code § 5.24, and certifies the following:

1. Met-Ed has satisfied the formal complaint of James G. Day (“Complainant”).
2. On or about September 24, 2024, the Complainant acknowledged satisfaction of the above-captioned formal complaint.
3. The Complainant has been informed that he has ten days to object in writing.
4. A copy of this Certificate has been served upon the Complainant in accordance with the attached Certificate of Service.

Respectfully submitted,

Dated: September 30, 2024



Darsh Singh
Attorney No. 330971
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
(610) 212-8331
singhd@firstenergycorp.com

Counsel for FirstEnergy Pennsylvania Electric
Company, Met-Ed Rate District

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JAMES G. DAY

v.

**FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY**

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Docket No. C-2024-3050611

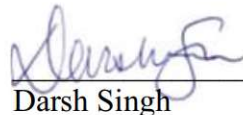
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Certificate of Satisfaction of FirstEnergy Pennsylvania Electric Company on behalf of its Met-Ed Rate District to the Complaint of James G. Day upon the individual listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by first class mail, as follows:

James G. Day
1206 Station Hill Road
Nicholson, PA 18446

Dated: September 30, 2024



Darsh Singh
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
(610) 212-8331
singhd@firstenergycorp.com

Counsel for FirstEnergy Pennsylvania Electric
Company, Met-Ed Rate District





James G. Day

Complainant Sustained outage history

Account # [REDACTED]

1206 Station Hill Rd Nicholson, PA 18446

James G. Day

Sustained Outage History (3/21/2022 to 3/24/2025) **

Start Date	Duration (minutes)	Weather	Cause	Event
4/19/22	3681	Snow-Ice with high winds	Ice	11988117-1
4/26/22	11	Fair Sunny	Equipment Failure	11997782-1
7/02/23	365	Fair Sunny	Unknown	498861
9/07/23	1131	Rain with Lightning	Trees Off ROW	644823
4/13/24	142	Rain with High Winds	Line Failure	1024557
6/22/24	40	Fair Sunny	Equipment Failure	1136157
6/22/24	19	Fair Sunny	Equipment Failure	1136157
7/15/24	1281	Rain with Lightning	Lightning	1215033
11/22/24	3287	Snow-ice with high winds	Ice	1456206

** as requested, forced outages were not listed in this report



Event Details for 11988117-1

Time Off 04/19/2022 02:12	Event Created 04/19/2022 02:17	Assigned 	Dispatch
En Route 	Arrived 	Last Restoration 04/21/2022 15:33	Field Complete 04/21/2022 15:36
Closed 04/21/2022 15:36	ETR 04/22/2022 14:14	Calls 65	Custs Affected 133
Crew 	Crew Area TUNKHANNOCK CA		
Work Desc No Lights	Duration (Min) 3681	Total CMI 489573	

Organization

Current Org Dispatch	Substation NICHOLSON	Disp Center Montrose District
Owner Reed, Heath	Circuit 00288-65	Disp Area Towanda Oper Area

Device Info

ID Circuit NICHOLSON-00288-65 (607150662)	
Type Circuit Lockout	Voltage 4.8 KV DELTA

Event Details

Cause Ice	Cause Pole unk
Failed Comp 	Facility Location NICHOLSON
Action Taken 	Outage Type Subtransmission
Related Events 	Weather Snow-ice with high winds
Follow Up 	Follow Ups Sent
Comments ref pn-22-10690-cc, PN-22-10662-CC %2526 po #11988109/11988287. Lenox circuit 438-65 is carrying Oxbow circuit 00458-65. 438-65 cb t/lo at 0846. 2 SPANS OF WIRE BURIED IN TREES LK-18765 TO LK-18865 NEED LARGE MANUAL TREE CREW. LK-18765 BROKEN X-ARM. tree on primary between LK109 %2526 LK110, need 10ft Crossarm and 3-35kV vert post insu for both climber poles. Also static down LK-108 to LK-110. Opened 253756b53884 and all cb's at Nicholson Sub. Closed n.o 253751b53886 then the 289-65 cb at Nicholson at 1300 on 4/21. Restored the 287-65 circuit at 1532. Restored 288-65 circuit at 1533. ref po #'s11990443, 11993468, 11993476 and 11993479 for 30 customers	

Event ID: 11997782-1 Type: Outage Event Status: Archived Priority: 5 Special:



Event Details for 11997782-1

Time Off 04/26/2022 14:13	Event Created 04/26/2022 14:19	Assigned	Dispatch
En Route	Arrived	Last Restoration 04/26/2022 14:29	Field Complete 04/26/2022 18:08
Closed 04/26/2022 18:09	ETR 04/26/2022 16:44	Calls 29	Custs Affected 326
Crew	Crew Area TUNKHANNOCK CA	Duration (Min) 16	Total CMI 2119
Work Desc No Lights			

Organization

Current Org Dispatch	Substation NICHOLSON	Disp Center Montrose District
Owner Reed, Heath	Circuit 00288-65	Disp Area Towanda Oper Area

Device Info

ID Circuit NICHOLSON-00288-65 (607150662)	
Type Circuit Lockout	Voltage 4.8 KV DELTA

Event Details

Cause Equipment Failure	Cause Pole Pole LK-15665
Failed Comp	Facility Location NICHOLSON
Action Taken	Outage Type Subtransmission
Related Events	Weather Fair-Sunny-Overcast
Follow Up	Follow Ups Sent
Comments PN-22-11148-CC and po #11997778, 34kv bus diff at Oxbow and the 438-65 cb at Lenox t/lo at 1413. Opened 253756B53884 and closed the cb at 1422. opened 253751b53886 and closed 253756B53884 at 1424(Nicholson). Closed 253751b53886 and the cb t/lo at 1427. Opened 253751b53886 and closed the cb at 1429. Found failed insulator LK-156. Lenox to oxbow line was tied through at the time.	

Event ID: 498861 | Type: Outage | Event Status: Archived | Priority: 5 | Special:



Event Details for 498861

Time Off 07/02/2023 03:10	Event Created 07/02/2023 03:10	Assigned 07/02/2023 06:30	Dispatch 07/02/2023 06:31
En Route 07/02/2023 07:56	Arrived 07/02/2023 09:24	Last Restoration 07/02/2023 09:15	Field Complete 07/02/2023 12:38
Closed 07/02/2023 12:38	ETR 07/02/2023 14:10	Calls 10	Custs Affected 6
Crew Eddy_Jeffrey J - 47309	Crew Area TUNKHANNOCK CA		
Work Desc Device Operation (44187)	Duration (Min) 365	Total CMI 2190	

Organization

Current Org ADMS Support	Substation NICHOLSON	Disp Center Montrose District
Owner Merrill, Patrick C	Circuit 00288-65	Disp Area Towanda Oper Area

Device Info

ID
Fuse AB 8L465 00288-65

Type
Fuse

Voltage

Event Details

Cause Unknown	Cause Pole Unknown
Failed Comp Unknown	Facility Location 1691 STATION HILL RD NICHOLSON, PA 18446
Action Taken Restored	Outage Type Distribution
Related Events	Weather Fair-Sunny-Overcast
Follow Up	Follow Ups Sent
Comments ran call out. nobody accepted. Blown line fuse 8L4 cause unknown. Restored at 09:15.	

Event ID: 644823 Type: Outage Event Status: Archived Priority: 4 Special:



Event Details for 644823

Time Off 09/07/2023 16:58	Event Created 09/07/2023 16:58	Assigned 09/08/2023 08:20	Dispatch 09/08/2023 08:20
En Route 09/08/2023 09:23	Arrived 09/08/2023 09:23	Last Restoration 09/08/2023 11:49	Field Complete 09/08/2023 12:21
Closed 09/08/2023 12:21	ETR 09/09/2023 23:00	Calls 25	Custs Affected 35
Crew Bennett_Adam M - 55663	Crew Area TUNKHANNOCK CA		
Work Desc No Lights - Wire Down Pole to Pole	Duration (Min) 1131	Total CMI 39585	

Organization

Current Org Dispatch	Substation NICHOLSON	Disp Center Montrose District
Owner Merritt, Bailey	Circuit 00288-65	Disp Area Towanda Oper Area

Device Info

ID Fuse AB 6L32465 00288-65	
Type Fuse	Voltage Unknown/4.8 kV

Event Details

Cause Trees Off ROW-Tree	Cause Pole 6L1065	
Failed Comp Crossarm	Facility Location 445 GLENWOOD SWITCH RD NICHOLSON, PA 18446	
Action Taken Replaced	Outage Type Distribution	Weather Rain with lightning
Related Events 650002	Follow Ups Sent	
Follow Up		
Comments TREE AT POLE 6I10 BLEW FUSE AT 6I324. TREE CREW CLEARED TREE LINE REPLACED ARM RESTORED AT 11:49		

Event ID: 1024557 Type: Outage Event Status: Archived Priority: 5 Special:



Event Details for 1024557

Time Off 04/13/2024 11:31	Event Created 04/13/2024 11:33	Assigned	Dispatch
En Route	Arrived	Last Restoration 04/13/2024 13:53	Field Complete 04/13/2024 15:37
Closed 04/13/2024 15:37	ETR 04/13/2024 16:03	Calls 44	Custs Affected 160
Crew	Crew Area TUNKHANNOCK CA	Duration (Min) 142	Total CMI 22720
Work Desc No Lights			

Organization

Current Org Dispatch	Substation NICHOLSON	Disp Center Montrose District
Owner Hinkson, Jake	Circuit 00288-65	Disp Area Towanda Oper Area

Device Info

ID Breaker-00288-65	Voltage Unknown/4.8 kV
Type Circuit Lockout	

Event Details

Cause Line Failure	Cause Pole POLE-LK-22365
Failed Comp Conductor. - Bare	Facility Location 1481 STATION HILL RD NICHOLSON, PA 18446
Action Taken Isolated	Outage Type Subtransmission
Related Events 1025019	Weather Rain with high winds
Follow Up	Follow Ups Sent
Comments ref # 1024551. ref PN-24-10698-CC, 438-65 CB at Lenox T/LO at 1131. 5 poles down from lk-227 to lk-231 due to a tree. opened 253756b53884. opened the 4kv cbs @ Nicholson Sub. closed N.O. 253751B53886 at 1347. closed 287-65 cb @ 1352. closed 288-65 cb @ 1353. closed 289-65 cb @ 1405.	

Event Details for 1136157

Time Off	Event Created	Assigned	Dispatch
06/22/2024 15:11	06/22/2024 15:11	06/22/2024 15:13	06/22/2024 16:18
En Route	Arrived	Last Restoration	Field Complete
06/22/2024 18:00	06/22/2024 18:32	06/23/2024 19:33	06/23/2024 19:40
Closed	ETR	Calls	Custs Affected
06/23/2024 19:40	06/23/2024 21:00	4	27
Crew	Crew Area		
Beamer_Jack W - 41687	TUNKHANNOCK CA		
Work Desc	Duration (Min)	Total CMI	
No Lights	1702	2469	

Organization

Current Org	Substation	Disp Center
Dispatch	NICHOLSON	Montrose District
Owner	Circuit	Disp Area
Moyer, Caleb	00288-65	Towanda Oper Area

Device Info

ID	Step Transformer 8L96365 AB 00288-65	
Type	Voltage	
Primary Transformer	Unknown/4.8 kV	

Event Details

Cause	Cause Pole
Equipment Failure	UG Transformer 1711765 A 00288-65
Failed Comp	Facility Location
Transformer Padmount	1119 STATION HILL RD NICHOLSON, PA 18446
Action Taken	Outage Type
Replaced	Distribution
Related Events	Weather
1137667	Fair-Sunny-Overcast
Follow Up	Follow Ups Sent
Auto generate of SAP follow up due to capital item	Line SAP Followup Sent
Comments	
(A)ph Fuse 8L963 is blown. unknown cause. closed and blew fuse 8L4 at 1853. failed insulator at 8L963. replaced insulator and closed 8L4 at 1933. closed 8L963 and blew fuse 8L4 at 1939. closed 8L4 at 1958. bad padmount tx 17117. back yard machine needed. RAD to J. Beamer @ 0758 from 8L963. Released @ 0848. closed @ 0901 and no voltage @ house. Changing 4.8kv tx of the susquhanna step bank @ 8L963. Working as hot Bad primary URD. Will need a temp string out PN-24-17020-CC for temp string out order Restored 8L963 @ 1933 on 3/23. UG primary checked good refer to PN-24-17023-CC & pn-24-17020-cc, replacing pad at 17117 again got pad pad from supply	

Event ID: 1215033 Type: Outage Event Status: Archived Priority: 5 Special:



Event Details for 1215033

Time Off 07/15/2024 19:13	Event Created 07/15/2024 19:13	Assigned 07/16/2024 07:22	Dispatch 07/16/2024 08:16
En Route 07/16/2024 11:47	Arrived 07/16/2024 11:50	Last Restoration 07/16/2024 16:34	Field Complete 07/16/2024 17:40
Closed 07/16/2024 17:53	ETR 07/16/2024 18:01	Calls 24	Custs Affected 34
Crew Ferguson_Nicholas T - 56764	Crew Area TUNKHANNOCK CA		
Work Desc No Lights	Duration (Min) 1281	Total CMI 43554	

Organization

Current Org Dispatch	Substation NICHOLSON	Disp Center Montrose District
Owner Pierce, Ted E	Circuit 00288-65	Disp Area Towanda Oper Area

Device Info

ID
Fuse AB 6L32465U 00288-65

Type
Fuse

Voltage
Unknown/4.8 kV

Event Details

Cause Lightning	Cause Pole Unknown
Failed Comp Unknown	Facility Location 1481 STATION HILL RD NICHOLSON, PA 18446
Action Taken Restored	Outage Type Distribution
Related Events	Weather Rain with lightning
Follow Up	Follow Ups Sent SAP Followup Not Sent
Comments blown "A" fuse 6L324 feeding 6L3 . Patrolled found no issues. restored at 1634 .	

Event Details for 1456206

Time Off 11/22/2024 11:10	Event Created 11/22/2024 11:10	Assigned 11/24/2024 14:59	Dispatch 11/24/2024 14:59
En Route 11/24/2024 15:02	Arrived 11/24/2024 15:31	Last Restoration 11/24/2024 17:57	Field Complete 11/24/2024 17:57
Closed 11/24/2024 17:57	ETR 11/24/2024 23:00	Calls 23	Custs Affected 35
Crew Daugherty_Michael L - 3689	Crew Area TUNKHANNOCK CA		
Work Desc No Lights - Wire Down	Duration (Min) 3287	Total CMI 115045	

Organization

Current Org Dispatch	Substation NICHOLSON	Disp Center Montrose District
Owner Moyer, Caleb	Circuit 00288-65	Disp Area Towanda Oper Area

Device Info

ID Fuse AB 6L32465U 00288-65	
Type Fuse	Voltage Unknown/4.8 kV

Event Details

Cause Ice	Cause Pole POLE-8L12465
Failed Comp Insulator	Facility Location 1691 STATION HILL RD NICHOLSON, PA 18446
Action Taken Replaced	Outage Type Distribution
Related Events	Weather Snow-ice with high winds
Follow Up Auto generate of SAP follow up due to capital item	Follow Ups Sent SAP Followup Not Sent
Comments blown fuse 6L324(all out). opened other fuse @ 1546. Patrolling line to find issues. Found twisted arm and wire off insulator. Crew will work hot Restored @ 1730.	



James G. Day
Circuit Inspection, Maintenance Patrols, and Reliability Enhancements
Account # [REDACTED]
1206 Station Hill Rd Nicholson, PA 18446

Circuit Inspections and Maintenance Patrols:

Overhead Circuit Inspection – 2017
Mainline Infrared and Overhead Inspection – 2018
HLC* Overhead Inspection – 2023
Recloser inspections – Completed Annually
Capacitor inspections – Completed Annually
Substation inspections – Completed Monthly

Reliability Enhancements:

Repair items identified during circuit inspection – 2017
Repair items identified during circuit inspection – 2018
Cycle Tree Trimming – 2019
LTIP Pole Replacement – June 2022
Cycle Tree Trimming – 2024

*HLC – Hot Line Clamp

Tori L. Giesler, Esq.
(610) 921-6658
(330) 315-9263 (Fax)

October 1, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**Re: Biennial Inspection, Maintenance, Repair and Replacement Plan –
Pennsylvania Electric Company for the period January 1, 2023 –
December 31, 2024
Docket No. M-2009-2094773**

Dear Secretary Chiavetta:

In accordance with 52 Pa. Code § 57.198, enclosed for filing on behalf of Pennsylvania Electric Company (“Penelec”) is an original and one copy of the Biennial Inspection, Maintenance, Repair and Replacement Plan (the “Plan”) for the period January 1, 2023 through December 31, 2024.

This Plan is designed consistent with the guidelines established by the National Electric Safety Code, the Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission regulations, and the American National Standards Institute, Inc. The Plan also has been designed to reduce the risk of outages on Penelec’s system and form the basis of its inspection and maintenance goals and objectives as outlined in Penelec’s annual and quarterly reliability reports filed with the Pennsylvania Public Utility Commission (“Commission”).

Penelec respectfully requests that the Commission accept its Biennial Inspection, Maintenance, Repair and Replacement Plan. If you have any questions, please contact me or Laurel Klingensmith at (330) 374-6672.

Very truly yours,



Tori L. Giesler

kbw
Enclosure

c: D. Searforce

**Biennial Inspection, Maintenance, Repair and
Replacement Plan for Pennsylvania Electric Company**

For the period of January 1, 2023 – December 31, 2024

**Submitted by:
Scott R. Wyman
President, Pennsylvania Operations
800 Cabin Hill Drive
Greensburg, PA 15601
Email: wymans@firstenergycorp.com**

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Introduction

Pursuant to 52 Pa. Code § 57.198(a), every two years an electric distribution company shall file with the Pennsylvania Public Utility Commission (“Commission”) a biennial plan for the periodic inspection, maintenance, repair and replacement of its facilities. Pennsylvania Electric Company (“Penelec” or “Company”) hereby submits its Biennial Inspection, Maintenance, Repair and Replacement Plan (“I&M Plan”) for the period January 1, 2023, through December 31, 2024 in accordance with the relevant parts of 52 Pa. Code § 57.198.

System Assessment

Penelec serves more than 580,000 Pennsylvania customers and the service territory covers nearly 10,000 square miles. From the physical field employees up to and including top management, Penelec is committed to providing customers with safe and reliable electric service. Methods to improve the efficiency, adequacy and reliability of the distribution system are a continual focus and every employee has an investment in each of the Company’s respective reliability metrics. In addition to the I&M Plan, Penelec utilizes core programs to support cost-effective and reliable service. These programs include, but are not limited to:

- **Vegetation Management**
 - In response to damage caused by the Emerald Ash Borer, a program to proactively remove ash trees off rights-of-way was completed in 2019. Beyond 2019, any additional ash trees are addressed under Penelec’s hazardous tree maintenance process.
 - Post-storm vegetation circuit patrols target the areas with high tree-related outages. These patrols identify trees damaged in a storm that may eventually lead to a future outage. Once identified, the tree is removed. In addition, damaged equipment identified as a part of the patrol is repaired or replaced.
- **Customers Experiencing Multiple Interruptions (“CEMI”)**
 - The CEMI program is aimed to reduce frequent or repeated outages for affected clusters of customers or frequently operated devices.
- **Load Forecasting and Distribution Planning**
 - The load forecasting application is used to estimate future substation and circuit loading based upon historical load data and the planning criteria guidelines are then used to provide a consistent approach for planning the safe, reliable, orderly, and economic expansion of the distribution system.
- **Circuit Protection**
 - The circuit protection practice is intended to provide a safe, secure distribution system; maximize distribution-system reliability performance; protect equipment and facilities from overcurrent risks

that may result in damage; and establish a consistent process and application standard for distribution system protection.

- Long-Term Infrastructure Improvement Plans (“LTIIIP”)
 - Penelec first began to execute its LTIIIP programs in 2016. These plans include expenditures and programs designed to adequately maintain and improve the efficiency, safety, adequacy, and reliability of the distribution system. Most recently, the Company filed its second LTIIIP covering the period 2020 through 2024.

Plan Revisions

Penelec submitted its I&M Plan for the period January 1, 2021, through December 31, 2022, on October 1, 2019. The Commission concluded that Penelec’s plan generally complied with the requirements in 52 Pa. Code § 57.198 and therefore approved it on January 15, 2020.

Penelec’s proposed I&M Plan for 2023 and 2024 is consistent with its previously approved plan for 2021 and 2022 and proposes no substantive changes to its inspection cycles or plan components.

Plan Consistency

Section 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 the provisions of the American National Standards Institute, Inc.*

Penelec’s I&M Plan and associated inspection activities are performed in accordance with the Occupational Safety and Health Administration’s rules and regulations, National Electrical Safety Code (“NESC”), Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission Regulations and the provisions of the American National Standards Institute, Inc., as applicable.

Record Keeping

Section 57.198(m). Record Keeping. *An electric distribution company (“EDC”) must maintain records of inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs.*

In order to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs, Penelec will maintain inspection and maintenance records either electronically or in hard copy as required by state law.

Vegetation Management

Section 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.*

Program Description

Penelec performs vegetation management on its distribution circuits in order to promote the continued safe and reliable operation of its distribution system. The vegetation management program specification is designed to support line reliability, maintain access, make repairs, or restore service and to support safe and reliable service. The vegetation management program specification prunes vegetation to achieve five years of clearance and includes removing selected incompatible trees within the clearing zone corridor; removing certain defective limbs that are overhanging primary conductors; controlling selected incompatible brush mechanically or using herbicide, or both; relieving limbs causing mechanical strain on secondary/service lines; and removal of off-corridor priority trees that are dead, dying, diseased, and leaning or significantly encroaching the corridor.

Portions of a circuit that experience high customer interruption minutes due to vegetation-caused outages may be targeted to include the removal of certain healthy limbs which overhang primary conductors based on tree species and condition.

For portions of a circuit that have not experienced significant reliability issues due to vegetation-caused outages, a proactive inspection process will target selective vegetation removal for continued reliable system operation. This may include the extension of a cycle not to exceed a total of eight years. This process involves inspection of the vegetation to evaluate the extent of potential for vegetation to interfere with energized conductors. Factors to consider in the evaluation are the voltage and height of the conductor, the type of tree, its growth rate and branching habit. Trees that will impact safety or reliability will be maintained pursuant to the vegetation management program specification.

Methods used to manage and control vegetation include manual control methods using hand-operated tools and mechanical control using equipment-mounted saws, mowers or other devices. Removing incompatible vegetation may also include various herbicide application techniques—such as, high-volume foliage application, low-volume foliage application, basal-herbicide applications, stump applications, frill application, aerial application, bare-soil-treatment application, and cut stubble applications. All herbicides shall be applied in accordance with all state, local and federal laws governing the use of herbicides.

Further detailed information regarding Penelec’s vegetation management program may be found in the Vegetation Management Distribution Specifications.

Section 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 that the deviation can be justified by the EDC’s unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.

Program Justification

In addition to complying with the provisions in Section 57.198(b), distribution vegetation management activities are performed in accordance with the Pennsylvania Pesticide Control Act, the Pennsylvania Administrative Code, and the Utility Arborist Association’s Field Guide to Closed Chain of Custody for Herbicides in the Utility Vegetation Management Industry. All vegetation management activities are designed to achieve cycle-length clearances, regardless of method employed. The vegetation management program specification seeks to maintain and control all vegetation in the space defined as the distribution clearing zone. The distribution clearing zone is the right-of-way corridor measured at a horizontal distance of fifteen feet on either side of the pole line or the established large tree edge, whichever is greater in width. The corridor is measured vertically to fifteen feet above the highest conductor attached to the pole or structure. Penelec has also applied a specific vegetation management approach to select line sections. This practice involves the removal of overhanging limbs outside the right-of-way as well as aggressive mitigation of hazardous trees, with the intent of improving tree related reliability on the selected line sections.

Penelec’s professional vegetation management staff performs inspections and approves all work conducted by vegetation management contractors. The Forestry personnel maintain an understanding of current and emerging techniques by attending industry trade conferences and maintaining memberships in industry trade organizations, such as Utility Arborist Association and the International Society of Arboriculture. The goal of the Vegetation Management department is to manage distribution corridors in a way that provides safe and reliable electricity while simultaneously working to make a sustainable habitat system on Penelec’s rights-of-way.

As part of Penelec’s approach to improving tree related reliability, the Company continues to analyze circuit electrical protection schemes and gives added attention to select line sections, such as those that serve high numbers of customers. Three distinct line sections have been identified and defined under existing protection schemes, as shown in the table below.

Zone 1	Zone 2	Zone 3
Three-phase circuitry from the circuit breaker to the first protective device	Three-phase circuitry beyond the first protective device	Single-phase and two-phase circuitry
Serves entire customer load	Serves a large percentage of customer load	Serves smallest percentage of customer load

In addition to Penelec’s Distribution Vegetation Management Program, there are other distribution equipment inspection programs (e.g., Distribution Pole Inspections, Distribution Overhead Line Inspections, Distribution Transformer Inspections and Recloser Inspections) that allow trained utility personnel multiple opportunities to observe conditions on the distribution system. These conditions may include vegetation management situations that warrant further investigation.

Inspection Plan

The total number of circuit miles to be trimmed in 2023 and 2024 is based on the current system configuration (as of 2021) and thus is subject to change by the time the 2023 and 2024 plans commence.

	Area	Inspections and Treatments Planned	
		Total Circuit Miles	
		2023	2024
Penelec <i>18,113 total circuit miles</i>	Altoona <i>1,769 total circuit miles</i>	356	347
	Clearfield <i>1,628 total circuit miles</i>	314	320
	Dubois <i>1,623 total circuit miles</i>	326	329
	Erie <i>1,715 total circuit miles</i>	432	429
	Johnstown <i>1,773 total circuit miles</i>	354	357
	Lewistown <i>1,690 total circuit miles</i>	339	345
	Oil City <i>2,051 total circuit miles</i>	405	413
	Towanda <i>4,044 total circuit miles</i>	806	791
	Warren <i>1,819 total circuit miles</i>	371	361

Distribution Pole Inspections

Section 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*

Program Description

Penelec shall visually inspect distribution wood poles on a twelve-year cycle. The purpose for inspecting distribution wood poles is to identify and repair unsafe conditions or conditions that may adversely affect service reliability or system performance, and to comply with the state regulatory agencies and the NESC.

This preventative maintenance inspection for wood poles will include a visual inspection as well as hammer-sounding as needed. The inspection consists of the recording of abnormal conditions from the groundline to the top of the pole including but not limited to the following:

- Damage – broken or leaning
- Equipment – crossarms, insulators, conductors, oil leaking
- Testing for decayed internal wood

In addition to the visual inspection, poles showing incipient decay or poles that are thirty-five years old or older will be inspected by the use of a Resistograph. The Resistograph is a sophisticated electronically controlled drill that provides increased accuracy, when compared to manual drilling, in measuring the relative density of wood in timber structures. Driven by a drill motor, a long, thin needle is inserted into the wood pole in order to assess its density, structural integrity, and shell thickness.

Further detailed information regarding Penelec’s inspection of wood poles may be found in the Distribution Inspection & Maintenance Practice – Wood Pole Groundline.

Section 57.198(n)(3). 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, then the pole shall be replaced within 30 days of the date of inspection.

Corrective Maintenance

Wood poles and supporting structures with recorded defects that Penelec could expect to create an immediate risk to public or employee safety or affect the integrity of the circuit shall be repaired or replaced within thirty days. All remaining deficiencies will be evaluated and prioritized on a case-by-case basis.

In addition, pursuant to the Pennsylvania Public Utility Commission’s Opinion and Order entered on January 16, 2020,¹ Penelec submitted a Distribution Pole Corrective Action Plan (“Pole CAP”) on March 16, 2020, which was approved by the Commission on May 21, 2020. The Pole CAP is designed to bring Penelec’s respective distribution pole replacement and reinforcement backlogs to no more than two years and is set forth in two parts. First, the Pole CAP outlines how the pole replacement/reinforcement backlog will be reduced over the period of 2020-2024 to achieve a steady state of no greater than a two-year backlog. Second, the Pole CAP outlines the quality management controls the Company will employ to ensure the Pole CAP is completed as designed and distribution poles are maintained at a no more than two-year backlog or better beginning on January 1, 2025.

Section 57.198(c). Time frames. *The plan must comply with the inspection and maintenance standards set forth 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 that the deviation can be justified by the EDC’s unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Program Justification

Penelec’s twelve-year inspection cycle for wood poles is based on accepted electric utility practices. The NESC Rule 12.121.A states “*Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary.*” Twelve years between inspections allows enough time for proper planning and remediation prior to any problems negatively impacting personal safety, equipment integrity or service reliability.

In addition to Penelec’s Distribution Pole Inspection Program, there are other distribution equipment inspection programs (e.g., Distribution Vegetation Management, Distribution Overhead Line Inspections, Distribution Transformer Inspections and Recloser

¹ Opinion and Order entered January 16, 2020, at Docket Nos. M-2019-3012618, M-2019-3012617, M-2019-3012615 and M-2019-3012614.

Inspections) that allow trained utility personnel multiple opportunities to observe conditions on the distribution system. These conditions may include distribution pole situations that warrant further investigation.

Pole Loading Calculation

As a part of the I&M Plan for the period January 1, 2021, through December 31, 2022, the Commission previously exempted Penelec from conducting pole loading calculations as a part of its pole inspections. Penelec requests a continuation of the exemption for the currently proposed period.

Rather than conducting load calculations as part of each pole inspection, Penelec follows the practice of creating base line designs using FirstEnergy's Distribution Line Construction Standards and Distribution Engineering Practices (“Construction Standards” or “Engineering Practices”). FirstEnergy’s Construction Standards are based on NESC Heavy Loading Standards and are updated each time those standards are revised. The majority of the Company’s service territory lies within the heavy loading zone. NESC Heavy Loading Standards provide basic guidance for most designs encountered by distribution line design personnel. All new facilities are designed consistent with NESC Heavy Loading Standard NESC C2-2012, Section 250. The Engineering Practices provide detailed guidance for both guying and pole loading, and additional engineering support is available to designers when more complex calculations are needed. Per the NESC, both of these resources include safety factors such that the deterioration of poles in service shall not reduce the strength capability of the pole below the required strength. Further, as the Company receives requests from other entities to attach their facilities to Penelec poles, an assessment, ranging from a visual inspection to a full-strength analysis, is performed based on pole attachment guidelines, experience and the situation encountered.

Inspection Plan

The total number of poles to be inspected in 2023 and 2024 is based on the current system configuration (as of 2021) and thus is subject to change by the time the 2023 and 2024 plans commence.

	Area	Pole Inspections Planned (Number of Poles)	
		2023	2024
Penelec <i>498,980 total poles</i>	Altoona <i>58,775 total poles</i>	4,255	5,526
	Clearfield <i>39,007 total poles</i>	2,931	3,129

Dubois <i>46,201 total poles</i>	4,876	3,986
Erie <i>73,712 total poles</i>	6,398	7,851
Johnstown <i>59,872 total poles</i>	4,417	4,839
Lewistown <i>35,849 total poles</i>	2,632	4,159
Oil City <i>57,091 total poles</i>	6,274	3,759
Towanda <i>90,544 total poles</i>	7,607	5,654
Warren <i>37,929 total poles</i>	2,191	2,679

Distribution Overhead Line Inspections

Section 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*

Program Description

Penelec shall visually inspect distribution overhead lines and equipment on a five-year cycle. The purpose for inspecting overhead lines and equipment is to identify and repair unsafe conditions or conditions that may adversely affect service reliability and to comply with the requirements of state regulatory agencies and the NESC. This program shall be limited to overhead facilities.

Circuits will be inspected on a five-year cycle to levelize labor commitments and expenses. This preventative maintenance will consist of a visual inspection and recording of abnormal conditions including but not limited to the following types of overhead circuit equipment:

- Conductors (wire and cable) – excessive slack, condition, damage, clearances
- Supporting structures (wood poles) – deteriorated condition, sustained damage (lightning, vehicle, woodpecker holes)
- Pole hardware (including insulators) – condition, damage
- Guying – condition, damage

- Pole-mounted distribution equipment (including overhead transformers) – condition, damage
- Switches
- Sectionalizers

Further detailed information regarding Penelec’s inspection of Distribution Overhead Lines may be found in the Distribution Inspection & Maintenance Practice – Overhead Circuits and Equipment.

Section 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

Supporting structures with recorded defects that Penelec could reasonably expect to affect the integrity of the circuit shall be repaired or replaced within thirty days. All remaining deficiencies will be evaluated and prioritized on a case-by-case basis.

Section 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 that the deviation can be justified by the EDC’s unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Program Justification

As a part of the I&M Plan for the period January 1, 2021, through December 31, 2022, the Commission previously granted a waiver for overhead circuit inspection periodicity. Penelec requests a continuation of the waiver for the currently proposed period.

Penelec’s five-year inspection cycle for overhead lines is based on accepted electric utility practices. The NESC Rule 12.121.A states “*Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary.*” Penelec’s experience has shown the five-year inspection cycle to be successful in addressing problems in a timely manner, allowing for proper planning and remediation prior to the problem negatively impacting personal safety, equipment integrity or service reliability.

In addition to Penelec’s Distribution Overhead Line Inspection Program, there are other distribution equipment inspection programs (e.g., Distribution Vegetation Management, Distribution Pole Inspections, Distribution Transformer Inspections and Recloser

Inspections) that allow trained utility personnel multiple opportunities to observe conditions on the distribution system. Further, field personnel perform circuit assessments to address specific reliability concerns and to assess worst performing circuit performance. Lastly, Penelec may use infrared thermography on an as-needed basis on certain worst performing circuits or while performing circuit rehabilitation.

Inspection Plan

The total number of circuits to be inspected in 2023 and 2024 is based on the current system configuration (as of 2021) and thus is subject to change by the time the 2023 and 2024 plans commence.

	Area	Overhead Line Inspections Planned (Number of Circuits)	
		2023	2024
Penelec <i>1,244 total circuits</i>	Altoona <i>175 total circuits</i>	36	37
	Clearfield <i>64 total circuits</i>	12	14
	Dubois <i>95 total circuits</i>	23	19
	Erie <i>199 total circuits</i>	39	38
	Johnstown <i>134 total circuits</i>	26	27
	Lewistown <i>81 total circuits</i>	15	15
	Oil City <i>141 total circuits</i>	27	28
	Towanda <i>256 total circuits</i>	52	53
	Warren <i>96 total circuits</i>	19	20

Distribution Transformer Inspections

Section 57.198(n)(6). Distribution transformer inspections. *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*

Program Description

Penelec inspects overhead distribution transformers as part of the overhead line inspection. Above-ground, pad-mounted transformers are inspected on a five-year cycle and below-ground transformers are inspected on an eight-year cycle. The purpose for inspecting distribution transformers is to identify and repair unsafe conditions or conditions that may adversely affect service reliability, and to comply with the requirements of state regulatory agencies and the NESC.

Overhead distribution transformers – visual inspection and recording of abnormal conditions including but not limited to the following:

- Equipment condition – oil leakage, arresters, rust, dents or evidence of contact

Above-ground pad-mounted equipment (transformers and switchgear) – inspection and recording of abnormal conditions including but not limited to the following:

- Equipment condition – oil leakage, cabinet damage, holes, washout
- Security – locking mechanisms
- Accessibility – as required for operation and maintenance purposes, including the installation of fences or shrubbery that could adversely affect access to and operation of the transformer and unauthorized excavation or changes in grade near the transformer
- Warning labels – electrical hazard warning label and landscaping instructions notice

Below-ground transformers – visual inspection and recording of abnormal conditions including but not limited to the following:

- Accessibility – verify cover is secured

- Equipment condition – visually inspect baffle

Further detailed information regarding Penelec’s inspection of distribution transformers may be found in the Distribution Inspection & Maintenance Practice – Underground Equipment.

***Section 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 that the deviation can be justified by the EDC’s unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Program Justification

As a part of the I&M Plan for the period January 1, 2021, through December 31, 2022, the Commission previously granted a waiver for distribution transformer inspection periodicity. Penelec requests a continuation of the waiver for the currently proposed period.

Penelec’s five- and eight-year inspection cycles for distribution transformers are based on accepted electric utility practices and the experience of Penelec. The NESC Rule 12.121.A states “*Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary.*”

Penelec’s experience has proven the inspection cycles above to be successful in addressing problems in a timely manner, allowing for proper planning and remediation prior to the problem negatively impacting personal safety, equipment integrity or service reliability.

In addition to Penelec’s Distribution Transformer Inspections Program, there are other distribution equipment inspection programs (e.g., Distribution Vegetation Management, Distribution Pole Inspections, and Recloser Inspections) that allow trained utility personnel multiple opportunities to observe conditions on the distribution system. These conditions may include distribution transformer situations that warrant further investigation.

Inspection Plan

The total number of distribution transformers to be inspected in 2023 and 2024 is based on the current system configuration (as of 2021) and thus is subject to change by the time the 2023 and 2024 plans commence.

	Area	Type	Transformer Inspections Planned (Total Number of Transformers)	
			2023	2024
Penelec 201,112 total transformers	Altoona 29,473 total transformers	Overhead Transformers 24,123 total transformers	4,588	5,270
		Above-Ground Pad-mounted 5,070 total transformers	983	1,013
		Below-Ground Transformers 280 total transformers	57	49
	Clearfield 17,196 total transformers	Overhead Transformers 15,616 total transformers	2,911	2,591
		Above-Ground Pad-mounted 1,445 total transformers	263	334
		Below-Ground Transformers 135 total transformers	31	17
	Dubois 17,292 total transformers	Overhead Transformers 14,907 total transformers	3,283	2,922
		Above-Ground Pad-mounted 2,217 total transformers	608	349
		Below-Ground Transformers 168 total transformers	46	33
	Erie 27,956 total transformers	Overhead Transformers 22,618 total transformers	4,307	4,360
		Above-Ground Pad-mounted 5,221 total transformers	1,230	854
		Below-Ground Transformers 117 total transformers	31	21
	Johnstown 23,538 total transformers	Overhead Transformers 19,997 total transformers	3,773	4,325
		Above-Ground Pad-mounted 3,360 total transformers	562	622
		Below-Ground Transformers 181 total transformers	21	44
	Overhead Transformers 13,672 total transformers	2,650	2,142	

	Lewistown <i>16,560 total transformers</i>	Above-Ground Pad-mounted <i>2,721 total transformers</i>	511	496
		Below-Ground Transformers <i>167 total transformers</i>	41	39
	Oil City <i>21,134 total transformers</i>	Overhead Transformers <i>18,580 total transformers</i>	4,376	3,981
		Above-Ground Pad-mounted <i>2,390 total transformers</i>	582	579
		Below-Ground Transformers <i>164 total transformers</i>	14	57
	Towanda <i>34,512 total transformers</i>	Overhead Transformers <i>31,274 total transformers</i>	6,665	7,579
		Above-Ground Pad-mounted <i>3,024 total transformers</i>	570	656
		Below-Ground Transformers <i>214 total transformers</i>	28	32
	Warren <i>13,451 total transformers</i>	Overhead Transformers <i>12,296 total transformers</i>	1,970	2,142
		Above-Ground Pad-mounted <i>1,138 total transformers</i>	305	193
		Below-Ground Transformers <i>17 total transformers</i>	11	2

Recloser Inspections

Section 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.*

Program Description

Penelec visually inspects distribution line reclosers annually. The purpose for inspecting distribution line reclosers is to identify and repair unsafe conditions or conditions that may adversely affect service reliability or system performance, and to comply with the requirements of state regulatory agencies and the NESC.

The annual preventative maintenance consists of counter readings and field inspection. The counter readings are obtained to assess system performance based on the number of operations. The field inspection includes but is not limited to the following:

- Type of recloser and current rating
- Counter reading
- Condition – rust, dents, physical damage, leaks, lightning damage
- Equipment – surge arresters, tank-ground connections, by-pass switches, control battery, pole
- Grounds – damage, condition

Further detailed information regarding Penelec's inspection of reclosers may be found in the Distribution Inspection & Maintenance Practice – Line Reclosers.

Section 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 that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Program Justification

Penelec's annual inspection cycle for reclosers is based on accepted electric utility practices and the experience of Penelec. The NESC Rule 12.121.A states "Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary." One year between inspection cycles has proven to be successful in addressing problems in a timely manner, allowing for proper planning and remediation

prior to the problem negatively impacting personal safety, equipment integrity or service reliability.

In addition to Penelec's Recloser Inspections Program, there are other distribution equipment inspection programs (e.g., Distribution Vegetation Management, Distribution Pole Inspections, Distribution Overhead Line Inspections, and Distribution Transformer Inspections) that allow trained utility personnel multiple opportunities to observe conditions on the distribution system. These conditions may include recloser equipment situations that warrant further investigation.

Inspection Plan

The total number of recloser units to be inspected in 2023 and 2024 is based on the current system configuration (as of 2021) and thus is subject to change by the time the 2023 and 2024 plans commence.

	Area	Type	Recloser Inspections Planned <i>Total Number of Reclosers</i>	
			2023	2024
Penelec 2,593 total reclosers	Altoona 353 total reclosers	Single Phase <i>257 total reclosers</i>	257	257
		Three Phase <i>96 total reclosers</i>	96	96
	Clearfield 272 total reclosers	Single Phase <i>223 total reclosers</i>	223	223
		Three Phase <i>49 total reclosers</i>	49	49
	Dubois 143 total reclosers	Single Phase <i>80 total reclosers</i>	80	80
		Three Phase <i>63 total reclosers</i>	63	63
	Erie 447 total reclosers	Single Phase <i>318 total reclosers</i>	318	318
		Three Phase <i>129 total reclosers</i>	129	129
	Johnstown 131 total reclosers	Single Phase <i>42 total reclosers</i>	42	42
		Three Phase <i>89 total reclosers</i>	89	89
	Lewistown 177 total reclosers	Single Phase <i>140 total reclosers</i>	140	140
		Three Phase <i>37 total reclosers</i>	37	37
	Oil City 414 total reclosers	Single Phase <i>343 total reclosers</i>	343	343
		Three Phase <i>71 total reclosers</i>	71	71
	Towanda 419 total reclosers	Single Phase <i>328 total reclosers</i>	328	328
		Three Phase <i>91 total reclosers</i>	91	91
	Warren 237 total reclosers	Single Phase <i>198 total reclosers</i>	198	198
		Three Phase <i>39 total reclosers</i>	39	39

Substation Inspections

Section 57.198(n)(8). Substation inspections. *Substation equipment, structures and hardware shall be inspected on a cycle of 5 weeks or less.*

Program Description

Penelec inspects its distribution substations twelve times annually. The purpose of these monthly inspections of the distribution substations is to ensure that any developing substation problems are identified and addressed in a timely manner in support of system reliability and electrical safety.

There are three types of preventative maintenance inspections that are performed at Penelec substations during a twelve-month period. The chart below illustrates the type of inspection performed each month²:

Inspection Type	Month											
	1	2	3	4	5	6	7	8	9	10	11	12
Safety and Security of Facilities/Visual Equipment Inspection/Reporting and Recording of Deficiencies and Relay Operations (Class C)	X	X	X	X	X	X	X	X	X	X	X	X
Safety/Security, Visual Equipment Inspection and Record Readings (Class B)			X			X			X			X
Seasonal Maintenance (Class A)			X						X			

The following is a summary of each type of inspection that is conducted at Penelec substations:

1. *Safety and Security of Facilities and Visual Equipment Inspection of Electrical Equipment and Reporting/Recording Identified Deficiencies and Relay Operations (Class C).* Monthly visual inspection of substation equipment, structures and hardware that also includes the recording of abnormal conditions or deficiencies. This inspection may include but is not limited to the following:
 - General condition – read and record ambient temperature
 - Perimeter fence inspection (gate locks, fence and gate grounds, warning signs)

² For illustrative purposes only.

- Yard and facility inspection (equipment grounds, vegetation condition, general yard condition, equipment condition, oil levels and leaks, structure/hardware condition, hotspots, conductors/switches/connections)
 - Building inspection (security, integrity, indication lights)
 - Visual inspection of major equipment (power transformers, circuit breakers, instrument transformers, etc.)
 - Relays, electronic controls, and panel meters for alarms and targets
 - Batteries and chargers
2. *Safety and Security, Visual Equipment Inspection and Record Readings (Class B).* In addition to the safety and security and visual equipment inspection that is performed monthly, every three months an additional visual inspection that includes the recording of readings is performed. This inspection may include but is not limited to all items listed under the Class C inspection as well as the following types of substation equipment:
- Recording of amps and load readings
 - Recording of counter and gauge readings
 - Inspection/test of carrier communication equipment
 - Inspection of microwave/radio sites and engine generators – generator alarms and battery
3. *Seasonal Maintenance - Summer and Winter Readiness (Class A).* In addition to the monthly and three-month inspections, every six months a more comprehensive inspection of the substation and substation equipment is performed. This inspection may include but is not limited to all items listed under the Class C and B inspections as well as the following types of substation equipment:
- Servicing fire protection equipment
 - Servicing eye wash stations
 - Yard lighting
 - Servicing filters and HVAC systems
 - Servicing of equipment cabinet heaters
 - Servicing engine generators

Further detailed information regarding Penelec’s inspection of substations may be found in Section 20P – Substation Patrol Inspection of the Substation Maintenance Practice and Methods.

Section 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 that the deviation can be justified by the EDC’s unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Program Justification

Patrol inspections of distribution substations are performed on a monthly, quarterly and semi-annual basis, with a tiered approach to preventative maintenance. This tiered approach has proven effective in addressing emerging problems and allows for proper planning and remediation prior to the problem negatively impacting personal safety, equipment integrity or service reliability.

Monthly inspections ensure a trained, physical presence within the substation. Frequent, in-person inspections have been effective in detecting the degradation of facilities not always captured by existing local and remote surveillance and monitoring tools. In addition to visual inspections, load and counter readings are recorded every three months to allow local engineering to conduct planning and load studies. Finally, an intensive inspection is conducted two times a year, in spring and fall.

Advancements in technology have refined how substation equipment inspections are performed, and those advancements have been leveraged to ensure the highest levels of safety and reliability of the substation and substation equipment. For example, results from equipment and patrol inspections are captured by field personnel on site and entered directly into the maintenance database where they can be tracked. Through the use of historical inspection data and enhanced software, Penelec is able to target specific equipment and trigger maintenance based on equipment condition. For example, counter readings that are obtained during the three-month inspection cycle are used to trigger condition-based maintenance. Both predictive and condition-based programs extend the operating life of the equipment. They also optimize the necessary maintenance interval, improve service reliability, and reduce downtime that is typically experienced when equipment is taken offline which reduces exposure of the grid, all with consistency and efficiency.

Inspection Plan

The total number of substations to be inspected in 2023 and 2024 is based on the current system configuration (as of 2021) and thus is subject to change by the time the 2023 and 2024 plans commence.

	Area	Substation Inspections Planned <i>Number of Substations</i>	
		2023	2024
Penelec <i>392 total substations</i>	Altoona <i>63 substations</i>	756	756
	Clearfield <i>50 substations</i>	600	600
	Erie <i>41 substations</i>	492	492
	Indiana <i>11 substations</i>	132	132
	Lewistown <i>42 substations</i>	504	504
	Mansfield <i>21 substations</i>	252	252
	Oil City <i>35 substations</i>	420	420
	Richland <i>47 substations</i>	564	564
	Towanda <i>28 substations</i>	336	336
	Warren <i>26 substations</i>	312	312



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



IN REPLY PLEASE
REFER TO OUR FILE

December 21, 2021

Docket No. M-2009-2094773

TORI GIESLER
ATTORNEY, FIRST ENERGY
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Re: Pennsylvania Electric Company's Biennial Inspection, Maintenance, Repair and Replacement Plan (2023 through 2024) Docket No. M-2009-2094773

Dear Ms. Giesler:

On October 1, 2021, Pennsylvania Electric Company ("Penelec") 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, 2023.

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 Penelec as one of five EDCs in Compliance Group 1 which must file their seventh biennial Plan by October 1, 2021. The Plan must cover the two calendar years beginning 15 months after filing and remain in effect for two calendar years thereafter (January 1, 2023, through December 31, 2024).

Penelec's I&M Plan for 2023 and 2024 is consistent with its previously approved plan for 2021 through 2022 and proposes no substantive changes.

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.

Penelec's Plan states it complies with 52 Pa. Code § 57.198(b) requirements.

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.

Penelec continues previously approved modifications, discussed *infra*, for the following programs, or parts of programs:

- Pole inspections
- Distribution overhead line inspection interval
- Distribution overhead 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 subsection (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.

Penelec's Plan states it complies with 52 Pa. Code § 57.198(m) requirement.

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.

The Plan includes three vegetation management methods for promoting safe and reliable operation of their distribution system. The first method is the Standard Specification, which provides vegetation to be pruned to achieve a five (5) year cycle for clearance. This includes: removal of selected incompatible trees within the clearing zone corridor; removal of certain defective limbs that are overhanging primary conductors; controlling selected incompatible brush mechanically and/or using herbicide; and removal of off-corridor priority trees that are dead, dying, diseased, and leaning or significantly encroaching the corridor. The Standard Specification is used on portions of circuits that experience high customer interruption minutes due to vegetation-caused outages.

Penelec utilizes the second method, Enhanced Specification, on targeted circuit locations that experience high customer interruption minutes due to vegetation-caused outages. The Enhanced Specification includes the methods from the Standard Specification plus the removal of certain healthy limbs that overhang primary conductors.

Penelec utilizes the third method, Inspect/Maintain, for portions of circuits that have not experienced significant reliability issues due to vegetation-caused outages. The process involves inspection of vegetation around the circuits and removal of vegetation that has the potential for interference with conductors. The Inspect/Maintain process targets selective vegetation removal on a cycle which will not exceed eight (8) years.

Penelec'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 Penelec will visually inspect distribution wood poles on a 12-year cycle. The preventative maintenance inspection for wood poles will include a visual inspection as well as hammer-sounding as needed. The inspection consists of the recording of abnormal conditions from the groundline to the top of the pole, including damage (broken or leaning), equipment (crossarms, insulators, conductors, oil leaking), and testing for decayed internal wood. Poles showing incipient decay or poles that are 35 years old or older will be bored to further assess the condition of the pole.

Penelec included a previously approved exemption from performing pole load calculations as part of pole inspections.

Penelec's Plan 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.

The Plan states that wood poles and supporting structures with recorded defects that Penelec could reasonably expect to endanger life or property will be repaired or replaced within 30 days. All remaining deficiencies will be evaluated and prioritized on a case-by-case basis.

Penelec'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.*

Penelec's Plan includes a previously approved exemption for a five (5) year inspection cycle, rather than the required one to two (1-2) year cycle. During this inspection cycle, Penelec has added switches and sectionalizers to their overhead line inspection plan, which is an addition from its previously approved plan.

Penelec's Plan 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.

The Plan states that supporting structures with recorded defects that Penelec could reasonably expect to affect the integrity of the circuit shall be repaired/replaced within 30 days. All remaining deficiencies will be evaluated and prioritized on a case-by-case basis.

Penelec'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.*

Penelec's Plan includes a previously approved exemption for a five (5) year inspection cycle for overhead transformers, consistent with their overhead line inspection cycle, instead of the required one to two (1-2) year cycle. Penelec will inspect above-ground pad-mounted transformers on a five (5) year cycle and below-ground transformers on an eight (8) year cycle.

Penelec's Plan generally 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.

The Plan states that Penelec visually inspects distribution line reclosers annually and this practice is the same for all FirstEnergy companies.

Penelec'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.

Penelec's Plan includes inspections on monthly, quarterly, and biannual intervals. Safety and security inspections are conducted monthly; readings of currents, etc. are performed quarterly; and a more comprehensive inspection of substation equipment are performed biannually. This Plan is consistent with all FirstEnergy companies.

Penelec's Plan generally complies with section 57.198(n)(8).


Conclusion

Upon review of Penelec's Biennial Inspection, Maintenance, Repair and Replacement Plan filed on October 1, 2021, it appears that the filing generally complies to the requirements of 52 Pa. Code § 57.198. Furthermore, as discussed *supra*, the previously approved exemptions requested by Penelec may continue. These approvals are 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, 2023, through December 31, 2024. Penelec 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 Penelec's quarterly reliability report 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 Harry R. Bidelspach, Sr., Electrical Reliability Engineer, Bureau of Technical Utility Services at (717) 425-7401, or hbidelspac@pa.gov

Sincerely,



Rosemary Chiavetta
Secretary

cc: Kriss Brown, LAW
John Van Zant, TUS
Dan Searfoorce, TUS
Harry Bidelspach, TUS
Brent Killian, BIE
Scott R. Wyman, FirstEnergy, wymans@firstenergycorp.com

Jame G. Day
1206 Station Hill Road
Nicholson PA, 18446
Account No. [REDACTED]



2022 Tree Work and Maintenance on Nicholson Circuit
Started: 02/07/22
Completed: 02/12/22

Off ROW: 56 trees removed

On ROW: 0 trees removed

Ash trees removed: 56 trees

Total # of trees removed: 56 trees

Total # of trees trimmed: 1 tree

Miles maintained along Nicholson Circuit: 11.89 miles

Jame G. Day
1206 Station Hill Road
Nicholson PA, 18446
Account No. [REDACTED]



2024 Tree Work and Maintenance on Nicholson Circuit
Started: 08/06/24
Completed: 08/31/24

Off ROW: 63 trees removed
On ROW: 43 trees removed
Ash trees removed: 47 trees
Total # of trees removed: 106 trees
Total # of trees trimmed: 1,120 trees

Miles maintained along Nicholson Circuit: 11.89 miles