



UGI Utilities, Inc.  
1 UGI Drive  
Denver, PA 17517

October 1, 2025

**VIA E-FILING**

Matthew Homsher, Esq., Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**RE: Inspection, Maintenance, Repair and Replacement Standards for Electric Distribution Companies, Docket No. M-2009-2094773  
Biennial Filing of UGI Utilities, Inc. – Electric Division for the period of January 1, 2027, through December 31, 2028, pursuant to 52 Pa. Code §57.198**

Dear Secretary Homsher:

Pursuant to 52 Pa. Code §57.198(a), please find the enclosed UGI Utilities, Inc. – Electric Division’s Biennial Plan for the Periodic Inspection, Maintenance, Repair and Replacement of Facilities for the period of January 1, 2027, through December 31, 2028 (the “Plan”).

Should you have any questions concerning this filing, please feel free to contact Kyle Stair at (570) 407-2641 or email [kstair@ugi.com](mailto:kstair@ugi.com).

Sincerely,

Vincent Degiusto  
Senior Director - Electric Division

cc: **VIA ELECTRONIC MAIL**

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**VERIFICATION**

I, Vincent A. Degiusto Jr., Sr. Director, UGI Utilities, Inc., - Electric Division, hereby state that the facts set forth in the foregoing are true and correct to the best of my knowledge, information and belief; and that I expect said UGI Utilities, Inc. to be able to prove the same at any hearing held in this matter. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsifications to authorities).



Vincent A. Degiusto Jr.  
Sr. Director, UGI Utilities, Inc. – Electric Division

Date: October 1, 2025

**Biennial Inspection, Maintenance, Repair and Replacement Plan  
of UGI Utilities, Inc. – Electric Division  
For the Period of January 1, 2027 – December 31, 2028**

**Submitted by:**

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**Dated: October 1, 2025**

# UGI Utilities, Inc.

## 2027 – 2028 Inspection and Maintenance Plan

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### **Introduction**

UGI Utilities Inc., - Electric Division (“UGI Electric” or the “Company”) hereby submits this Biennial Inspection and Maintenance Plan (“I&M Plan” or the “Plan”), pursuant to 52 Pa. Code § 57.198, for the periodic inspection, maintenance, repair, and replacement of its facilities (during the January 1, 2027, through December 31, 2028, period). The I&M Plan is designed to facilitate the Company’s compliance with the reliability performance benchmarks and standards established by the Pennsylvania Public Utility Commission (“Commission”).

### **I&M Plan**

***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.*

UGI Electric’s Plan is 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. as applicable to the work performed.

***Section 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.*

UGI Electric maintains records of its biennial inspection and maintenance activities in the form of date-stamped paper or electronic records (i.e., work orders and associated timesheets) with the name of the UGI Electric employee that completed the relevant tasks (e.g., inspection, maintenance, repair, and replacement activities). The Company also maintains receipts and/or equivalent computer-based records with the name of independent contractors that similarly complete relevant inspection and maintenance tasks for the Company (including the nature of the work performed).

# UGI Utilities, Inc.

## 2027 – 2028 Inspection and Maintenance Plan

**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.*

### Vegetation Management Line Inspection

UGI Electric has fifty (52) overhead distribution circuits on its system. The total miles of overhead primary line on these circuits is approximately 1,113 miles. The circuits are all located in Luzerne and Wyoming Counties, Pennsylvania.

UGI Electric performs a vegetation management inspection on approximately half the total circuit mileage each year ensuring a complete inspection of all overhead facilities every two years. The purpose of the vegetation management inspection is to assess the condition of vegetation on and off the primary lines' right of ways to identify situations that may pose a threat to reliability or may damage overhead distribution facilities. The inspection schedule for 2027 and 2028 is shown below:

UGI Utilities Inc.		Vegetation Management Line Inspection Planned Circuit Miles	
Feeder Count	Feeder Name	<i>Approximately 1,113 (total circuit miles)</i>	
		2027	2028
1	Courtdale 8000	0	39.09
2	Courtdale 8002	0	8.77
3	Courtdale 8003	0	5.88
4	Dallas 350	0	5.67
5	Dallas 1930	0	11.64
6	Dallas 1954	0	11.63
7	Glenview 370	0	1.39
8	Glenview 372	0	18.57
9	Glenview 8004	0	43.54
10	Hanover 70	8.59	0
11	Hanover 75	1.75	0
12	Hanover 8005	2.84	0
13	Hunlock 419	20.23	0
14	Hunlock 420	114.28	0
15	Hunlock 421	52.96	0

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16	Huntsville 240	0	23.86
17	Huntsville 242	0	32.62
18	Huntsville 244	0	80.35
19	Huntsville 757	0	12.51
20	Huntsville 759	0	22.24
21	Kingston 315	0	7.75
22	Kingston 1215	0	4.30
23	Kingston 2530	0	8.90
24	Kingston 2550	0	4.57
25	Kingston 2555	0	1.79
26	Koonsville 7536	36.08	0
27	Koonsville 7540	167.65	0
28	Koonsville 7576	30.79	0
29	Kunkle 500	0	31.95
30	Kunkle 510	0	41.26
31	Kunkle 520	0	49.59
32	Lincoln 602	4.87	0
33	Lincoln 603	8.69	0
34	Lincoln 604	16.44	0
35	Lincoln 606	5.46	0
36	Loomis 102	6.11	0
37	Loomis 103	10.56	0
38	Loomis 104	0.71	0
39	Loomis 202	6.21	0
40	Loomis 203	4.50	0
41	Loomis 204	0.50	0
42	Plymouth 10	6.38	0
43	Plymouth 23	10.67	0
44	Plymouth 45	15.67	0
45	Plymouth 67	5.81	0
46	Plymouth 80	41.12	0
47	Swoyersville 116	0	11.02
48	Swoyersville 147	0	20.36
49	Swoyersville 216	0	6.17
50	Swoyersville 237	0	5.63

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51	Swoyersville 247	0	12.06
52	Swoyersville 347	0	11.09
Total Overhead Circuit Miles		578.86	534.20

### Vegetation Management Treatment Plan

UGI Electric develops a condition-based vegetation management treatment plan each year. This plan is based largely on the results of its vegetation management line inspections (from the previous year). In addition, the Company reviews the number of tree-related interruptions on feeders (that were inspected in the prior year) and updates their established maintenance cycles (as needed).

For the 2027 and 2028 Plan years, UGI Electric plans to perform vegetation maintenance work on 150-200 miles of distribution overhead lines per year. This work involves:

- Routine trimming/pruning of vegetation along each circuit per the appropriate specification for the right-of-ways.
- Distribution herbicide application to limit growth of brush under conductors and along right-of-ways. UGI Electric plans to chemically treat approximately 50-100 acres of distribution overhead lines each year.
- An active Danger Tree Removal Program mainly focuses on the removal of dead or declining trees on and off-road right-of-ways (when authorized by the landowner) that pose a threat to UGI Electric overhead facilities.

Further details can be found in Section 5 of UGI Electric’s Transmission and Distribution (“T&D”) Engineering Instruction Manual and the UGI Herbicide Use Policy.

### Vegetation Treatment Cycle

UGI Electric has established vegetation line treatment cycle times for its distribution circuits. The cycle times result from the completion of the vegetation management treatment plan described above. The treatment cycles range from 4 to 8 years. The expected treatment cycles for each of UGI Electric’s fifty (52) overhead distribution circuits are shown in the table below:

Feeder Count	Feeder Name	EXPECTED TREATMENT CYCLE (Years)
1	Courtdale 8000	6

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2	Courtdale 8002	6
3	Courtdale 8003	6
4	Dallas 350	6
5	Dallas 1930	6
6	Dallas 1954	6
7	Glenview 370	6
8	Glenview 372	6
9	Glenview 8004	6
10	Hanover 70	6
11	Hanover 75	6
12	Hanover 8005	6
13	Hunlock 419	6
14	Hunlock 420	7
15	Hunlock 421	7
16	Huntsville 240	7
17	Huntsville 242	7
18	Huntsville 244	7
19	Huntsville 757	6
20	Huntsville 759	6
21	Kingston 315	4
22	Kingston 1215	4
23	Kingston 2530	4
24	Kingston 2550	4
25	Kingston 2555	4
26	Koonsville 7536	6
27	Koonsville 7540	8
28	Koonsville 7576	8
29	Kunkle 500	7
30	Kunkle 510	7
31	Kunkle 520	6
32	Lincoln St 602	5
33	Lincoln St 603	5
34	Lincoln St 604	5
35	Lincoln St 606	5
36	Loomis 102	4
37	Loomis 103	4
38	Loomis 104	4
39	Loomis 202	4
40	Loomis 203	4
41	Loomis 204	4
42	Plymouth 10	5

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43	Plymouth 23	5
44	Plymouth 45	5
45	Plymouth 67	5
46	Plymouth 80	6
47	Swoyersville 116	5
48	Swoyersville 147	5
49	Swoyersville 216	5
50	Swoyersville 237	5
51	Swoyersville 247	5
52	Swoyersville 347	5

Justification (per Section 57.198 (c))

This inspection plan complies with the Statewide minimum inspection and treatment cycle of between 4-8 years for distribution facilities per Section 57.198(n)(1). Moreover, the Company’s vegetation management is performed in accordance with ANSI A300 and Z133 Standards, utilizing generally accepted industry practices.

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## 2027 – 2028 Inspection and Maintenance Plan

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**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 inspection 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

UGI Electric inspects all distribution poles on a 10 to 12-year cycle which reflects the nearly 49,000 wood poles on the UGI system. These inspections maintain system reliability and safety by ensuring that all poles meet or exceed minimum strength requirements to support their attached facilities. The inspections also ensure that the poles and attachments are free from damage and environmental conditions that could compromise these facilities. A maintenance and treatment program (done in conjunction with the distribution pole inspections) aims to extend the useful life of poles.

All poles are inspected for decay, damage, and other potential hazards associated with electrical equipment. Poles suspected of having internal decay are inspected by the sound and bore method. Poles manufactured more than 20 years before their inspection date are inspected below ground level whenever possible. (i.e., accessible and not installed in concrete or asphalt). The remaining strength of the pole (as compared to the original pole strength when installed) is calculated using data gathered from the inspection. If the remaining strength of the pole is found to be deficient, the pole is classified as: 1) a reject pole (a pole that fails the ground-line inspection but does not meet the criteria found in Section 57.198(n)(3) of the Pennsylvania Code); 2) a re-enforceable reject pole (a pole that can be restored to an acceptable strength when re-enforced with a steel truss or similar device); or 3) a danger pole (danger poles meet the criteria found in Section 57.198(n)(3)).

Further details can be found in UGI Electric's T&D Engineering Instruction Manual, Section 10.8.

### Pole Inspection Plan

<b>UGI Utilities, Inc.</b>	<b>Pole Inspections Planned</b>
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	2027	2028
Inspection Area <i>Projected on a 12-year cycle*</i>	Zone 1 (21 maps) which generally includes all or portions of: Edwardsville Borough, Kingston Borough, Luzerne Borough, Pringle Borough, Forty Fort Borough, Noxen Township, Kingston Township	Zone 2 (9 maps) which generally includes all or portions of: Kingston Borough, Plymouth Borough, Larksville Borough, Edwardsville Borough, Pringle Borough, Kingston Township
Approximate Number of Poles	3,800	4,200

\*Note – The annual pole inspections are performed in pre-defined areas of the UGI system which are organized into twelve zones reflective of the 12-yr inspection cycle.

Justification (per Section 57.198 (c))

UGI requests a continued waiver from the pole loading calculation requirement under Section 57.198(n)(2)(vi) due to construction standards that at a minimum, require the use of a Class 3, 40-foot pole for primary construction and more typically a Class 2, 45-foot pole based on the need for additional pole space. This waiver had been previously approved during the 2021-2022 inspection plan and continued to be granted through the 2023-2026 plans based on findings that pole failures accounted for only a miniscule number of interruptions and customer minutes interrupted. The inclusion of pole loading calculations would result in a significant cost increase relative to the inspection and maintenance program without an appreciable increase in reliability.

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## 2027 – 2028 Inspection and Maintenance Plan

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***Section 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.*

### Corrective Maintenance

Pole inspections that result in a Section 57.198(n)(3) determination are brought to the attention of UGI Electric’s program administrator and prioritized accordingly. UGI Electric replaces these poles within 30 days of the date of inspection. Poles classified as rejects, that are not considered an immediate priority, are scheduled for replacement based on criticality. UGI Electric continues to see an elevated number of pole reject rates in recent years, which has resulted in an accelerated pole replacement program under the UGI Electric Long-Term Infrastructure Improvement Plan (“LTIIIP”).

### Justification (per Section 57.198 (c))

UGI Electric’s Corrective Maintenance Program meets the requirements of 52 Pa. Code § 57.198 (n)(3).

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## 2027 – 2028 Inspection and Maintenance Plan

**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 distribution line.*
- III. *Other conditions that may adversely affect operation of the overhead distribution line.*

### Program Description

UGI Electric inspects its overhead distribution facilities by ground patrol every two years. The purpose of the inspection program is to verify that the overhead facilities are in a safe, operational, and reliable condition. The inspections are performed by qualified Company representatives or approved contractors. The overhead lines and equipment are inspected for damage including broken insulators, failed cross-arms, leaks, and any other conditions which may adversely affect the distribution system. Inspection information is documented and forwarded to the appropriate engineering department when corrective action is required.

Further details can be found in UGI Electric’s T&D Engineering Instruction Manual, Section 02-02.

### Distribution Overhead Line Inspection Plan

UGI Utilities Inc.		Overhead Line Inspection Plan	
		Planned Circuit Miles	
Feeder Count	Feeder Name	<i>Approximately 1,113 (total circuit miles)</i>	
		2027	2028
1	Courtdale 8000	0	39.09
2	Courtdale 8002	0	8.77
3	Courtdale 8003	0	5.88
4	Dallas 350	0	5.67
5	Dallas 1930	0	11.64
6	Dallas 1954	0	11.63
7	Glenview 370	0	1.39
8	Glenview 372	0	18.57
9	Glenview 8004	0	43.54
10	Hanover 70	8.59	0
11	Hanover 75	1.75	0
12	Hanover 8005	2.84	0

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13	Hunlock 419	20.23	0
14	Hunlock 420	114.28	0
15	Hunlock 421	52.96	0
16	Huntsville 240	0	23.86
17	Huntsville 242	0	32.62
18	Huntsville 244	0	80.35
19	Huntsville 757	0	12.51
20	Huntsville 759	0	22.24
21	Kingston 315	0	7.75
22	Kingston 1215	0	4.30
23	Kingston 2530	0	8.90
24	Kingston 2550	0	4.57
25	Kingston 2555	0	1.79
26	Koonsville 7536	36.08	0
27	Koonsville 7540	167.65	0
28	Koonsville 7576	30.79	0
29	Kunkle 500	0	31.95
30	Kunkle 510	0	41.26
31	Kunkle 520	0	49.59
32	Lincoln 602	4.87	0
33	Lincoln 603	8.69	0
34	Lincoln 604	16.44	0
35	Lincoln 606	5.46	0
36	Loomis 102	6.11	0
37	Loomis 103	10.56	0
38	Loomis 104	0.71	0
39	Loomis 202	6.21	0
40	Loomis 203	4.50	0
41	Loomis 204	0.50	0
42	Plymouth 10	6.38	0
43	Plymouth 23	10.67	0
44	Plymouth 45	15.67	0
45	Plymouth 67	5.81	0
46	Plymouth 80	41.12	0
47	Swoyersville 116	0	11.02

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48	Swoyersville 147	0	20.36
49	Swoyersville 216	0	6.17
50	Swoyersville 237	0	5.63
51	Swoyersville 247	0	12.06
52	Swoyersville 347	0	11.09
Total Overhead Circuit Miles		578.86	534.20

Justification (per Section 57.198 (c))

UGI's Distribution Overhead Line Inspection Plan meets the requirements of 52 Pa. Code § 57.198 (n) (4).

# UGI Utilities, Inc.

## 2027 – 2028 Inspection and Maintenance Plan

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***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

Any deficiencies on UGI Electric's overhead distribution system, discovered during performance of its Distribution Overhead Line Inspections, are addressed based on the severity of the situation. Those items that may affect the integrity of circuits are repaired or replaced within 30 days of discovery. Safety issues are addressed immediately.

### Justification (per Section 57.198 (c))

UGI Electric's Distribution Overhead Line Inspection Plan meets the requirements of 52 Pa. Code § 57.198 (n) (5).

# UGI Utilities, Inc.

## 2027 – 2028 Inspection and Maintenance Plan

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**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) *Installations 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

UGI Electric inspects all its overhead distribution transformers on a two-year cycle as part of the overhead distribution line inspection program.

UGI Electric inspects padmount and below ground transformers on a five-year cycle. The purpose of the inspection is to verify that all transformers are in a safe, operational, and reliable condition. The inspections are performed by qualified Company representatives or approved contractors. The inspectors look for rust, dents and other evidence of contact, leaking oil, installations of fences and shrubbery that could adversely affect access to and operation of the transformer, unauthorized excavations or changes in grade near the transformer, and any other conditions which may affect the safety, access to or operation of the transformer.

Inspection information is documented and conditions that require follow up are forwarded to the Engineering department for corrective action. Safety related issues are corrected immediately. Other reported problems are handled based on the severity of the situation.

Further details can be found in UGI Electric’s T&D Utilities Engineering Instruction Manual, Section 02-08.

### Distribution Transformer Inspection Plan

UGI Utilities, Inc.	Overhead Transformer Inspections Planned		
	Feeder	Overhead Transformer/Feeder	
		2027	2028
11,550 Overhead Type - 2 Year Cycle			
1	Courtdale 8000	0	422
2	Courtdale 8002	0	128
3	Courtdale 8003	0	86

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4	Dallas 1930	0	117
5	Dallas 1954	0	130
6	Dallas 350	0	74
7	Glenview 370	0	13
8	Glenview 372	0	217
9	Glenview 8004	0	451
10	Hanover 0070	102	0
11	Hanover 0075	12	0
12	Hanover 8005	30	0
13	Hunlock 419	178	0
14	Hunlock 420	1215	0
15	Hunlock 421	520	0
16	Huntsville 240	0	272
17	Huntsville 242	0	283
18	Huntsville 244	0	784
19	Huntsville 757	0	169
20	Huntsville 759	0	239
21	Kingston 315	0	134
22	Kingston 1215	0	71
23	Kingston 2530	0	159
24	Kingston 2550	0	76
25	Kingston 2555	0	26
26	Koonsville 7536	291	0
27	Koonsville 7540	1399	0
28	Koonsville 7576	301	0
29	Kunkle 500	0	299
30	Kunkle 510	0	357
31	Kunkle 520	0	486
32	Lincoln Street 602	63	0
33	Lincoln Street 603	94	0
34	Lincoln Street 604	214	0
35	Lincoln Street 606	55	0
37	Loomis 102	74	0
38	Loomis 103	125	0
40	Loomis 202	71	0

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41	Loomis 203	22	0
42	Plymouth 10	90	0
43	Plymouth 23	135	0
44	Plymouth 45	202	0
45	Plymouth 67	68	0
46	Plymouth 80	416	0
47	Swoyersville 116	0	165
48	Swoyersville 147	0	253
49	Swoyersville 216	0	84
50	Swoyersville 237	0	68
51	Swoyersville 247	0	155
52	Swoyersville 347	0	155
Total Transformers			

UGI Utilities, Inc.	Underground Transformer Inspection Plan Transformers	
	2027	2028
<i>5-Year Cycle</i>		
Total of 1,988 Padmount & Below Ground Transformers	392	383

Justification (per Section 57.198 (c))

UGI Electric’s Distribution Transformer Inspection Plan meets the requirements of 52 Pa. Code § 57.198 (n) (6).

# UGI Utilities, Inc. 2027 – 2028 Inspection and Maintenance Plan

**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

All single phase and three phase reclosers are inspected annually. A portion of the installations are inspected by an outside contractor as part of the overhead distribution line inspection program. The remaining installations are inspected by UGI personnel.

The purpose of performing the inspections is to ensure continued safe and reliable operation of the reclosers. The inspections are conducted by qualified company or contractor employees. The inspections check for physical damage, oil leaks, and any other conditions that could adversely affect the safe and reliable operation of the recloser.

Inspection information is documented and conditions that require follow-up are forwarded to the Engineering department for corrective action. Safety related issues are corrected immediately. Other reported problems are handled based on the severity of the situation.

Further details can be found in UGI Electric’s T&D Engineering Instruction Manual, Section 02-13.

## Recloser Inspection Plan

UGI Utilities, Inc. 134 Three Phase 201 Single Phase	Type	Recloser Inspection Plan	
		2027	2028
Reclosers inspected during Overhead Inspection Program	Three Phase 2 Year Cycle	67	73
	Single Phase 2 Year Cycle	96	110
Recloser/Control inspections by UGI Personnel	Three Phase 2 Year Cycle	73	67
	Single Phase 2 Year Cycle	110	96

## Justification (per Section 57.198 (c))

UGI’s Recloser Inspection Plan meets the requirements of 52 Pa Code Chapter 57 Section 57.198 (n) (7).

# UGI Utilities, Inc.

## 2027 – 2028 Inspection and Maintenance Plan

**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

UGI Electric inspects its Bulk Electric System (BES) substation every two weeks. The company inspects distribution substations monthly. The inspections are conducted by qualified Company representatives. The inspectors walk through each substation yard and control house documenting various equipment parameters and noting any physical damage, unsafe conditions, or potential problems with substation equipment, structures, and hardware. Substation fence integrity is verified along with the posting of “Danger” and “No Trespassing” signs. A description of the Company’s Substation Inspection Program can be found in UGI Electric’s T&D Engineering Instruction Manual, Section 4.2.

The purpose of substation inspections is to ensure continued safe and reliable operation of the substations.

Inspection information is documented. Conditions that require follow-up are forwarded to the Engineering department for corrective action. Safety related issues are corrected immediately. Other reported problems are handled based on the severity of the situation.

### Substation Inspection Plan

	Substation	Substation Inspection Plan	
		2027	2028
<b>UGI Utilities, Inc.</b> <i>Total Substations 14</i>	Mountain (BES) 230/66	26	26
	Courtdale 66/13	12	12
	Dallas 66/13	12	12
	Glenview 66/13	12	12
	Hanover 66/13	12	12
	Hunlock 66/13	12	12
	Huntsville 66/13	12	12
	Kingston 66/13	12	12
	Koonsville 66/13	12	12
	Kunkle 66/13	12	12
	Lincoln 66/13	12	12
	Loomis 66/13	12	12
	Plymouth/Lance 66/13	12	12
	Swoyersville 66/13	12	12

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Justification (per Section 57.198 (c))

UGI Electric's Substation Inspection Plan, which follows a monthly inspection cycle, conforms with industry standards and meets the requirements of 52 Pa. Code § 57.198 (n) (8).