



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

IN REPLY PLEASE
REFER TO OUR FILE

December 2, 2025

Docket No. P-2022-3034972

Utility Code 110500

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RE: PPL Electric Utilities Corporation Second Petition for Modification to its Existing Long-Term Infrastructure Improvement Plan at Docket No. P-2022-3034972

Dear Attorneys Klock and Ryan:

On September 25, 2025, PPL Electric Utilities Corporation (PPL Electric) filed a Second Petition for Modification to its Existing Long-Term Infrastructure Improvement Plan (Petition). To assist the Commission in conducting the review of PPL Electric's Petition, please respond with the information requested in Attachment 1.

Please forward the information requested to the Secretary of the Commission at the address listed below **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Please note your answers must be verified per 52 Pa. Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature _____
Title _____
Date _____

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of the response to Clinton McKinley, in the Reliability Section of the Bureau of Technical Utility Services via e-mail at cmckinley@pa.gov. Please also direct any questions to Clinton McKinley by e-mail or telephone at (717) 783-6161. Thank you in advance for your cooperation.

Sincerely,

Matthew L. Homsher
Secretary

Enclosure: Attachment 1

- cc: Dan Searfoorce, TUS
- John Van Zant, TUS
- Christian Yother, AUD
- Kathleen Aunkst, SEC
- Brent Killian, BIE

Attachment 1
TUS Data Request Set 1
PPL Electric Utilities Corporation Second Petition for Modification to its Existing Long-Term
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Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

- P-1. On November 24, 2025, the Office of Consumer Advocate (OCA) filed comments that, *inter alia*, requested that additional information be provided to ensure that PPL Electric's LTIIIP modifications comply with the requirements of Chapter 13 of the Public Utility Code and the Commission's *Final Implementation Order*. Please confirm that PPL Electric intends to reply to OCA's Comments in specificity.
- P-2. Please provide a table that summarizes PPL Electric's LTIIIP estimated actual and estimated spending, by year and program, for the years 2023 through 2025.
- P-3. Reference: Petition at 9. PPL Electric indicated that it would deploy smart grid devices and circuit upgrades targeting Worst Performing Circuits. Please identify the specific type and use of the smart grid devices referenced.
- P-4. Reference: Appendix A of the Petition (Modified LTIIIP) at 16. In the Poles - Distribution Pole Replacements section of the Modified LTIIIP, PPL Electric indicated that it inspects approximately 75,000 poles per year with an approximate rejection rate of 5%, with 80% of those being candidates for replacement, or approximately 3,000 poles ($(75,000 * .05) * (.8) = 3,000$). However, the table provided indicates that in 2025 PPL Electric plans to replace between 3,500 and 4,000 poles. Please explain why the replacement estimate for 2025 exceeds the estimated number of required replacements per historical data.
- P-5. Reference: Modified LTIIIP at 16. The table provided in the Poles - Distribution Pole Replacements section of the Modified LTIIIP indicates that PPL Electric intends to significantly increase the number of distribution pole replacements for the years 2025 - 2027. Please provide evidence that PPL Electric's estimated quantities are reasonable, considering workforce and supply constraints.
- P-6. Please identify the highest number of distribution pole replacements that PPL has ever completed in one calendar year.
- P-7. Reference: Modified LTIIIP at 18. In the table provided in the New Electric Reclosers section of the Modified LTIIIP, PPL Electric indicated that it would increase the installation of new electronic reclosers from 182 in 2023 and 72 in 2024 to 249-275 in 2025 and 231-255 in 2027. Please provide evidence that PPL Electric's estimated quantities are reasonable, considering workforce and supply constraints.

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- P-8. Reference: Modified LTIP at 23. In the Underground Cable Replacement section of the Modified LTIP, PPL Electric indicated that candidates are selected based on history of cable failures and failure risk scores generated by a data analytics model that uses criteria such as segment length, cable age, customer count, and number of tap fuse outages. PPL Electric also indicated that it plans to increase the number of segments of underground cable replaced from zero in 2023 and 66 in 2024 to 350-440 in 2025 and 200-300 in 2026 and 2027. Please provide evidence that PPL Electric's estimated quantities are reasonable and align with the failure risk scores referenced.
- P-9. Reference: Modified LTIP at 24. In the Low Tension Network (LTN) Primary Cable, Equipment and Structures section of the Modified LTIP, PPL Electric indicated that network transformer and network protector replacements are determined through inspection and age, where assets exceeding 40 years in service are considered the highest priority. Please quantify the number of LTN inspections planned for each year in 2025 through 2027 and confirm that PPL Electric's estimated quantities are reasonable, based on the number of planned inspections.
- P-10. Reference: Modified LTIP at 26. In the table provided in the Substation - Underground Getaway Cable Replacements and Life Extension section of the Modified LTIP, PPL Electric indicated that it plans to increase replacements from five in 2023 and three in 2024 to 15-20 in 2025, 24-29 in 2026, and 30-36 in 2027. Please provide evidence that PPL Electric's estimated quantities are reasonable, considering workforce and supply constraints.
- P-11. Reference: Modified LTIP at 26 - 27. In the table provided in the Substations – Miscellaneous Substation Equipment section of the Modified LTIP, PPL Electric indicated that it plans to increase replacements from two in 2023 and one in 2024 to 20-50 in 2025, and 18-20 in 2026 and 2027. Please provide the following:
- a. Identify the estimated quantities of the miscellaneous substation equipment listed on Page 26, to be replaced each year;
 - b. Evidence that PPL Electric's estimated quantities are reasonable, considering workforce and supply constraints; and
 - c. Describe the current availability and lead times of transformers.

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- P-12. Reference: Modified LTIP at 30. In the table provided in the Substations – Distribution Substation DC Equipment section of the Modified LTIP, PPL Electric indicated that it plans to increase replacements from three units in 2023 and two units in 2024 to 30-35 units in 2025, 2026, and 2027. Please provide the following:
- a. Identify the estimated quantities of 24 V, 48 V, and 125 V batteries, chargers, and related equipment to be replaced per year;
 - b. Describe the current availability and lead times of the required batteries and chargers; and
 - c. Evidence that PPL Electric’s estimated quantities are reasonable, considering workforce and supply constraints.
- P-13. Reference: Modified LTIP at 33. In the table provided in the LTN Upgrades section of the Modified LTIP, PPL Electric indicated that it plans to increase replacements from 29 units in 2023 and 37 units in 2024 to 164-185 units in 2025, 185-214 units in 2026, and 8-12 units 2027. Please provide responses to the following:
- a. Explain what constitutes a unit in this category (=e.g., an individual asset or project);
 - b. Explain why a larger number of replacements are budgeted for the years 2025 and 2026; and
 - c. Provide evidence that PPL Electric’s estimated quantities are reasonable, considering workforce and supply constraints.
- P-14. Reference: Modified LTIP at 36. In the table provided in the Reliability – System Reliability Improvement Projects of the Modified LTIP, PPL Electric indicated that it plans to increase improvements from five projects in 2023 and seven projects in 2024 to 17-22 projects in 2025, 310-370 projects in 2026, and 255-305 projects in 2027. Please provide the following:
- a. Identify the assets and estimated quantities of assets to be replaced or installed, by calendar year, as part of the System Reliability Improvement Projects program;
 - b. Describe how PPL Electric defines a “project”; and
 - c. Evidence that PPL Electric’s estimated quantities are reasonable, considering workforce and supply constraints.

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- P-15. Appendix A of the Modified LTIP consisted of a table that identified key distribution assets and the average asset age of each category of assets. Please provide a live electronic table that includes the following, for each of the asset categories identified in Appendix A.
- a. The average service life of each asset;
 - b. The percentage of assets exceeding design life; and
 - c. A description of historical failure rates.