
Devin Ryan

dryan@postschell.com
717-612-6052 Direct
717-731-1985 Direct Fax
File #: 140056

December 16, 2025

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for Approval of a Major Modification
to its Existing Long-Term Infrastructure Improvement Plan
Docket No. P-2022-3034972**

Dear Secretary Homsher:

Enclosed for filing are PPL Electric Utilities Corporation's ("PPL Electric" or the "Company") Answers to the Bureau of Technical Utility Services' ("TUS") Data Request Set 1 in the above-captioned proceeding.

Copies are being served as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/dmc
Enclosures

cc: Certificate of Service
Clinton McKinley (via Email cmckinley@pa.gov)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the filing is being served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL

Jacob Guthrie Esquire
Harrison W. Breitman, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
E-mail: jguthrie@paoca.org
E-mail: hbreitman@paoca.org

Date: December 16, 2025



Devin T. Ryan

**PPL Electric Utilities Corporation
 Response to the Set I Data Requests of the
 Bureau of Technical Utility Services (TUS)
 Dated December 2, 2025
Docket No. P-2022-3034972**

P-2 Please provide a table that summarizes PPL Electric’s LTIP estimated actual and estimated spending, by year and program, for the years 2023 through 2025.

PPL Electric Response See table below. Actuals provided are through November 30th, 2025.

LTIP Category	2023	2024	2025
Poles	11.4	12.58	43.34
New Electronic Reclosers	2.1	3.62	10.50
Distribution Animal Guarding	0.2	0.63	0.14
Failed Equipment	42.85	55.59	58.26
Underground Cable Replacement and Life Extension	0.52	0.39	4.02
Low Tension Network Primary Cable, Equipment and Structures	0.54	1.58	1.91
LTN Upgrades	11.25	16.38	6.72
Reliability	6.87	4.9	22.29
Improve System Reliability Projects	9.19	15.62	15.08
Unreimbursed Highway Relocations	19.23	21.11	4.28
Substation	8.87	10.12	22.27
Protection and Control	3.34	7.58	22.22
Total	\$116.36	\$150.1	\$211.29

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated December 2, 2025
Docket No. P-2022-3034972**

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.

PPL Electric
Response

The Company currently utilizes two different smart grid devices, the Viper ST3 and Viper SP, both manufactured by G&W Electric. The Viper ST3 is a 3-phase recloser, while the Viper SP is a 1-phase recloser. The Viper ST3 will identify faults on the system, isolate those faults, and automatically restore customers without human interaction. The Viper SP can detect faults and can be operated remotely, so an operator can isolate faults and restore customers quickly.

PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated December 2, 2025
Docket No. P-2022-3034972

P-4

Reference: Appendix A of the Petition (Modified LTIP) at 16. In the Poles - Distribution Pole Replacements section of the Modified LTIP, 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.

PPL Electric
Response

The replacement estimates for 2025 included pole replacements that were not completed in 2024 and were carried into the 2025 plan. There were approximately 1,800 poles that were carried over for replacement from 2024 to 2025.

PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated December 2, 2025
Docket No. P-2022-3034972

P-5

Reference: Modified LTIP at 16. The table provided in the Poles - Distribution Pole Replacements section of the Modified LTIP 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.

PPL Electric
Response

See response to P-4. In addition, PPL Electric develops demand planning projections that forecast future material requirements. The Company establishes orders and agreements with vendors for long-lead materials to meet business plan projections. In addition, PPL Electric's field construction workforce has increased by approximately 60% from 2022 to 2025 to support the increase in project work.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated December 2, 2025
Docket No. P-2022-3034972**

P-6

Please identify the highest number of distribution pole replacements that PPL has ever completed in one calendar year.

PPL Electric
Response

The highest number of distribution poles replaced in one calendar year is in 2025. Through November 30th, 2025, PPL Electric has replaced 4,079 poles, with approximately 100 more poles to be replaced by the end of the year.

PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated December 2, 2025
Docket No. P-2022-3034972

P-7

Reference: Modified LTIIP at 18. In the table provided in the New Electric Reclosers section of the Modified LTIIP, 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.

PPL Electric
Response

PPL Electric develops demand planning projections that forecast future material requirements. The Company establishes orders and agreements with vendors for long-lead materials to meet business plan projections. For example, the Company currently has a 5-year agreement with the vendor that supplies smart grid devices. In addition, PPL Electric's field construction workforce has increased by approximately 60% from 2022 to 2025 to support the increase in project work.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated December 2, 2025
Docket No. P-2022-3034972**

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.

PPL Electric
Response

The projected quantities of cable replacements are based on the history of cable failures and the failure risk model. However, the scope for the 2025 and 2026 projects prioritized those underground segments that have experienced recent failures, and those make up a majority of the 2025 and 2026 plans. Several segments have been included in the 2025 and 2026 plans that have high failure risk scores. PPL Electric projects that a greater number of cable replacements in 2027 will be based on segments with high failure risk scores.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated December 2, 2025
Docket No. P-2022-3034972**

P-9

Reference: Modified LTIIIP at 24. In the Low Tension Network (LTN) Primary Cable, Equipment and Structures section of the Modified LTIIIP, 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.

PPL Electric
Response

There are no inspections planned between 2025 and 2027 due to the volume of planned repairs and replacements that are not inspection driven in those years. The increase in number of projects for 2026 is primarily driven by projects to install aluminum ladders in PPL vaults. Inspections and regular maintenance cycles will resume once planned upgrades to manholes and the LTN are completed.

PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated December 2, 2025
Docket No. P-2022-3034972

P-10

Reference: Modified LTIIP at 26. In the table provided in the Substation - Underground Getaway Cable Replacements and Life Extension section of the Modified LTIIP, 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.

PPL Electric
Response

PPL Electric develops demand planning projections that forecast future material requirements. The Company establishes orders and agreements with vendors for long-lead materials to meet business plan projections. In addition, PPL Electric's field construction workforce has increased by approximately 60% from 2022 to 2025 to support the increase in project work.

**PPL Electric Utilities Corporation
 Response to the Set I Data Requests of the
 Bureau of Technical Utility Services (TUS)
 Dated December 2, 2025
Docket No. P-2022-3034972**

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.

PPL Electric
Response

- a. See table below for estimated quantities by equipment type:

<i>Miscellaneous Substation Equipment</i>	
Year	Misc. Equipment Replacements & Quantities
2023	12 kV Brown Glass Insulator Replacement - (Qty 1); Replace Control House - (Qty 1)
2024	69 kV high side Air Break Switch Replacement - (Qty 1)
2025	HVAC Upgrades - (Qty 64)
2026	HVAC Upgrades - (<i>Projected</i> qty 18-20)
2027	HVAC Upgrades - (<i>Projected</i> qty 18-20)

- b. PPL Electric develops demand planning projections that forecast future material requirements. The Company establishes orders and agreements with vendors for long-lead materials to meet business plan projections. PPL Electric utilizes internal crews to complete this work. Of

note, contractor crews may be used to supplement Company crews as required.

- c. The transformers that are part of the “Substations – Miscellaneous Substation Equipment” section of the Modified LTIIP are potential transformers (“PTs”) and capacitance-coupled voltage transformers (“CCVTs”). The Company does not keep a dedicated spare inventory of PTs and CCVTs, however they are high volume assets that are used in many ongoing substation upgrade projects, so there are always sufficient quantities on-hand if needed for emergency situations. Current stocking levels ensure we have 6-12 units on hand at any given time for each type of transformer. PTs currently have a lead time of up to 40 weeks while CCVTs have a lead time of up to 60 weeks.

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated December 2, 2025
Docket No. P-2022-3034972**

P-12

Reference: Modified LTIIP at 30. In the table provided in the Substations – Distribution Substation DC Equipment section of the Modified LTIIP, 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.

PPL Electric
Response

- a. See below for estimated quantities to be replaced per year:

Equipment	2025	2026	2027
24V Batteries	0	1	1
24V Chargers	0	0	3
48V Batteries	16	15	12
48V Chargers	12	12	14
125V Batteries	1	0	0
125V Chargers	1	2	2

- b. Batteries and chargers currently have a lead time of 4-20 weeks, which varies by manufacturer. Batteries and chargers are ordered as needed for projects.

WITNESS: Steven Selkregg

- c. PPL Electric develops demand planning projections that forecast future material requirements. The Company establishes orders and agreements with vendors for long-lead materials to meet business plan projections. PPL Electric utilizes internal crews to complete this work. Of note, contractor crews may be used to supplement Company crews as necessary to meet the estimated projects in the Modified LTIP.

PPL Electric Utilities Corporation
Response to the Set I Data Requests of the
Bureau of Technical Utility Services (TUS)
Dated December 2, 2025
Docket No. P-2022-3034972

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.

PPL Electric
Response

- a. A unit constitutes an upgrade project on a singular vault or manhole. Some of these upgrades may include the installation of telemetric devices, sump pumps, and/or the replacement of network protectors and transformers with updated monitoring and automation equipment.
- b. The comparatively large number of replacements for 2025 and 2026 is due to the implementation of two primary assets: sump pumps and secondary monitoring devices. Both of these devices were being evaluated in prior years and are now being implemented into PPL Electric's system.
- c. PPL Electric believes these quantities are very reasonable since a large number of these installations are secondary monitoring devices that are already designed and require relatively short and simple

WITNESS: Steven Selkregg

installations. Additionally, there are no supply chain concerns with these devices.

**PPL Electric Utilities Corporation
 Response to the Set I Data Requests of the
 Bureau of Technical Utility Services (TUS)
 Dated December 2, 2025
Docket No. P-2022-3034972**

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.

PPL Electric
 Response

- a. See table below for assets and quantities to be replaced or installed:

System Reliability Improvement Asset Breakdown			
Asset	2025 Forecast	2026 Planned	2027 Planned
Poles	8,000-9,700	19,500-24,500	20,900-26,000
3PH Smart Devices	50-60	160-205	170-220
1PH Smart Devices	30-40	55-75	60-80
3PH OH Conductor (Mi)	80-110	290-360	310-390
1PH OH Conductor (Mi)	140-175	270-340	290-365

- b. PPL Electric defines a “project” as a cohesive scope of work performed at a specific location under a single billable accounting code or job number. Examples of reliability projects include reconductoring a mile of line, re-feeding an inaccessible section along the roadside, or installing sectionalizing devices on a tap. Several “projects” may be grouped together under a “super project” to target a specific circuit or area.

- c. PPL Electric develops demand planning projections that forecast future material requirements. The Company establishes orders and agreements with vendors for long-lead materials to meet business plan projections. In addition, PPL Electric’s field construction workforce has increased by approximately 60% from 2022 to 2025 to support the increase in project work.

**PPL Electric Utilities Corporation
 Response to the Set I Data Requests of the
 Bureau of Technical Utility Services (TUS)
 Dated December 2, 2025
Docket No. P-2022-3034972**

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.

PPL Electric Response See table below. Historical failure rates shown are the average number of failures per calendar year.

Utility Account	Description	Average Service Life	% of Assets Exceeding Design Life	Description of Historical Failure Rates
362.0 – Station Equipment	DC System Equipment	53	0%	2
362.0 – Station Equipment	Substation Animal Guards	53	0%	3
362.0 – Station Equipment	Power Circuit Breakers	53	7%	1
362.0 – Station Equipment	Power Transformers	53	9.6%	1
362.0 – Station Equipment	Protection and Control Equipment	53	6%	While the Company does not track the failure rates of this class, this asset category has a historically low failure rate
364.3 – Poles and Fixtures	Distribution Wood Poles	55	30%	1,200
365.0 – Overhead Conductors, Device	Distribution Animal Guards	55	0%	The Company does not track failure rates for this asset.

365.0 – Overhead Conductors, Device	OH Primary Conductor	55	6%	760
365.0 – Overhead Conductors, Device	Air Break Switches	55	0%	45
365.0 – Overhead Conductors, Device	Automatic Switches (Primarily OCRs/VCRs)	55	0%	205
365.0 – Overhead Conductors, Device	Disconnect Switches	55	0%	28
367 – Underground Conductors	UG Primary Conductor (includes Getaways and Cross Yard Ties)	56	0%	250
366 – Underground Conduit	Foundation, Man Holes Transformer Vaults (excl Conduit)	70	0%	11
368.4 – Submersible or Padmt Type	UG Transformers (include LTN Transformers and Network Protectors)	48	1%	290

VERIFICATION

I, STEVEN D. SELKREGG, being the Director of Asset Management at PPL Services Corporation, 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 PPL Electric Utilities Corporation 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.

Date: 12/16/2025


Steven Selkregg (Dec 16, 2025 11:49:48 EST)
Steven D. Selkregg

Selkregg verification - LTIP TUS Set I

Final Audit Report

2025-12-16

Created:	2025-12-16
By:	Michelle Bartolomei (MLBartolomei@pplweb.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAASk5TsONKtiUsovoH-bNiaXFjRj5ubzTq

"Selkregg verification - LTIP TUS Set I" History

-  Document created by Michelle Bartolomei (MLBartolomei@pplweb.com)
2025-12-16 - 2:43:56 PM GMT- IP address: 136.226.61.28
-  Document emailed to Steven Selkregg (SDSelkregg@pplweb.com) for signature
2025-12-16 - 2:44:23 PM GMT
-  Email viewed by Steven Selkregg (SDSelkregg@pplweb.com)
2025-12-16 - 4:49:02 PM GMT- IP address: 104.47.74.126
-  Document e-signed by Steven Selkregg (SDSelkregg@pplweb.com)
Signature Date: 2025-12-16 - 4:49:48 PM GMT - Time Source: server- IP address: 136.226.61.28
-  Agreement completed.
2025-12-16 - 4:49:48 PM GMT

