



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

IN REPLY PLEASE
REFER TO OUR FILE

December 18, 2025

Docket No. M-2009-2094773
Utility Code: 111100

VINCENT DEGIUSTO
SENIOR DIRECTOR – ELECTRIC DIVISION
UGI UTILITIES, INC.
1 UGI DRIVE
DENVER, PA 17517
vdegiusto@ugi.com

Re: UGI Utilities, Inc. – Electric Division’s Biennial Inspection, Maintenance, Repair and Replacement Inspection and Maintenance Plan for the Period of January 1, 2027, through December 31, 2028, at Docket No. M-2009-2094773

Dear Mr. Degiusto:

On October 1, 2025, UGI Utilities, Inc. – Electric Division (UGI-ED) filed with the Pennsylvania Public Utility Commission (Commission) its Biennial Inspection, Maintenance, Repair, and Replacement Plan for January 1, 2027, through December 1, 2028, (2027-2028 I&M Plan) pursuant to 52 Pa. Code § 57.198(a). On November 17, 2025, via Secretarial Letter, The Bureau of Technical Utility Services (TUS) Staff sent UGI-ED a Data Request seeking additional information on the 2027-2028 I&M Plan. On December 1, 2025, UGI-ED responded.

The Commission’s regulations require electric distribution companies (EDCs) to prepare and file every two years, by October 1, a biennial plan for periodic inspection, maintenance, repair, and replacement of facilities 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, at Docket No. M-2009-2094773 assigned UGI-ED to Compliance Group 1 to initially file their plan by October 1, 2019, and then every two years thereafter. The plan must cover the two calendar years beginning 15 months after filing and remain in effect for two calendar years thereafter. TUS Staff, in accordance with 52 Pa. Code § 57.198(h), has delegated authority to accept or reject I&M Plans.¹

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.

¹ The Bureau of Conservation, Economics and Energy Planning was eliminated, and its functions and staff transferred to the Bureau of Technical Utility Services. *See Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Final Procedural Order, entered August 11, 2011, at Docket No. M-2008-2071852, at 4.

TUS Staff finds that UGI-ED's 2027 – 2028 I&M Plan generally complies with Section 57.198(b).

Time Frames

52. Pa. Code § 57.198(c) Time frames. The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will still support the level of reliability required by law.

UGI-ED's proposed program cycles fall within the proscribed time frames of the applicable Public Utility Code and thus, TUS Staff finds that UGI-ED's 2027 – 2028 I&M Plan generally complies with Section 57.198(c).

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.*

TUS Staff finds that UGI-ED's 2027 – 2028 I&M Plan generally complies with Section 57.198(m).

Vegetation Management

52. Pa. Code § 57.198(n)(1) Vegetation management. The Statewide minimum inspection and treatment cycle for vegetation management is between 4-8 years for distribution facilities. An EDC shall submit a condition-based plan for vegetation management for its distribution system facilities explaining its treatment cycle.

UGI-ED stated that it performs a vegetation management inspection on approximately half of its 1,113 miles of overhead distribution circuits each year. An inspection schedule by circuit was also provided. Based on the results of the inspection, UGI-ED indicated that it develops a condition-based vegetation management treatment plan each year. For the 2027 and 2028 plan years, UGI-ED estimated it will perform vegetation maintenance work on 150-200 miles of distribution overhead lines each year, including trimming/pruning, herbicide application, and the removal of dead or declining trees on and off – road rights-of-way. Actual treatment cycles for individual distribution facilities range from four to eight years.

TUS Staff finds that UGI-ED’s 2027 – 2028 I&M 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.*

UGI-ED stated that it will inspect all of its approximately 49,000 wood distribution poles on a 10 to 12-year cycle. The purpose of these inspections is to 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 associated attachments are free from damage and that no environmental conditions exist that may compromise the poles and associated attachments.

All poles will be inspected for decay, damage, and potential hazards associated with electrical equipment. Poles suspected of having internal decay will be inspected by the sound

and bore method. Poles manufactured greater than 20 years before the inspection date will be physically inspected below-ground level when accessible. The remaining strength of the pole will be calculated using data gathered from the inspection. If the remaining strength of the pole is found to be deficient, the pole will be classified as a reject pole, a re-enforceable reject pole, or a danger pole.

In the 2027-2028 I&M Plan UGI-ED requested a continued waiver from the pole loading calculation requirement under Section 57.198(n)(2)(vi). UGI-ED's construction standards 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. UGI-ED noted that 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. UGI-ED averred that 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.

UGI-ED's request for a continued waiver is granted. However, UGI-ED shall conduct subsequent assessments of pole strength prior to attachment of non-company facilities.

TUS Staff finds that UGI-ED's 2027 – 2028 I&M 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.

UGI-ED noted that pole inspections that result in a Section 57.198(n)(3) determination are brought to the attention of UGI-ED's program administrator and prioritized accordingly. UGI-ED 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-ED noted that it has seen an increase in pole reject rates in recent years, which has resulted in an accelerated pole replacement program under the UGI-ED Long-Term Infrastructure Improvement Plan.

TUS Staff finds that UGI-ED's 2027 – 2028 I&M 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.*

UGI-ED stated that it inspects its overhead distribution facilities by ground patrol every two years. The purpose of the inspection program is to verify that overhead facilities are in a safe, operational, and reliable condition. These inspections are performed by qualified UGI-ED 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.

TUS Staff finds that UGI-ED's 2027 – 2028 I&M 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.

UGI-ED stated that any deficiencies of the overhead distribution system discovered during the performance of its Distribution Overhead Line Inspections will be addressed based on the severity of the situation. UGI-ED indicated that items that may affect the integrity of circuits will be repaired or replaced within 30 days of discovery and safety issues would be addressed immediately.

TUS Staff finds that UGI-ED's 2027 – 2028 I&M 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.*

UGI-ED stated that it inspects all its overhead distribution transformers on a two-year cycle as part of the overhead distribution line inspection program and the all of its pad-mount and below-ground transformers over a five-year cycle. The purpose of these inspections is to verify that all transformers are safe, operational, and reliable condition. UGI-ED indicated that inspections are performed by qualified UGI-ED representatives or approved contractors. 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.

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

TUS Staff finds that UGI-ED's 2027 – 2028 I&M 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.

UGI-ED stated that all single-phase and three-phase reclosers are inspected annually. In supplemental information filed with the Commission, UGI-ED clarified that it plans to inspect 140 three-phase reclosers and 206 single-phase reclosers for a total of 346 units per year during the 2027-2028 cycle. UGI-ED noted that 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-ED personnel.

UGI-ED noted that the purpose of performing these inspections is to ensure continued safe and reliable operation of the reclosers. The inspections are conducted by qualified company or contractor employees. The inspection checks 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 UGI-ED Engineering department for corrective action. Safety related issues are corrected immediately. Other reported problems are handled based on the severity of the situation.

TUS Staff finds that UGI-ED's 2027 – 2028 I&M 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.

UGI-ED stated that it inspects bulk electric system substations every two weeks and its distribution substations monthly. UGI-ED reiterated that these inspections are conducted by qualified company representatives. The inspectors walk through each substation 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. The purpose of substation inspections is to ensure continued safe and reliable operation of the substations.

TUS Staff finds that UGI-ED’s 2027 – 2028 I&M Plan generally comply with Section 57.198(n)(8) of the Commission’s Regulations.

Conclusion

Upon review of UGI-ED’s 2027 – 2028 I&M Plan filed on October 1, 2025, and supplemental information filed with the Commission, it appears that the filing meets the requirements of 52 Pa. Code § 57.198 and is, therefore, accepted. Furthermore, as discussed *supra*, the previously approved exemption requested by UGI-ED for a continued waiver from the pole loading calculation requirement under Section 57.198(n)(2)(vi) may continue. This approval is contingent upon the possibility that subsequent audits, reviews, and inquiries, in any Commission proceeding, may be conducted pursuant to 52 Pa. Code § 57.197(a)

This plan must remain in effect for two calendar years, beginning January 1, 2027, through December 31, 2028. UGI-ED may request Commission approval of subsequent revisions to its approved 2027 – 2028 I&M Plan, in accordance with 52 Pa. Code § 57.198(l). Revisions must be submitted to the Commission as an addendum to UGI-ED’s quarterly reliability report filed pursuant to § 57.195, including prospective and past revisions to its 2027 – 2028 I&M 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 Clinton McKinley, Fixed Utility Valuation Engineer, TUS, at (717) 783-6161, or cmckinley@pa.gov.

Sincerely,



Matthew L. Homsher
Secretary

cc: Kriss Brown, LAW
Dan Searfoorce, TUS
John Van Zant, TUS
Brent Killian, BIE