



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: 1126015

ANGELINA UMSTEAD, ESQUIRE
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY
341 WHITE POND DRIVE
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Re: Biennial Inspection, Maintenance, Repair and Replacement Plan for FirstEnergy
Pennsylvania Electric Company for the period of January 1, 2027, through December 31,
2028, at Docket No. M-2009-2094773

Dear Attorney Umstead:

On October 1, 2025, FirstEnergy Pennsylvania Electric Company (FE PA) 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) for its four rate districts,¹ pursuant to 52 Pa. Code § 57.198(a). On November 18, 2025, via Secretarial Letter, the Bureau of Technical Utility Services (TUS) Staff sent FE PA a Data Request seeking additional information on the 2027-2028 I&M Plan. On December 3, 2025, FE PA 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 FE PA 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.²

¹ By Order entered on December 7, 2023, the Commission granted certain approvals and certificates of public convenience for the unification of the four electric distribution companies (Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company) into one company, FE PA. *See, Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company*, at Docket Nos. A-2023-3038771, et al.

² 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.

FE PA's 2027-2028 I&M Plan reflects the changes to its 2025 – 2026 I&M Plan directed by the Commission and the 2024 unification of FE PA's four predecessor companies into one company.

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.

TUS Staff finds that FE PA'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.

FE PA's proposed program cycles fall within the proscribed time frames of the applicable Public Utility Code and thus TUS Staff finds that FE PA'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 sub 52 Pa. Code § (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 FE PA'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.

FE PA indicated that it will continue a four-to-five-year vegetation management cycle, as established in its 2025 – 2026 I&M Plan. FE PA noted that it is exploring emerging technologies that may suggest effective vegetation management strategies for circuit and cycle work models through remote sensing and analytics, which could allow for future adjustments to the vegetation management plan by utilizing reliability metrics and circuit system condition to determine appropriate clearance cycle length. To improve its tree-related reliability, FE PA indicated that it continues to analyze circuit electrical protection schemes and gives added attention to select line sections, such as those that serve high numbers of customers.

A table depicting the FE PA's Inspections and Treatments Planned Circuit Miles by rate district and year was provided on Page10 of the 2027 – 2028 I&M Plan.

TUS Staff finds that FE PA's 2027 – 2028 I&M Plan generally complies with Section 57.198(n)(1).

Distribution 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.*

FE PA stated that its 12-year inspection cycle for wood poles in its 2027 – 2028 I&M Plan is based on accepted electric utility practices and allows enough time for proper planning and remediation prior to any problems negatively impacting personal safety, equipment integrity or service reliability.

A table depicting the total number of poles to be inspected in 2027 and 2028, by rate district, was provided on Page 14 of the 2027 – 2028 I&M Plan.

FE PA requested a continuation of a previously approved exemption from performing pole load calculations as part of pole inspections. Rather than conducting load calculations as part of each pole inspection, FE PA follows the practice of creating base line designs using FE PA's Distribution Line Construction Standards and Distribution Engineering Practices. Additionally, as FE PA receives requests from other entities to attach their facilities to FE PA's 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.

FE PA is granted exemption from performing load calculations as part of its pole inspection program. However, FE PA shall conduct subsequent assessments of pole strength prior to attachment of non-company facilities.

TUS Staff finds that FE PA's 2027 – 2028 I&M Plan is consistent with the previously approved I&M plan and 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.

FE PA indicated that pursuant to its 2027 – 2028 I&M Plan, wood poles and supporting structures with recorded defects that it 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.

TUS Staff finds that FE PA'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.*

FE PA indicated that pursuant to its 2027 – 2028 I&M Plan, its distribution overhead lines and equipment inspection cycles shall be performed on a two-year cycle and that the inspection will include a visual inspection and recording of abnormal conditions.

TUS Staff finds that FE PA’s 2027 - 2028 I&M Plan is consistent with and 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.

TUS Staff finds that FE PA’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.*

FE PA indicated that pursuant to its 2027 – 2028 I&M Plan, it will inspect overhead distribution transformers on a two-year cycle, to align with its distribution overhead line inspections. Below-ground transformers and above-ground pad-mount transformers will be inspected on a five-year cycle. A table depicting the number of distribution transformers to be inspected in 2027 and 2028 by rate district, was provided on Page 19 of FE PA’s 2027 - 2028 I&M Plan.

TUS Staff finds that FE PA’s 2027 - 2028 I&M Plan is consistent with and 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.

FE PA indicated that it visually inspects hydraulic distribution line reclosers annually and in supplemental information filed with the Commission, FE PA indicated that it would inspect all electronic distribution line reclosers on a two-year cycle as part of the Overhead Inspection Program. In addition, electronic distribution line reclosers are monitored via supervisory control and data acquisition communications for alarms that would indicate a condition that would need to be addressed. 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 National Electric Safety Code (NESC). Additionally, FE PA noted that one year between inspection cycles has proven to be successful in monitoring operations, which can support system planning.

TUS Staff finds that FE PA'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.

FE PA indicated that pursuant to its 2027 – 2028 I&M Plan, it 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. FE PA indicated that there are three types of preventative maintenance inspections that are performed at substations throughout the year, including: 1) Monthly Safety and Security of Facilities and Visual Equipment Inspection of Electrical Equipment and Reporting/Recording Identified Deficiencies and Relay Operations (Class C); 2) Quarterly Safety and Security, Visual Equipment Inspection and Record Readings (Class B); and 3) Annual Seasonal Maintenance - Summer and Winter Readiness (Class A).

TUS Staff finds that FE PA's 2027 – 2028 I&M Plan generally complies with Section 57.198(n)(8).

Conclusion

Upon review of FE PA's 2027 – 2028 I&M Plan filed October 1, 2025, and supplemental information filed with the Commission, it appears that the filing generally complies to the requirements of 52 Pa. Code § 57.198 and is accepted. Furthermore, as discussed *supra*, the exemption requested by FE PA is approved. 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. FE PA 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 FE PA'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,

A handwritten signature in cursive script that reads "Matthew L. Homsher".

Matthew Homsher
Secretary

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