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File #: 140056

December 30, 2025

VIA ELECTRONIC FILING

Rosemary Chiavetta, 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 Chiavetta:

On September 25, 2025, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) filed the above-captioned Petition for Approval of a Major Modification to its Existing Long-Term Infrastructure Improvement Plan (“Petition”) with the Pennsylvania Public Utility Commission (“Commission”). In the Petition, PPL Electric requested Commission approval of a “major” modification its Long-Term Infrastructure Improvement Plan (“LTIIIP”), namely the increased investments in the distribution system to protect against weather-related outages and improve the experience for customers, which exceeded by more than 20% the total capital expenditure projection set forth in the current LTIIIP.

On November 24, 2025, the Office of Consumer Advocate (“OCA”) filed Comments seeking “additional information” that the OCA believes is “necessary for the Commission to determine that the proposed modifications are prudent and cost-effective, represent an acceleration of improvements, and will maintain safe, reliable and reasonable service as required by 66 Pa. C.S. §§ 1352(a)(5), (a)(6) and 1353.” (OCA Comments, p. 4.)

Further, on December 2, 2025, the Commission served a Secretarial Letter containing Bureau of Technical Utility Services’ (“TUS”) Data Request Set 1, which requested certain information regarding the proposed major modification. On December 16, 2025, PPL Electric filed its Answers to TUS’s Data Request Set 1.

PPL Electric respectfully submits this letter in reply to the OCA's Comments and addresses the questions and requests set forth in the OCA's Comments as follows.¹

I. REPLY TO OCA'S COMMENTS

A. PROJECTED LTIP EXPENDITURES

In its Comments, the OCA presents a chart comparing the differences between the existing LTIP budgets and proposed LTIP budgets. Based on that chart, the OCA concludes that the "four primary drivers for the increased projections are System Reliability Improvement Projects, Substation, Failed Equipment, and Poles." (OCA Comments, p. 6.) OCA follows by asserting that "the Company has not adequately explained its proposed spending increases for many of these categories, as set forth more fully" in its Comments. (*Id.*) PPL Electric will address the OCA's requests for additional information in the following sections.

B. SYSTEM RELIABILITY IMPROVEMENT PROJECTS

In its Comments, the OCA requests that the Commission direct PPL Electric to track and report all categories and subcategories of System Reliability Improvement Projects and their forecasted budgets. (OCA Comments, p. 8.)

The OCA's request is unnecessary. The System Reliability Improvement Project category includes only one type of project, which is improvements to distribution circuits to harden those circuits against storms and improve reliability. 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. Therefore, as there is only one category of projects under System Reliability Improvement Project, PPL Electric already will be tracking and reporting on these projects as part of its AAOPs.

Next, the OCA requests the Commission to direct PPL Electric to include a description of the Worst Performing Circuit ("WPC") identification process in its LTIP. (OCA Comments, p. 8.)

PPL Electric can add the description of the WPC identification process to its LTIP. For reference, the WPC identification process is laid out in Appendix A of PPL Electric's Quarterly Reliability Report for Q3 2025 as follows:

Worst Performing Circuit Definition:

PPL Electric uses a weighted circuit SAIDI and circuit SAIFI contribution over the previous three years to define the worst performing circuits on its system. IEEE Major

¹ To the extent that the Company does not address a recommendation or issue in this letter, PPL Electric's failure to respond should not be construed as the Company's agreement therewith.

Event days, transmission outages, and scheduled outages are excluded. This ranking system was put in place as of the first quarter of 2025.

The OCA's final request regarding the System Reliability Improvement Projects is for the Commission to direct PPL Electric to include more specific information on its hardening standards and the interplay between investment in hardening and investment in Failed Equipment and Poles. (OCA Comments, p. 8.)

In response, the Company is performing most of the circuit hardening scope as part of the System Reliability Improvement Projects. However, the Company has incorporated storm hardening standards into the distribution design standards, which helps ensure that storm hardening standards are applied across all projects regardless of specific scope drivers. Storm hardening standards include installing stronger poles and covered conductors that can better withstand severe weather events or relocating circuits underground or away from trees. Hardening the system will help decrease the trend in failed poles and failed equipment, which should eventually reduce the investment required in Failed Equipment and Poles.

C. SUBSTATION

Regarding the Substation category, the OCA requests [that] the Commission require PPL Electric to provide a more detailed summary of its forecasted budget increase for Substation investment which indicates how and why additional ratepayer funds are required for substation investment. (OCA Comments, pp. 9-10.)

PPL Electric has prepared the following table, which provides additional details on the budget increases by category. As seen below, the increase in Substation investments is primarily driven by investments in proactive Power Transformer and Underground Getaway Cable replacements. These categories have a large population that is at or near the end of its expected useful life. Equipment failures in these categories generally lead to long duration outages for a large number of customers and increased system reliability risk while these assets are out of service. Replacing these assets after a failure and restoring the system to normal configuration may take 6 weeks or longer, leaving the system vulnerable to outages that may affect a large number of customers for a long duration.

Substation Category	2026 Planned	2027 Planned
Underground Getaway Cable Replacement and Life Extension	\$3,750,000	\$9,225,409
69/12 kV & 138/12 kV Transformer Replacement	\$23,000,000	\$34,185,393
Distribution Substation Circuit Breakers	\$14,700,000	\$14,762,751
12 kV Underground Bus Tie & Transfer Cable Replacement	\$540,003	\$468,615
Distribution Substation DC Equipment	\$400,000	\$-
Substation Animal Guarding	\$99,259	\$93,694
Miscellaneous Substation Equipment	\$71,049	\$64,139
Total	\$42,560,311	\$58,800,000

D. FAILED EQUIPMENT

For the Failed Equipment category, the OCA requests that the Commission direct PPL Electric to provide additional details regarding how it allocated its LTIIP budget to Failed Equipment based on historic trends, how anticipated future trends shape the proposed budget modification, and how the Failed Equipment budget is informed by sub-classifications of equipment for which PPL Electric has experienced failure. (OCA Comments, p. 10.)

To determine the Failed Equipment budget, the Company analyzed the historic trend of failures and average budget spent in Failed Equipment sub-classifications. Based on that analysis, PPL Electric determines whether modifications should be made to increase or decrease the budget. For example, the Company has experienced an increase in failures of Underground Getaway Cables and Reclosers in recent years. Getaway Cable failures are generally costly to replace and therefore will increase the future budget required in this category due to the anticipated increase in failures. Likewise, recent increases in the volume of Recloser failures will require additional budget to address these failures as they emerge. However, as the Company increases its proactive investment in these and other LTIIP categories, the future investment needed in the Failed Equipment category should reduce. Any minor modifications to the Failed Equipment budget would be addressed through the AAOP process.

E. POLES

With respect to the Poles category, the OCA requests the Commission to direct PPL Electric to provide additional information regarding current hardening standards. (OCA Comments, p. 11.)

See Section I.B, *supra*. Storm hardening standards include installing stronger poles that can better withstand severe weather events. Therefore, it is more favorable to replace an already degraded wood pole with a new higher-class pole when practical to do so. As stated on page 17 of the LTIIP, the threshold for lower class poles to be deemed non-restorable has been lowered, ensuring that the Company can replace more poles that are at risk of failure and harden the system

against storms, which will improve service reliability for customers. This strategy is reflected in the projected number of pole replacements on page 16 of the LTIP. Moreover, the Company notes that the replacement estimates for 2025 included approximately 1,800 pole replacements that were not completed in 2024 and were carried into work for 2025.

F. VEGETATION MANAGEMENT

The OCA also “questions whether PPL Electric’s proposed investments are being targeted to the correct areas” and requests that the Commission “direct PPL Electric to provide specific information regarding spending levels for enhanced, more frequent, or targeted vegetation management.” (OCA Comments, pp. 11-12.)

PPL Electric has proposed to increase its vegetation maintenance budget based on the current base rate case, which remains pending before the Commission. The expanded budget will support a higher frequency in the cycle of vegetation inspection and maintenance activities. The Company also has proposed to implement a program to acquire enhanced distribution Right of Way (“ROW”) rights that will allow the Company to remove hazard and danger trees that are currently outside of the Company’s ROW. The enhanced rights proposal includes a targeted approach that addresses the highest risk areas for customer interruptions based on tree risk conditions and outage impact. The Company will also identify and prioritize this enhanced vegetation reliability work by utilizing a combination of remote sensing and risk modeling techniques to map vegetation presence and model tree conditions/risk system wide. Models are developed using data sources, such as satellite imagery, LiDAR, historical vegetation maintenance information, and outage data. This approach will also aid in the strategic acquisition of additional ROW with hazard and danger tree rights. For additional information on PPL Electric’s planned vegetation management expenditures and practices, please see Nicole Howell’s direct testimony (PPL Electric St. No. 17) submitted in PPL Electric’s 2025 Rate Case at Docket Nos. R-2025-3057164, et al.

G. AGING PLANT IN SERVICE

The OCA asserts that without information showing the proportion of assets in each class that are at end-of-life, how PPL Electric evaluates asset condition beyond age, or how asset age directly informs project selection, the OCA cannot assess whether asset age meaningfully contributes to the proposed \$627.63 million increase in System Reliability Improvement Projects or the \$26.12 million increase in Failed Equipment. (OCA Comments, p. 12.) The OCA then requests that the Commission direct PPL Electric to provide this information, including age distributions, design life assumptions, and failure-rate trends by asset class, in order to support its age-related justification for the proposed budget modifications. (*Id.*)

1. PPL Electric’s Identification of the Average Age of Major Units of Property

The OCA’s requests for information in this section of its Comments are addressed as follows:

- a. For each asset class listed on page 40 of Appendix A to the Petition, what proportion of assets is at or beyond their manufacturer-rated design life?

Response: Manufacturer-rated design life of assets is generally not provided by manufacturers. However, the Company does record the average service life of assets by utility account. The average service life and percentage of assets exceeding average service life by asset category are provided below:

Utility Account	Description	Average Service Life	% of Assets Exceeding Average Service Life
362.0 – Station Equipment	DC System Equipment	53	0%
362.0 – Station Equipment	Substation Animal Guards	53	0%
362.0 – Station Equipment	Power Circuit Breakers	53	7%
362.0 – Station Equipment	Power Transformers	53	9.60%
362.0 – Station Equipment	Protection and Control Equipment	53	6%
364.4 – Poles and Fixtures	Distribution Wood Poles	55	30%
365.0 – Overhead Conductors, Device	Distribution Animal Guards	55	0%
365.0 – Overhead Conductors, Device	OH Primary Conductor	55	6%
365.0 – Overhead Conductors, Device	Air Break Switches	55	0%
365.0 – Overhead Conductors, Device	Automatic Switches (Primarily OCRs/VCRs)	55	0%
365.0 – Overhead Conductors, Device	Disconnect Switches	55	0%
367 – Underground Conductors	UG Primary Conductor (includes Getaways and Cross Yard Ties)	56	0%
366 – Underground Conduit	Foundation, Man Holes Transformer Vaults (excl Conduit)	70	0%
368.4 – Submersible or Padmt Type	UG Transformers (include LTN Transformers and Network Protectors)	48	1%

- b. For each asset class, what is the design life being used?

Response: Refer to the response to part (a), *supra*.

- c. Provide age distribution (not averages) for each asset class—e.g., % of assets aged 0–10, 10–20, 20–30, 30–40, 40+ years.

Response: See below for age distribution:

Utility Account	Retirement Unit	Age Bracket						Grand Total
		0-10 yrs	11-20 yrs	21-30 yrs	31-40 yrs	41-50 yrs	51 + yrs	
362.0 - Station Equipment	Power Transformers	22%	44%	9%	11%	8%	7%	100%
362.0 - Station Equipment	Power Circuit Breakers	17%	55%	7%	7%	6%	8%	100%
362.0 - Station Equipment	Protection and Control Equipment	3%	13%	35%	31%	10%	8%	100%
362.0 - Station Equipment	Substation Animal Guards	25%	75%	0%	0%	0%	0%	100%
362.0 - Station Equipment	DC System Equipment	16%	65%	13%	3%	2%	1%	100%
362.0 - Station Equipment Total		18%	44%	12%	12%	7%	7%	100%
364.4 - Poles and Fixtures	Distribution Wood Poles	26%	31%	16%	13%	8%	6%	100%
365.0 - Overhead Conductors, Device	OH Primary Conductor	20%	22%	18%	22%	10%	9%	100%
365.0 - Overhead Conductors, Device	Automatic Switches (Primarily OCRs/VCRs)	96%	4%	0%	0%	0%	0%	100%
365.0 - Overhead Conductors, Device	Air Break Switches	9%	78%	11%	3%	0%	0%	100%
365.0 - Overhead Conductors, Device	Distribution Animal Guards	48%	52%	0%	0%	0%	0%	100%
365.0 - Overhead Conductors, Device	Disconnect Switches	82%	3%	0%	1%	3%	11%	100%
365.0 - Overhead Conductors, Device Total		36%	22%	13%	16%	7%	6%	100%
366.0 - Underground Conduit	Foundation, Man Holes Transformer Vaults	35%	21%	12%	17%	7%	8%	100%
367.0 - Underground Conductors, Device	UG Primary Conductor (includes Getaways and Cross Yard Ties)	22%	37%	20%	16%	4%	1%	100%
368.4 - Submersible or Padmt Type	UG Transformers (include LTN Transformers and Network Protectors)	21%	31%	16%	25%	7%	0%	100%
Grand Total		27%	30%	15%	15%	7%	5%	100%

d. Provide historical failure rates for each asset class by age cohort.

Response: PPL Electric does not track failure rates by age cohort. See below table for annual failure rates by asset class:

Utility Account	Description	Description of Annual Historical Failure Rates
362.0 – Station Equipment	DC System Equipment	2
362.0 – Station Equipment	Substation Animal Guards	3
362.0 – Station Equipment	Power Circuit Breakers	1
362.0 – Station Equipment	Power Transformers	1
362.0 – Station Equipment	Protection and Control Equipment	While PPL does not track the failure rates of this class, this asset category has a historically low failure rate.
364.4 – Poles and Fixtures	Distribution Wood Poles	1,200
365.0 – Overhead Conductors, Device	Distribution Animal Guards	PPL does not track failure rates for this asset.
365.0 – Overhead Conductors, Device	OH Primary Conductor	760
365.0 – Overhead Conductors, Device	Air Break Switches	45
365.0 – Overhead Conductors, Device	Automatic Switches (Primarily OCRs/VCRs)	205
365.0 – Overhead Conductors, Device	Disconnect Switches	28
367 – Underground Conductors	UG Primary Conductor (includes Getaways and Cross Yard Ties)	250
366 – Underground Conduit	Foundation, Man Holes Transformer Vaults (excl Conduit)	11
368.4 – Submersible or Padmt Type	UG Transformers (include LTN Transformers and Network Protectors)	290

- e. Provide the failure-vs-age curve used to justify the System Reliability Improvement Projects increase.

Response: As stated on page 36 of the LTIIP, the System Reliability Improvement Projects are initiated to address reliability concerns and harden the system to withstand severe weather events. This category of projects is not driven by age of assets or end-of-life failures. Therefore, there is no failure-vs-age curve for the System Reliability Improvement Projects.

- f. Explain how Figure 3 (Petition, App’x A at 4) correlates to specific asset classes on page 40 of Appendix A to the Petition.

Response: See below for a table of non-storm equipment failures by asset component:

Component Desc	Non Storm Equipment Failure Cases					
	2020	2021	2022	2023	2024	2025
No Component Entered	4		1		1	7
OH-Capacitor Bank	2	1	4	2		2
OH-Lightning Arrester	50	51	63	60	39	38
OH-Other Equipment(explain)	91	71	76	73	61	96
OH-Pole/Arms Attachments	235	249	335	243	259	269
OH-PRI Splices and Connectors	39	45	41	54	45	43
OH-Primary/Neutral	432	452	466	411	487	463
OH-SEC Splices and Connectors	198	170	199	136	201	187
OH-Secondaries/Services	394	364	461	363	437	480
OH-Switch/Automatic	30	37	54	26	40	38
OH-Switch/Manual/AB/Disc/OS/LBD	26	27	20	25	20	33
OH-Tap Fuse/Cutout	217	196	236	208	260	219
OH-Transformer	747	667	723	598	703	617
OH-Transformer Fuse/Cutout	1,145	1,043	1,161	961	943	907
OH-Transmission	2	8		6	15	
SUB-Circuit Breaker	21	9	1	2	4	3
SUB-Control/Relay		2	1			1
SUB-Insulator		3	13		2	1
SUB-Lightning Arrester			1			
SUB-Other Equipment(Explain)	2	4	1	1		5
SUB-Power Fuse	2	1	1			
SUB-Power Wiring						1
SUB-Structure				4		
SUB-Switch/Automatic					1	
SUB-Switch/Manual/AB/Disc/LBD	21	1			1	1
SUB-Transformer	7			2	2	
UG-Elbows	4	12	9	6	3	7
UG-Lightning Arrester	7	7	13	10	7	4
UG-Load Break Junctions	3	4	2	1		
UG-Low Tension Network	1		6			
UG-Other Equipment(explain)	6	6	15	13	17	15
UG-Pads/Vaults/MHs & Splice Boxes	6	9	12	7	13	17
UG-PRI Splices and Connectors	10	9	6	9	2	8
UG-Primary Cable/Neutral	369	312	357	297	305	272
UG-Riser Pole Equip & Devices	23	30	49	32	50	35
UG-SEC Splices and Connectors	2	4	7	1	2	7
UG-Secondaries/Services	65	81	127	63	103	149
UG-Switchgear	8	18	10	16	22	20
UG-Transformer/Transformer Fuse	78	77	104	91	75	97
Total	4,247	3,970	4,575	3,721	4,120	4,042

- g. Identify which System Reliability Improvement Projects subcategories are driven by age-related deterioration, and the budget for each.

Response: As stated in response to part (e), *supra*, and on page 36 of the LTIIP, the System Reliability Improvement Projects are initiated to address reliability concerns and harden the system to withstand severe weather events. This category of projects is not driven by age of assets or end-of-life failures.

- h. Explain how the listed average ages informed the System Reliability Improvement Projects project identification or prioritization.

Response: As stated in response to part (e), *supra*, and on page 36 of the LTIP, the System Reliability Improvement Projects are initiated to address reliability concerns and harden the system to withstand severe weather events. This category of projects is not driven by age of assets or end-of-life failures.

- i. Quantify how much of the System Reliability Improvement Projects program is tied to assets exceeding end-of-life thresholds.

Response: As stated in response to part (e), *supra*, and on page 36 of the LTIP, the System Reliability Improvement Projects are initiated to address reliability concerns and harden the system to withstand severe weather events. This category of projects is not driven by age of assets or end-of-life failures.

- j. Why do some assets with similar average ages receive major investment increases (e.g., poles), while others do not (e.g., switches, underground transformers)?

Response: There are many factors that must be considered when determining which assets require investment increases. Such factors may include the reliability impact of that asset, number of customers served by the asset, failure history, ability to maintain and extend the life of the asset, average service life, etc. Investments are not solely driven by asset age because age is just one factor to consider. For example, the System Reliability Improvement Projects are initiated to address reliability concerns and harden the system to withstand severe weather events. This category of projects is not driven by age of assets or end-of-life failures; however, there are substantial investments in this category.

- k. What risk assessment differentiates aging substation assets vs. aging overhead conductor assets?

Response: As stated in response to part (j), *supra*, there are many factors that must be considered when determining which assets require investment increases. This may include the reliability impact of that asset, number of customers served by the asset, failure history, ability to maintain and extend the life of the asset, average service life, etc. Substation assets and overhead conductor assets may differ in one or more of these drivers, and therefore the risk will vary.

- l. Provide industry benchmark average ages for each asset class (EEI, EPRI, or other).

Response: This information is not readily attainable or publicly available.

- m. Explain whether PPL Electric's average ages are above, below, or consistent with national medians.

Response: See response to part (l), *supra*. No comparison can be made because this information is not readily attainable or publicly available.

- n. Does PPL Electric conduct condition-based assessments (CBA) or asset- health indexing for these asset classes? If so, provide condition-based scoring for each asset class identified on page 40 of Appendix A to the Petition. If not, explain why age alone is considered adequate for investment justification.

Response: Condition-based assessments or asset-health indexing are not available for these categories. As stated in response to part (j), *supra*, investments are not solely driven by asset age because age is just one factor to consider. For example, the System Reliability Improvement Projects are initiated to address reliability concerns and harden the system to withstand severe weather events. This category of projects is not driven by age of assets or end-of-life failures; however, there are substantial investments in this category.

- o. Provide the percentage of outages, by asset class, attributable to: age-related equipment failure, vegetation, or other causes.

Response: See the table provided in response to part (f), *supra*.

- p. Provide a breakdown of non-storm failures by asset type to support the claim that asset age is driving failure trends.

Response: See the table provided in response to part (f), *supra*.

2. PPL Electric's Determination Regarding Asset Contribution Reliability Metrics

The OCA's requests for information in this section of its Comments are addressed as follows:

- a. Provide the underlying trend analysis supporting the statement that "no-light equipment failures are trending upward," including year-over-year CI and CMI for each asset class, normalized for weather.

Response: See Attachment 1, which shows an upward trend in weather normalized Cases, CI, and CMI from 2023-2025.

- b. Explain why the data presented on page 41 of Appendix A shows decreases for some assets, but PPL Electric cites only an aggregate upward trend.

Response: Although some asset categories have decreased in recent years, those categories are significant drivers of the substantial increase in CI and CMI shown in the table on page 41 of Appendix A and in Attachment 1. For example, as seen in the table provided in part (c) of this section, *infra*, the largest decrease in CMI was seen in the SUB-Circuit Breaker category, with a net decrease over the 2020-2024 period of (347,448). However, that decrease pales in comparison to the significant increases in CMI seen in categories like OH-Pole/Arms Attachments and OH-Primary/Neutral, which saw increases over that same

period of 947,685 and 915,800, respectively. Furthermore, for purposes of evaluating the reliability of the Company’s electric service, PPL Electric must focus on driving the aggregate trend downward, which necessarily involves targeted redressing of individual categories.

- c. Identify which specific asset classes (e.g., pole attachments, overhead conductor, underground primary, switches) contributed to the greatest marginal increase in CI/CMI from 2020–2024.

Response: PPL Electric interprets “asset classes” as asking for information about equipment components. With that understanding, PPL Electric responds as follows.

For both CI and CMI, Overhead Poles/Arms Attachments showed the steepest rate of equipment failure related growth. See the table below:

Component Desc	CI						CMI					
	2020	2021	2022	2023	2024	Slope	2020	2021	2022	2023	2024	Slope
No Component Entered	2,290	26	1		223	(403)	31,263	2,004	282		39,486	3,737
OH-Capacitor Bank	490	1,020	2,593	1,135		351	12,697	50,662	58,670	49,329		11,790
OH-Lightning Arrester	2,702	2,151	3,979	4,685	1,215	(44)	290,321	293,442	326,471	373,443	242,699	(1,524)
OH-Other Equipment(explain)	6,109	3,456	10,372	1,755	3,062	(780)	451,306	313,318	824,157	269,398	277,129	(39,227)
OH-Pole/Arms Attachments	35,347	43,737	54,881	42,747	52,584	3,348	3,959,531	5,505,965	6,093,564	5,104,021	8,898,926	947,685
OH-PRI Splices and Connectors	15,161	15,620	10,366	13,340	16,463	28	960,526	1,443,678	1,359,976	1,601,111	2,135,092	246,657
OH-Primary/Neutral	116,882	103,465	88,710	78,887	113,600	(3,114)	14,222,141	13,187,676	11,325,422	12,524,653	19,132,653	915,800
OH-SEC Splices and Connectors	1,710	1,690	2,621	1,913	1,889	58	151,429	206,053	257,425	236,688	214,358	15,449
OH-Secondaries/Services	3,283	3,369	4,208	3,097	4,314	179	370,513	379,299	598,674	301,811	613,787	40,906
OH-Switch/Automatic	15,214	25,270	32,441	24,882	27,593	2,437	1,330,628	2,014,136	2,419,922	2,624,766	3,486,750	492,267
OH-Switch/Manual/AB/Disc/OS/LBD	6,291	5,692	6,712	8,840	7,010	259	401,764	297,479	543,795	513,781	2,324,929	406,263
OH-Tap Fuse/Cutout	7,764	7,116	8,950	7,523	8,876	263	841,505	925,719	984,354	1,003,536	2,037,594	246,999
OH-Transformer	7,292	8,189	6,862	5,429	5,233	(688)	1,225,848	1,171,421	1,260,106	732,841	1,235,849	(41,858)
OH-Transformer Fuse/Cutout	20,863	18,545	18,616	16,754	15,688	(1,214)	2,208,699	2,025,416	2,071,875	1,944,057	2,120,017	(25,872)
OH-Transmission	12,810	9,790		6,474	24,628	2,032	155,446	95,673		120,082	520,220	75,396
SUB-Circuit Breaker	28,289	9,349	1,072	2,685	4,149	(5,494)	1,766,321	202,774	10,542	104,720	78,109	(347,446)
SUB-Control/Relay		730	622			(108)		9,127	26,665			17,538
SUB-Insulator		3,539	14,572	1,892	3,334	(1,330)		31,055	233,049	105,952	25,387	(14,410)
SUB-Lightning Arrester			986						83,455			
SUB-Other Equipment(Explain)	35,881	5,249	56	84	952	(7,502)	370,937	83,832	12,472	8,453	140,595	(53,606)
SUB-Power Fuse	2,823	67	1,952			(436)	26,593	355	11,712			(7,440)
SUB-Structure				7,885						134,029		
SUB-Switch/Automatic				79	1,288	1,209				7,035	77,490	70,455
SUB-Switch/Manual/AB/Disc/LBD	22,157	4			1,825	(3,770)	486,661	1,982			104,495	(65,608)
SUB-Transformer	7,719			1,804	71	(1,926)	118,942			14,468	16,717	(27,695)
UG-Elbows	480	937	144	412	254	(98)	274,811	212,896	38,867	88,214	48,470	(57,736)
UG-Lightning Arrester	120	76	148	139	34	(11)	21,331	12,064	22,618	8,315	6,857	(3,270)
UG-Load Break Junctions	73	164	70	12	95	(11)	16,468	58,516	18,213	3,395	41,801	(446)
UG-Low Tension Network	5		3,070			1,533	315		53,304			26,495
UG-Other Equipment(explain)	1,444	7	130	54	265	(231)	155,257	795	18,348	6,717	60,309	(18,397)
UG-Pads/Vaults/MHs & Splice Boxes	102	801	408	432	147	(28)	18,971	150,036	64,039	67,739	55,498	(924)
UG-PRI Splices and Connectors	343	791	466	2,772	693	268	38,591	53,784	19,972	256,673	179,065	48,384
UG-Primary Cable/Neutral	15,006	12,565	16,972	11,435	16,746	235	2,304,340	2,377,282	2,727,774	2,047,963	3,263,627	158,926
UG-Riser Pole Equip & Devices	306	948	2,969	875	3,221	576	41,973	131,556	268,668	135,049	406,588	73,272
UG-SEC Splices and Connectors	2	33	63	6	13	(1)	324	1,193	11,420	513	3,020	471
UG-Secondaries/Services	310	377	563	303	478	26	50,241	80,910	131,513	63,036	92,554	6,675
UG-Switchgear	441	712	1,164	874	3,125	553	87,554	142,733	160,148	240,217	308,646	53,967
UG-Transformer/Transformer Fuse	1,041	2,915	2,647	2,085	1,758	60	232,250	336,981	507,851	347,343	443,608	43,308

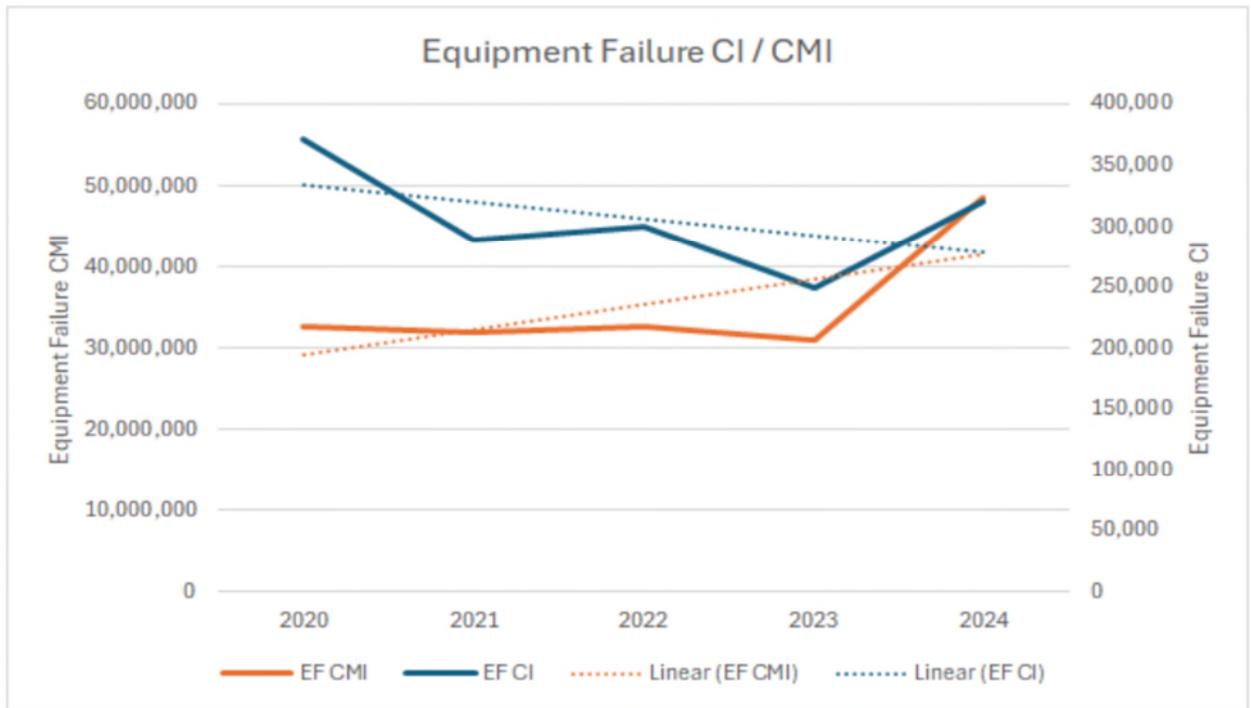
- d. Provide calculations showing the percentage contribution of each asset class to total CI/CMI in each year.

Response: See the table below for percentages based on the table provided in part (c) of this section, *supra*.

Component Desc	% of Equipment Failure CI					% of Equipment Failure CMI				
	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
No Component Entered	0.618%	0.009%	0.000%	0.000%	0.070%	0.096%	0.006%	0.001%	0.000%	0.081%
OH-Capacitor Bank	0.132%	0.354%	0.866%	0.455%	0.000%	0.039%	0.159%	0.180%	0.159%	0.000%
OH-Lightning Arrester	0.729%	0.746%	1.329%	1.879%	0.379%	0.889%	0.923%	1.003%	1.203%	0.499%
OH-Other Equipment(explain)	1.648%	1.198%	3.464%	0.704%	0.954%	1.382%	0.985%	2.532%	0.868%	0.570%
OH-Pole/Arms Attachments	9.533%	15.165%	18.330%	17.148%	16.390%	12.129%	17.313%	18.723%	16.444%	18.298%
OH-PRI Splices and Connectors	4.094%	5.416%	3.469%	5.351%	5.131%	3.004%	4.540%	4.179%	5.158%	4.390%
OH-Primary/Neutral	31.524%	35.876%	29.629%	31.645%	35.409%	43.565%	41.468%	34.799%	40.351%	39.341%
OH-SEC Splices and Connectors	0.461%	0.586%	0.875%	0.767%	0.589%	0.464%	0.654%	0.791%	0.763%	0.441%
OH-Secondaries/Services	0.885%	1.168%	1.405%	1.242%	1.345%	1.135%	1.193%	1.840%	0.972%	1.262%
OH-Switch/Automatic	4.103%	8.762%	10.835%	9.981%	8.601%	4.076%	6.333%	7.436%	8.456%	7.170%
OH-Switch/Manual/AB/Disc/OS/LBD	1.697%	1.974%	2.242%	2.744%	2.185%	1.231%	0.935%	1.671%	1.655%	4.781%
OH-Tap Fuse/Cutout	2.094%	2.467%	2.989%	3.018%	2.767%	2.578%	2.911%	3.025%	3.233%	4.190%
OH-Transformer	1.967%	2.839%	2.292%	2.178%	1.631%	3.755%	3.684%	3.872%	2.361%	2.541%
OH-Transformer Fuse/Cutout	5.627%	6.430%	6.218%	6.721%	4.890%	6.766%	6.369%	6.366%	6.263%	4.359%
OH-Transmission	3.455%	3.395%	0.000%	2.597%	7.676%	0.476%	0.301%	0.000%	0.387%	1.070%
SUB-Circuit Breaker	7.630%	3.242%	0.358%	1.077%	1.293%	5.411%	0.638%	0.032%	0.337%	0.161%
SUB-Control/Relay	0.000%	0.253%	0.208%	0.000%	0.000%	0.000%	0.029%	0.082%	0.000%	0.000%
SUB-Insulator	0.000%	1.227%	4.867%	0.759%	1.039%	0.000%	0.098%	0.716%	0.341%	0.052%
SUB-Lightning Arrester	0.000%	0.000%	0.329%	0.000%	0.000%	0.000%	0.000%	0.256%	0.000%	0.000%
SUB-Other Equipment(Explain)	9.677%	1.820%	0.019%	0.034%	0.297%	1.136%	0.264%	0.038%	0.027%	0.289%
SUB-Power Fuse	0.761%	0.023%	0.652%	0.000%	0.000%	0.081%	0.001%	0.036%	0.000%	0.000%
SUB-Structure	0.000%	0.000%	0.000%	3.163%	0.000%	0.000%	0.000%	0.000%	0.432%	0.000%
SUB-Switch/Automatic	0.000%	0.000%	0.000%	0.032%	0.401%	0.000%	0.000%	0.000%	0.023%	0.159%
SUB-Switch/Manual/AB/Disc/LBD	5.976%	0.001%	0.000%	0.000%	0.569%	1.491%	0.006%	0.000%	0.000%	0.215%
SUB-Transformer	2.082%	0.000%	0.000%	0.724%	0.022%	0.364%	0.000%	0.000%	0.047%	0.034%
UG-Elbows	0.129%	0.325%	0.048%	0.165%	0.079%	0.842%	0.669%	0.119%	0.284%	0.100%
UG-Lightning Arrester	0.032%	0.026%	0.049%	0.056%	0.011%	0.065%	0.038%	0.069%	0.027%	0.014%
UG-Load Break Junctions	0.020%	0.057%	0.023%	0.005%	0.030%	0.050%	0.184%	0.056%	0.011%	0.086%
UG-Low Tension Network	0.001%	0.000%	1.025%	0.000%	0.000%	0.001%	0.000%	0.164%	0.000%	0.000%
UG-Other Equipment(explain)	0.389%	0.002%	0.043%	0.022%	0.083%	0.476%	0.003%	0.056%	0.022%	0.124%
UG-Pads/Vaults/MHs & Splice Boxes	0.028%	0.278%	0.136%	0.173%	0.046%	0.058%	0.472%	0.197%	0.218%	0.114%
UG-PRI Splices and Connectors	0.093%	0.274%	0.156%	1.112%	0.216%	0.118%	0.169%	0.061%	0.827%	0.368%
UG-Primary Cable/Neutral	4.047%	4.357%	5.669%	4.587%	5.220%	7.059%	7.475%	8.381%	6.598%	6.711%
UG-Riser Pole Equip & Devices	0.083%	0.329%	0.992%	0.351%	1.004%	0.129%	0.414%	0.826%	0.435%	0.836%
UG-SEC Splices and Connectors	0.001%	0.011%	0.021%	0.002%	0.004%	0.001%	0.004%	0.035%	0.002%	0.006%
UG-Secondaries/Services	0.084%	0.131%	0.188%	0.122%	0.149%	0.154%	0.254%	0.404%	0.203%	0.190%
UG-Switchgear	0.119%	0.247%	0.389%	0.351%	0.974%	0.268%	0.449%	0.492%	0.774%	0.635%
UG-Transformer/Transformer Fuse	0.281%	1.011%	0.884%	0.836%	0.548%	0.711%	1.060%	1.560%	1.119%	0.912%

- e. Quantify the magnitude of the alleged increase in equipment-related outages (CI and CMI) over the last five years.

Response: Equipment failure related to CI and CMI are shown below. Trendlines are included. Note that while the 2020-2024 CI trend is decreasing, the period 2023 through YTD 2025 is showing an increase.



f. Provide the statistical trend (slope, R^2) of equipment failure CI and CMI for 2020–2024.

Response: CI: slope = -13,900; $R^2 = 0.24$. CMI: slope = 3,121,120; $R^2 = 0.44$.

g. Provide cause-coded failure attribution for each asset type (e.g., age, vegetation, weather, animal contact, third-party damage) identified on page 41 of Appendix A.

Response: See the following table providing the 2020-2024 combined cases by component by cause:

Component Desc	Animals	Contact/Dig-In	Directed by Non-PPL Authority	Equipment Failures	Improper Design	Improper Installation	Improper Operation	Nothing Found (Explain)	Other-Controllable (Explain)	Other-Non Control (Explain)	Other-Public (Explain)	Scheduled Outage	Trees-Not Trimming Related	Trees-Trimming Related	Unknown	Vehicles
No Component Entered	2	2	4	9				42	3	18	1	4	45	5		3
OH-Capacitor Bank	5			11							1	7	16	7		1
OH-Lightning Arrester	64			360				6	1	22		73	30	20		4
OH-Other Equipment(explain)	33	2	11	467			1	65	41	86	30	175	155	56		24
OH-Pole/Arms Attachments	61	37	20	1,823		1		17	20	106	7	8,808	2,070	360		2,213
OH-PRI Splices and Connectors	11	2	3	307				4	1	21	3	55	390	156		8
OH-Primary/Neutral	3,132	183	59	3,434	7	9	6	1,331	82	321	50	2,534	38,378	8,904		649
OH-SEC Splices and Connectors	14	2	1	1,049				9	21	18	1	168	99	69		5
OH-Secondaries/Services	255	121	104	2,476		1		78	52	230	28	3,408	5,920	1,890		339
OH-Switch/Automatic	47	3	6	288	1		12	188	5	13		73	83	19		11
OH-Switch/Manual/AB/Disc/OS/LBD	71	1	1	175			1	43	5	9	3	95	58	13		15
OH-Tap Fuse/Cutout	2,668	19	16	1,567	1	3	3	1,586	14	127	4	532	1,363	564	1	117
OH-Transformer	540	10	6	4,183				109	27	91	2	4,193	754	209		93
OH-Transformer Fuse/Cutout	13,506	44	71	6,812	1	2		1,884	55	337	4	4,237	1,434	825		304
OH-Transmission	3	1		51	1			22	2	21	5	27	36	30	1	12
SUB-Circuit Breaker	18			42	1			18				9	2			
SUB-Control/Relay				3			3		11	4						
SUB-Insulator	3			19												
SUB-Lightning Arrester	2			1				1				2				
SUB-Other Equipment(Explain)	3			49			1		2	6						
SUB-Power Fuse	4			4									1			
SUB-Structure	21	1		4												
SUB-Switch/Automatic	8			2				1				2				
SUB-Switch/Manual/AB/Disc/LBD				25			2									
SUB-Transformer	15			12								8	2			
UG-Elbows		1	1	44					2	3		13				
UG-Lightning Arrester	3			50						3		3	1	1		
UG-Load Break Junctions	3	1		15				2	1			24				1
UG-Low Tension Network				7				2								
UG-Other Equipment(explain)		1	3	63				9	1	6	1	23	2	4		3
UG-Pads/Vaults/MHs & Splice Boxes	1	1		56				1	1			164				14
UG-PRI Splices and Connectors	3	6		48								17	1	1		2
UG-Primary Cable/Neutral	37	175	2	1,827			1	41	5	14	2	588	37	8		5
UG-Riser Pole Equip & Devices	328	1	1	234		1		63	5	8		93	27	15		9
UG-SEC Splices and Connectors		2		18								6				
UG-Secondaries/Services	6	218	5	508		1		12	5	19	5	558	11	1		12
UG-Switchgear	10	4	1	83				4		2		69	3	1		11
UG-Transformer/Transformer Fuse	27	23	1	533				32	2	13	1	428	8	6		65

h. Explain how PPL Electric differentiates true “age-related” failures from externally caused failures.

Response: PPL Electric does not track “age-related” failures because age may be just one of the factors for why an asset reaches end of life.

i. Provide the linkage between average age for each asset class (App’x A, p. 40) and the CI/CMI contributions for those same assets (App’x A, p. 41).

Response: See Attachment 1 and the table provided in response to part (c) of this section, *supra*.

- j. Identify which asset classes with high failure contributions are also above design-life thresholds.

Response: See Attachment 1 and the response to part (a) in Section I.G.1, *supra*.

- k. Identify which failure categories identified on page 41 of Appendix A drive the proposed \$627.63 million increase in System Reliability Improvement Projects, including budget allocation by asset type.

Response: As stated in response to part (e) in Section I.G.1, *supra*, and on page 36 of the LTIP, the System Reliability Improvement Projects are initiated to address reliability concerns and harden the system to withstand severe weather events. This category of projects is not driven by age of assets or end-of-life failures.

- l. Explain the relationship between the failure data presented on Appendix A, page 41, and the scope of individual System Reliability Improvement Projects.

Response: As stated in response to part (e) in Section I.G.1, *supra*, and on page 36 of the LTIP, the System Reliability Improvement Projects are initiated to address reliability concerns and harden the system to withstand severe weather events. This category of projects is not driven by age of assets or end-of-life failures.

- m. Explain the year-over-year volatility in CI/CMI for major asset types and how this volatility influenced budget development.

Response: The volatility in severe weather events can have a large effect on the volatility of customers interrupted and customer minutes interrupted year over year. In the 2020-2024 time frame, total storm volume has varied by 67% (2023 vs 2020), and PUC storm volume has varied by 113% (2024 vs 2020).

- n. Identify which specific failure modes increased materially versus those that remained stable.

Response: As measured by outages cases, for the period 2020-2024, tree related outages and animal contacts have increased materially. Equipment failures have increased mildly. See the table below:

Trouble Year	2020	2021	2022	2023	2024	Slope
Animals	3,918	3,345	4,317	4,436	4,888	303
Contact/Dig-In	183	159	162	164	193	3
Directed by Non-PPL Authority	72	64	62	67	51	-4
Equipment Failures	5,223	5,356	5,727	4,759	5,594	15
Improper Design	2	1		3	6	1
Improper Installation	4	1	3	4	6	1
Improper Operation	13	4	2	4	7	-1
Nothing Found (Explain)	1,013	1,046	966	1,047	1,498	97
Other-Controllable (Explain)	88	90	61	54	71	-7
Other-Non Control (Explain)	210	287	181	348	472	59
Other-Public (Explain)	30	32	25	31	30	0
Scheduled Outage	6,240	5,377	5,237	4,322	5,220	-310
Trees-Not Trimming Related	7,857	10,823	9,488	9,008	13,750	997
Trees-Trimming Related	1,497	2,247	2,064	2,397	4,959	707
Unknown	1			1		0
Vehicles	767	788	824	769	772	-1

- o. Separate distribution substation failures from transmission substation failures and provide CI/CMI for each.

Response: See the table below:

	Total Distribution: 2020 - 2024	Total Transmission: 2020 - 2024
Outages	164	1
CI	166,991	4
CMI	4,713,664	1,982

- p. Explain why the LTIP does not distinguish between substation types when claiming age-related deterioration.

Response: The LTIP does not distinguish between transmission and distribution substation types because the LTIP only includes distribution assets.

- q. Provide a comparison of age-related equipment failures (CI and CMI per 1,000 customers) for PPL Electric as compared to other Pennsylvania EDCs.

Response: PPL Electric does not have data for the other Pennsylvania EDCs and, therefore, cannot make this comparison.

- r. Demonstrate whether PPL Electric’s age-related failure rate is above, below, or consistent with industry norms.

Response: PPL Electric does not have data for all other electric utilities and, therefore, cannot make this comparison.

Rosemary Chiavetta, Secretary
December 30, 2025
Page 18

Based on the foregoing, PPL Electric maintains that through its Petition, its answers to TUS's data requests, and the information provided in this letter, the Company has demonstrated that its proposed "major" modification is reasonable and in the public interest. Thus, PPL Electric respectfully requests that the Commission approve the Petition.

Respectfully submitted,



Devin Ryan

DR/bfc
Enclosures

cc: Clinton McKinley. (*via email; w/attachments*)
Certificate of Service

Blank Report

Component Asset Type	Component Desc	Utility Account*	2020		2021		2022		2023		2024	
			CI	CMI	CI	CMI	CI	CMI	CI	CMI	CI	CMI
Distribution	OH-Capacitor Bank	368.2 - Line Transformers - Overhead Type (not in LTIP cat.)	490	12,697	1,067	54,674	2,980	167,085	1,338	93,899	522	98,847
Distribution	OH-Lightning Arrester	365.0 - Overhead Conductors, Device	3,167	341,129	3,024	440,689	4,135	377,860	6,227	617,953	1,936	399,439
Distribution	OH-Other Equipment(Explain)		15,454	1,361,347	14,747	1,240,792	20,659	1,630,478	10,104	1,065,781	16,261	3,051,678
Distribution	OH-Pole/Arms Attachments	364.4 - Poles and Fixtures	139,781	21,000,530	176,423	31,409,527	206,140	30,345,684	160,052	29,888,647	237,022	78,078,496
Distribution	OH-PRI Splices and Connectors	365.0 - Overhead Conductors, Device	19,375	2,019,244	23,293	5,900,531	14,542	3,460,822	21,052	5,649,395	39,135	12,547,827
Distribution	OH-Primary/Neutral	365.0 - Overhead Conductors, Device	674,592	115,723,452	828,295	179,566,849	717,856	143,016,129	667,530	149,695,404	1,180,850	505,644,397
Distribution	OH-SEC Splices and Connectors	365.0 - Overhead Conductors, Device	1,910	179,086	1,918	258,213	2,755	278,140	2,094	288,510	2,277	356,433
Distribution	OH-Secondaries/Services	365.0 - Overhead Conductors, Device	11,099	1,936,302	15,014	2,601,504	15,322	2,444,078	13,840	2,273,197	23,361	8,029,077
Distribution	OH-Switch/Automatic	365.0 - Overhead Conductors, Device	36,517	2,909,207	52,534	4,633,433	65,960	4,704,394	52,181	5,874,956	46,237	9,019,935
Distribution	OH-Switch/Manual/AB/Disc/OS/LBD	365.0 - Overhead Conductors, Device	11,029	692,742	10,432	765,707	10,940	853,696	11,362	847,167	17,935	5,239,113
Distribution	OH-Tap Fuse/Cutout	365.0 - Overhead Conductors, Device	29,232	3,871,609	33,137	5,835,723	32,765	4,869,902	34,007	5,164,737	48,861	15,374,435
Distribution	OH-Transformer	368.2 - Line Transformers - Overhead Type (not in LTIP cat.)	8,434	1,516,527	13,134	2,270,629	11,378	2,012,492	10,377	2,017,591	10,389	4,809,577
Distribution	OH-Transformer Fuse/Cutout	365.0 - Overhead Conductors, Device	38,118	3,930,816	33,508	3,991,573	36,327	3,992,539	34,945	4,234,449	37,952	6,492,828
Distribution	UG-Elbows	367 - Underground Conductors	522	276,742	950	224,327	149	39,417	546	92,565	290	60,355
Distribution	UG-Lightning Arrester		120	21,331	108	15,034	177	26,080	145	9,225	35	6,943
Distribution	UG-Load Break Junctions	367 - Underground Conductors	102	29,199	168	59,057	73	19,165	50	7,824	95	41,801
Distribution	UG-Low Tension Network		6	1,044			3,286	104,259				
Distribution	UG-Other Equipment(Explain)		1,447	156,340	3,300	147,279	203	35,291	126	13,713	337	100,851
Distribution	UG-Pads/Vaults/MHs & Splice Boxes	368.4 - Submersible or Padmt Type	208	32,068	920	152,139	420	65,899	443	70,125	184	62,252
Distribution	UG-PRI Splices and Connectors	367 - Underground Conductors	391	49,527	1,105	144,037	499	45,046	2,851	266,561	734	187,621
Distribution	UG-Primary Cable/Neutral	367 - Underground Conductors	18,109	2,684,288	18,278	2,983,812	24,391	3,450,094	13,443	2,656,587	20,945	4,588,750
Distribution	UG-Riser Pole Equip & Devices	366 - Underground Conduit (not in LTIP cat.)	1,387	144,173	2,172	292,304	5,265	451,299	2,532	284,183	4,856	634,175
Distribution	UG-SEC Splices and Connectors	367 - Underground Conductors	2	324	33	1,193	66	12,020	14	5,529	13	3,020
Distribution	UG-Secondaries/Services	367 - Underground Conductors	520	87,155	1,258	139,500	745	168,479	802	150,018	796	184,097
Distribution	UG-Switchgear	367 - Underground Conductors	682	132,314	725	145,420	1,615	191,663	934	249,979	3,331	336,348
Distribution	UG-Transformer/Transformer Fuse	368.4 - Submersible or Padmt Type	1,821	306,922	3,958	485,877	2,884	548,382	3,523	449,584	2,136	591,666
Substation	SUB-Circuit Breaker	362.0 - Station Equipment	36,390	1,957,832	19,432	336,644	2,879	35,808	5,885	236,133	13,277	661,059
Substation	SUB-Control/Relay	362.0 - Station Equipment	24,348	1,988,292	5,047	61,784	622	26,665				
Substation	SUB-Insulator	362.0 - Station Equipment			3539	31055	14572	233048.97	5892	154523.61	3334	25387.29
Substation	SUB-Lightning Arrester	362.0 - Station Equipment					986	83455.04	1745	10592.19	521	8336
Substation	SUB-Other Equipment(Explain)		38,166	403,812	11,422	691,107	2,585	160,063	2,206	30,722	952	140,595
Substation	SUB-Power Fuse	362.0 - Station Equipment	2,823	26,593	67	355	4,100	40,762	238	100,481	2	532
Substation	SUB-Structure		7,977	115,204	792	11,793	27,107	1,212,305	7,885	134,029	127	20,580
Substation	SUB-Switch/Automatic	362.0 - Station Equipment			3326	30847.18			314	193009.25	8019	192736.58
Substation	SUB-Switch/Manual/AB/Disc/LBD	362.0 - Station Equipment	22,157	486,661	4	1,982					1,949	106,261
Substation	SUB-Transformer		7,719	118,942	2	14	5,481	57,884	2,105	33,659	9,913	334,603
Transmission	OH-Transmission		44,098	1,109,813	21,945	278,772	11,704	499,294	57,455	1,399,665	47,111	3,276,573
Unknown	No Component Entered		13,948	792,470	4,341	228,343	5,651	737,653	2,470	322,995	10,737	3,288,820

*For any cells in the Utility Account column that are blank, they do not have a Utility Account number listed because they are "minor items" of a retirement unit or are an "other" category that includes multiple components.

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 30, 2025



Devin T. Ryan

I, Steven D. Selkregg, being the Director of Asset Management at PPL Electric Utilities Corporation, hereby state that the information set forth in the foregoing is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

12/30/2025

Date

Signed by:

Steven Selkregg

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Steven D. Selkregg