

PENNSYLVANIA PUBLIC UTILITY COMMISSION
Harrisburg, Pennsylvania 17105-3265

**REVISION OF 52 PA. CODE CHAPTER 57
PERTAINING TO ADDING INSPECTION,
MAINTENANCE, REPAIR, AND
REPLACEMENT STANDARDS FOR
ELECTRIC DISTRIBUTION COMPANIES**

**PUBLIC MEETING –
MAY 22, 2008
MAY-2008-LAW-0021*
DOCKET NO: L-00040167**

MOTION OF COMMISSIONER TYRONE J. CHRISTY

I support the promulgation of these regulations that establish inspection, maintenance, repair and replacement standards for electric distribution companies (EDCs). I believe that these standards will provide the Commission with an important tool to advance our obligation to ensure that EDCs maintain the safety and reliability of the electric system.

My motion today concerns the consideration of additional standards for the inspection, maintenance and repair of neutral connections, which are not addressed by today's rulemaking. Recently the Commission considered two customer complaint proceedings involving voltage fluctuations caused by the failure of neutral connections. *Kelley v. Pennsylvania Electric Company*, Docket No. C-20066673 (Order entered May 2, 2008); *Strickhouser v. Metropolitan Edison Company*, Docket No. C-20077273 (Order entered December 20, 2007). Both proceedings involved the failure of neutral connections that caused substantial damage to the customers' appliances. In one of the cases, the customer's appliances were smoking and his surge protectors melted into and blackened the carpets. Clearly voltage fluctuations caused by failed neutral connections can cause a fire and hence represent a serious safety concern.

In both cases, the EDCs argued that: neutral connection failure is a natural and foreseeable occurrence caused by corrosion; that 20 years is a reasonable amount of time for a neutral connection to last; that a bad neutral would not be discovered during the EDCs' routine maintenance on a circuit because such connections are not visible to the naked eye; that the failure of a neutral connection is identified only after a trouble call is received from a customer; and that it is not practical or feasible for the company to inspect neutral connections due to the large number of connections on each line. Instead of routinely inspecting and/or replacing neutral connections, the two EDCs rely on customer complaints to identify failed neutral connections without compensating customers for the resulting damages to their appliances.

I question whether these practices regarding neutral connection failures are adequate and reasonable. However, the information summarized above was developed in two customer complaint proceedings, both involving FirstEnergy companies. It is unclear if the FirstEnergy practices are followed by other EDCs in Pennsylvania. In addition, the Commission does not have sufficient information before it to establish standards for the inspection and/or replacement of neutral connections. For that reason, I believe that comments should be solicited from the EDCs and other interested parties on

these issues. After the receipt of comments, the Commission can evaluate the information provided and determine whether or not a subsequent rulemaking to establish standards governing neutral connections is warranted.

THEREFORE, I MOVE THAT:

1. The Commission issue an Order, at a new docket number, soliciting comments on the EDCs' current practices governing the inspection, maintenance, repair and replacement of neutral connections, and on whether the Commission should establish standards governing neutral connections within 52 Pa. Code Chapter 57.

2. The Order be served on the parties that commented on the proposed regulations at this docket number, and published in the *Pennsylvania Bulletin*.

3. The Law Bureau prepare the necessary Order.

DATE

TYRONE J. CHRISTY, COMMISSIONER