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**E-File**

October 11, 2017

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street.  
Harrisburg, PA 17120

**Re:**

**Robert M. Mattu vs. West Penn Power Company  
Docket No.: C-2016-2547322**

Dear Secretary Chiavetta:

PPL Electric Utilities Corporation (“PPL Electric” or “the Company”) submits this letter in support of West Penn Power Company’s (“West Penn”) Petition for Reconsideration of the Pennsylvania Public Utility Commission’s (“Commission”) August 14 Order (“Mattu Order”) in the above referenced matter. PPL Electric understands the Commission’s desire to address customers’ concerns, but the Company submits that the “equitable/fairness” standard created by the Commission in the Mattu Order will create a great deal of uncertainty as to what is permissible activity for utilities operating in Pennsylvania. In particular, PPL Electric is concerned with the applicability of such a standard for vegetation management practices, as vegetation management is crucial to minimizing the potential for electric outages. It is for these reasons that PPL Electric respectfully requests that the Commission grant West Penn’s Petition for Reconsideration.

Vegetation contact with electrical transmission or distribution conductors is a leading cause of power outages. For example, a primary cause of the largest power blackout in North America, which occurred on August 14, 2003, was trees coming into contact with transmission lines. This blackout affected approximately 50 million people in the United States and Canada. Further, trees and other vegetation are capable of conducting electricity and present a serious hazard to the public if they come in contact with electrical facilities.

PPL Electric engages in vegetation management practices similar to those employed by West Penn. PPL Electric’s right-of-way maintenance follows a Commission approved vegetation management plan (“Vegetation Plan”). The Vegetation Plan is designed to be consistent with the American National Standards Institute’s (“ANSI”)

standards and other industry best management practices. PPL Electric's vegetation maintenance activities are also subject to various laws and regulations, and account for and adjust to the particular easement rights PPL Electric has on a property where maintenance is to occur. Further, the Vegetation Plan has been developed to meet the Company's statutory obligation to provide safe and reliable electric service. The evaluation of these factors in the creation of the Vegetation Plan has allowed PPL Electric to maintain its right-of-way corridors in an efficient and effective manner.

Despite PPL Electric's adherence to industry best practices, government regulations and easement rights, there are landowners who object to PPL Electric's activities on their property. It is PPL Electric's policy to meet with and discuss the customer's concerns prior to taking any action. However, even after possible accommodations have been offered, some landowners still object to the necessary maintenance work to be performed. Previously, PPL Electric could be confident that as long as its actions were lawful and reasonable, it could move forward with the necessary maintenance activity. The new "equitable/fairness" standard, however, eliminates the ability of a utility to predict whether its actions will withstand Commission scrutiny. In practice, despite the Commission stating that the Mattu Order holds no precedential value, the new Mattu standard will likely result in customers petitioning the Commission for relief based on nothing more than a belief that they have been treated unfairly or unreasonably by their utility, even when the utility is properly following all applicable laws, regulations and Commission approved plans. Utilities will be unable to adjust their practices to conform to the "equitable/fairness" standard because, by its very nature, it is to be administered on a case by case basis.

As West Penn indicated in its Petition for Reconsideration, the issue here is broader than the vegetation maintenance concerns raised by Mr. Mattu. There are many activities performed by electric utilities to which customers object, but which are nevertheless required for the provision of reliable and safe electric service. Countless decisions are made each day which depend on the careful consideration of industry best practices, applicable laws, and the specific facts pertaining to the situation. These decisions involve situations related to the installation of advanced meters, construction practices, and customer billing disputes to name only a few examples. There is no guidance on when an action will run afoul of the "equitable/fairness" standard.

PPL Electric is concerned that the "equitable/fairness" standard will lead to long term negative consequences for its business and the industry as a whole. It is possible that utilities will begin choosing options that are not as well suited, and less cost effective to deal with a particular situation to accommodate customers and property owners.

Again, PPL Electric understands the Commission's need to address customers' concerns. This is something that PPL Electric does every day, and the Company takes great pride in its customer service. PPL Electric submits that the Mattu Order eliminates the ability of PPL Electric to predict with any certainty whether its actions will be upheld by the Commission, even when such actions are otherwise consistent with applicable

statutes, regulations and Commission orders. Therefore, PPL Electric respectfully requests that West Penn's Petition for Reconsideration be granted.

Thank you for your time and consideration in this matter.

Very truly yours,



Kimberly A. Klock

Cc (via email):

Robert A. Cinpinski, Esquire  
David B. MacGregor, Esquire  
Christopher T. Wright, Esquire  
Margaret A. Morris, Esquire  
John L. Munsch, Esquire