



2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

November 1, 2011

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NOV -1 2011

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: 3rd Quarter 2011 Reliability Report – West Penn Power Company - Pursuant to
52 Pa. Code §57.195(d) and (e)

L-00030161

Dear Secretary Chiavetta:

Enclosed for filing on behalf of West Penn Power Company is an original and six (6) copies of the
3rd Quarter 2011 Reliability Report, pursuant to 52 Pa. Code §57.195(d) and (e).

In addition, pursuant to 52 Pa. Code § 57.198(l), West Penn Power is requesting the Commission's
approval to revise its approved and existing 2011-2012 Biennial Inspection & Maintenance Plan.
West Penn Power is respectfully submitting as an addendum to this Quarterly Reliability Report the
proposed prospective revisions to its Plan and a discussion of the reasons for the revisions.

Please feel free to contact either of us if you have any questions or need additional information
regarding this matter.

Sincerely,

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President, Pennsylvania Operations
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PA PUBLIC UTILITY COMMISSION
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2011 3rd Quarter Reliability Report

West Penn Power Company

Pursuant to 52 Pa. Code § 57.195(d) and (e)

3rd Quarter 2011 Reliability Report – West Penn Power Company

The following 3rd Quarter 2011 Reliability Report is filed on behalf of West Penn Power Company (“West Penn Power”) for the period ending September 30, 2011.

Section 57.195(e)(1): A description of each major event that occurred during the preceding quarter, including the time and duration of the event, the number of customers affected, the cause of the event and any modified procedures adopted in order to avoid or minimize the impact of similar events in the future.

Major Events

West Penn Power did not experience a major event during the reporting period ending September 30, 2011.

Section 57.195(e)(2): Rolling 12-month reliability index values (SAIFI, CAIDI, SAIDI, and if available MAIFI) for the EDC's service territory for the preceding quarter. The report shall include the data used in calculating the indices, namely the average number of customers served, the number of sustained customer interruptions, the number of customers affected, and the customer minutes of interruption. If MAIFI values are provided, the report shall also include the number of customer momentary interruptions.

Reliability Index Values

3Q 2011 (12-Mo Rolling)	West Penn Power		
	Benchmark	12-Month Standard	12-Month Actual
SAIFI	1.05	1.26	1.34 ¹
CAIDI	170	204	136
SAIDI	179	257	182
Customers Served ²	715,397		
Number of Sustained Interruptions	19,094		
Customers Affected	958,947		
Customer Minutes	130,360,701		

West Penn Power results for 3rd Quarter 2011 are:

West Penn Power	
CAIDI	33% better than Commission's 12-Month Standard 20% better than Commission's Benchmark
SAIDI	29% better than Commission's 12-Month Standard

¹ The higher-than-normal SAIFI is directly attributed to several non-excludable storm events.

² Represents the average number of customers served during the reporting period.

Section 57.195(e)(3): Rolling 12-month reliability index values (SAIFI, CAIDI, SAIDI, and if available, MAIFI) and other pertinent information such as customers served, number of interruptions, customer minutes interrupted, number of lockouts, and so forth, for the worst performing 5% of the circuits in the system. An explanation of how the EDC defines its worst performing circuits shall be included.

Worst Performing Circuits – Reliability Indices

West Penn Power's ranking of the 5% Worst Performing Circuits are provided in Attachment A of this report.

Section 57.195(e)(4): Specific remedial efforts taken and planned for the worst performing 5% of the circuits identified in paragraph (3).

Worst Performing Circuits – Remedial Action

West Penn Power's Remedial Actions for its 5% Worst Performing Circuits are provided in Attachment B of this report.

Section 57.195(e)(5): A rolling 12-month breakdown and analysis of outage causes during the preceding quarter, including the number and percentage of service outages, the number of customers interrupted, and customer interruption minutes categorized by outage cause such as equipment failure, animal contact, tree related, and so forth. Proposed solutions to identified service problems shall be reported.

Outages by Cause

Outages by Cause – West Penn Power

Outages by Cause				
3rd Quarter 2011 12-Month Rolling	West Penn Power			
Cause	Customer Minutes	Number of Sustained Interruptions	Customers Affected	% Based on Number of Outages
Off Right-of-Way Trees	46,188,146	4,822	233,054	25%
Weather	26,512,025	2,587	156,958	14%
Unknown	13,466,302	1,976	106,401	10%
Overhead Material	8,213,936	1,930	93,137	10%
Public	11,192,961	1,633	124,601	9%
Overhead Equipment	3,351,058	1,545	34,516	8%
Animals	2,120,536	1,471	33,234	8%
Overhead Wire	6,861,734	1,180	70,832	6%
On Right-of-Way Trees	7,451,782	1,005	50,446	5%
Underground Cable	1,651,815	512	8,252	3%
Other	1,493,235	209	21,144	1%
Underground Equipment	482,832	119	3,254	1%
Substation Equipment	1,308,301	68	22,592	0%
Underground Material	34,379	28	284	0%
Service Equipment	31,659	9	242	0%
TOTAL	130,360,701	19,094	958,947	100%

Proposed Solutions – West Penn Power

Reliability Improvement Program (RIP)

West Penn Power maintains a Reliability Improvement Program to help address poor performing distribution circuits. Many of the Ensure Reliability Service (ERS) programs, such as Annual Inspection and Maintenance (AIM), Pole Inspection, Vegetation Maintenance, etc., are performed on a scheduled basis. *RIP provides a way to address circuit reliability problems outside of these scheduled maintenance activities.*

The RIP teams conduct a detailed review of the poorest performing circuits and, if necessary, an improvement plan is developed. In addition to the poor performing circuits, the RIP teams will also investigate any circuit which has been interrupted multiple times in the prior twelve month period and corrective action is planned as necessary. To focus on isolated problems, the RIP teams will also investigate any sectionalizing device (line fuse or recloser) that has operated multiple times in a twelve month period and corrective action is planned as necessary.

Expanded Forestry Danger Tree Program

West Penn Power's Danger Tree Program consists of removing, or significantly reducing in height, diseased or damaged trees located outside the boundary of the right-of-way (off ROW) that pose a threat to service reliability and/or the integrity of the line under any weather condition. Beginning in 2003, West Penn Power began targeting live, healthy trees as well that pose a threat to service reliability and/or integrity of the line by uprooting, breaking, or otherwise falling into the line.

In May 2011, West Penn Power instituted a special Danger Tree Inspection and Removal on 636 miles of mainline feeder on 143 distribution circuits identified as having the worst performance from tree-caused lockouts. This program is scheduled to be completed by the end of July and is in addition to West Penn Power's cycle tree trimming work that is scheduled for 2011.

Reliability-based Vegetation Management Program

Rural distribution circuits are scheduled based on a predetermined formula which factors in time since last trimmed, tree related CMI over at least three years, and the number of customers on the circuit. Rural circuits with the worst cumulative ranking should be made highest priority when scheduling. Circuits trimmed within the past three years are not eligible for schedule trimming evaluation. Urban distribution circuits are planned on a cyclical schedule based on time since last trimmed. If multiple urban circuits are scheduled for the same year, reliability stats will further prioritize for scheduling purposes.

Section 57.195(e)(6): Quarterly and year-to-date information on progress toward meeting transmission and distribution inspection and maintenance goals/objectives (for first, second and third quarter reports only).

T&D Inspection and Maintenance Programs

Inspection and Maintenance 2011		West Penn Power		
		Planned	Completed	
		Annual	3Q	YTD
Forestry	Transmission (Miles)	144 ³	59	107
	Distribution (Miles)	2,800	1,262	2,248
Transmission	Aerial Patrols	2	0	1
	Groundline	167	7	7
Substation	General Inspections	5,050	1,495	4,084
	Transformers	390	46	271
	Breakers	271	58	271
	Relay Schemes	536	152	273
Distribution	Capacitors	1,331	8	1,301
	Poles	52,395	34,648	34,989
	Reclosers	337	84	138
	Radio-Controlled Switches	West Penn Power has no radio-controlled switches.		

³ Plan number changed from 125 to 144 due to additional mileage being added

Section 57.195(e)(7): Quarterly and year-to-date information on budgeted versus actual transmission and distribution operation and maintenance expenditures in total and detailed by the EDC's own functional account code or FERC account code as available. (For first, second and third quarter reports only).

Budgeted vs. Actual T&D Operation & Maintenance Expenditures⁴

T&D O&M - 3Q/YTD September 30, 2011					
Category	3Q Actuals	3Q Budget	YTD Actual	YTD Budget	Annual Budget
Distribution Administration	(1,004,340)	(200,847)	(2,510,704)	(689,561)	(890,209)
Distribution System Operations	328,712	297,460	1,063,176	1,093,659	1,391,119
Asset Management	156,795	150,815	272,541	454,070	587,144
Distribution Support	2,073,321	2,245,494	7,061,796	5,864,853	8,033,641
Field Operations	4,066,246	4,612,204	14,647,922	14,019,407	17,744,239
Distribution Forestry	1,187,970	3,401,439	6,561,279	11,160,277	13,691,518
Transmission Other	14,358	121,678	323,421	402,671	534,731
Substations	1,482,744	973,694	3,858,645	2,912,785	3,836,786
Technical Services - Delivery	468,748	578,608	1,769,595	1,842,546	2,421,154
Transmission Forestry	1,634,781	737,942	2,469,054	1,842,096	2,318,254
Transmission Projects	50,672	92,743	95,279	285,249	368,561
Transmission Siting	130,139	124,387	378,696	412,895	763,312
Distribution Safety, Training, Quality Assurance	82,870	162,498	365,772	516,970	646,913
Transmission Reliability and System Support	21,280	34,302	105,103	102,321	136,514
EMS Support	168,361	172,432	567,813	570,496	725,576
Transmission System Operations	297,899	258,117	1,053,917	944,233	1,212,273
Transmission Operations Administration	11,205	19,975	53,364	71,950	91,925
Transmission Engineering and Operations Administration	45,551	110,833	220,520	327,862	427,269
Transmission Planning and Compliance	51,329	82,880	194,131	271,247	351,672
Transmission Engineering	626,605	719,948	2,243,109	2,339,194	3,097,768
Total	11,895,243	14,696,601	40,794,429	44,745,201	57,490,160

⁴ Budgets based upon estimates and subject to change

Section 57.195(e)(8): Quarterly and year-to-date information on budgeted versus actual transmission and distribution capital expenditures in total and detailed by the EDC's own functional account code or FERC account code as available. (For first, second and third quarter reports only).

Budgeted vs. Actual T&D Capital Expenditures⁵

T&D Capital - 3Q/YTD September 30, 2011					
Category	3Q Actuals	3Q Budget	YTD Actual	YTD Budget	Annual Budget
EHV Substations	221,945	1,598,742	877,266	3,361,121	3,859,969
EHV Lines	(94,291)	1,338,970	(771,788)	3,761,259	3,804,002
Transmission Substation	615,251	2,181,254	1,987,960	5,695,438	7,437,622
Transmission Lines	1,506,349	6,361,987	6,902,375	19,178,670	21,390,630
Distribution Substations	2,106,565	4,978,566	6,575,781	9,967,509	11,988,728
Distribution Lines	21,462,943	12,146,493	46,637,456	34,940,973	44,566,738
General Plant	4,437,360	2,150,818	12,942,850	6,451,098	7,087,482
Subtransmission Lines	800,683	709,784	3,717,641	363,377	1,197,351
Total	31,056,804	31,466,614	78,869,540	83,719,446	101,332,523

⁵ Budgets based on estimates and subject to change

Section 57.195(e)(9): Dedicated staffing levels for transmission and distribution operation and maintenance at the end of the quarter, in total and by specific category (for example, linemen, technician, and electrician).

Staffing Levels

West Penn Power 2011					
Department	Staff	1Q	2Q	3Q	4Q
Line	Leader / Chief	88	86	86	
	Lineman	179	176	175	
Substation	Leader	14	14	14	
	Electrician	47	51	51	
	Total	328	327	326	

Section 57.195(e)(10): Quarterly and year-to-date information on contractor hours and dollars for transmission and distribution operation and maintenance.

Contractor Expenditures

Contractor expenses are billed on a lump sum basis and as such, hourly information is not available.

Contractor Expenditures 2011 (\$)					
	1Q	2Q	3Q	4Q	Total
West Penn Power	891,214	598,346	1,069,762		2,559,322

Section 57.195(e)(11): Monthly call-out acceptance rate for transmission and distribution maintenance workers presented in terms of both the percentage of accepted calls-out and the amount of time it takes the EDC to obtain the necessary personnel. A brief description of the EDC's call-out procedure should be included when appropriate.

Call-out Acceptance Rate

Call-out percentage is defined as the number of positive responses to total calls.

Call-out Acceptance Rate - 2011	
	West Penn Power
January	41%
February	39%
March	42%
April	30%
May	32%
June	29%
July	22%
August	29%
September	28%

Call-out Acceptance Rate

Larger utilities report the amount of time it takes to obtain the necessary personnel during call-outs. West Penn Power has worked with other utilities to ensure consistency in calculating and reporting this data.

West Penn Power					
2011	Total Call-Outs	Workers Accepting	Elapsed Time (Minutes)	Average Response Time per Crew Call-Out (Minutes)	Average Response Rate Per Workers Accepting (Minutes)
July	1,555	1,105	7,450	7.82	6.74
August	991	821	4,810	6.82	5.86
September	982	773	4,295	6.33	5.56
3Q Total	3,528	2,699	16,555	6.69	6.05

Total Call-outs = Total number of incidents

Workers Accepting = Total number of employees accepting work offered

Elapsed Time = Time of day called minus time of day accepted (expressed in minutes)

Average Response Time Per Crew Call-Out = Elapsed Time divided by Total Call-Outs

Average Response Time Per Workers Accepting = Elapsed Time divided by Workers Accepting

ATTACHMENT A

Worst Performing Circuits - Reliability Indices

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West Penn Power calculates the DCII to provide a single index for ranking circuits. The DCII compares the SAIFI, SAIDI, CAIDI and ASAI for each circuit to the 5-year system averages of each index and combines them into a single index.

West Penn Power										
Circuit Rank	Substation	Circuit Desc	Average Customers	Outages	Customer Minutes	Customers Affected	DCII	SAIDI	SAIFI	CAIDI
1	MERRITTSTOWN	BRIER HILL	425	23	89,987	763	69	212	1.80	118
2	MERRITTSTOWN	REPUBLIC	1,627	22	561,166	1,620	57	345	1.00	346
3	WEST FINLEY	WEST FINLEY	131	15	34,166	250	65	261	1.91	137
4	VESTABURG DISTRIBUTION	MEXICO	591	22	80,017	773	78	135	1.31	104
5	FOOTDALE	FOOTDALE	1,212	24	39,911	558	91	33	0.46	72
6	LAGONDA	PROSPERITY	480	43	338,244	1,195	32	704	2.49	283
7	EAST MILLSBORO	EAST MILLSBORO	171	44	272,666	1,180	-40	1595	6.90	231
8	MARIANNA	TEN MILE	349	38	421,180	1,287	-2	1206	3.69	327
9	MARIANNA	MARIANNA	753	27	66,063	543	83	88	0.72	122
10	MERRITTSTOWN	MERRITTSTOWN	860	6	29,310	398	91	34	0.46	74
11	MAXWELL	MAXWELL	206	7	60,021	226	63	291	1.10	266
12	WATERVILLE	WATERVILLE	355	58	880,050	3,714	-109	2480	10.46	237
13	AMITY	AMITY	515	29	209,148	934	55	406	1.81	224
14	VESTABURG DISTRIBUTION	LOW HILL	704	36	131,437	941	73	187	1.34	140
15	LONG FARM SHAFT	LONG FARM SHAFT	123	4	18,892	143	76	154	1.16	132
16	VANCEVILLE	VANCEVILLE	1,350	111	474,364	2,973	57	351	2.20	160
17	NORTH UNION	OLIVER	758	58	274,989	2,491	51	363	3.29	110
18	DRIFTWOOD	DRIFTWOOD	973	144	1,773,756	4,211	-41	1823	4.33	421
19	PANCAKE	STRABANE	324	5	707	9	95	2	0.03	79
20	VESTABURG DISTRIBUTION	FREDERICKTOWN	843	16	153,992	999	74	183	1.19	154
21	LARDIN	MCCLELLANDTOWN	561	25	128,800	1,255	66	230	2.24	103
22	FOOTDALE	NEW SALEM	1,051	17	32,991	482	91	31	0.46	68
23	RICHEYVILLE	CENTERVILLE	931	23	335,316	1,823	58	360	1.96	184
24	PANCAKE	VANCE	385	10	2,586	34	95	7	0.09	76
25	ARENSBURG	ARENSBURG	135	6	20,534	142	77	152	1.05	145

West Penn Power

Circuit Rank	Substation	Circuit Desc	Average Customers	Outages	Customer Minutes	Customers Affected	DOI	SAIDI	SAIFI	CAIDI
26	JOURDAN	COMMERCIAL#1	312	3	22,776	312	85	73	1.00	73
27	MANIFOLD	DAVIS SCHOOL	164	3	7,610	164	87	46	1.00	46
28	NORTH UNION	FAN HOLLOW	575	14	54,650	255	80	95	0.44	214
29	GREENSBORO	POLAND	153	6	41,174	160	65	269	1.05	257
30	BENTLEYVILLE	ELLSWORTH	2,046	68	1,594,728	7,887	22	779	3.85	202
31	RICHEYVILLE	DEEMS	374	4	27,973	89	77	75	0.24	314
32	NORMALVILLE	INDIANHEAD	572	14	597,306	641	-8	1044	1.12	932
33	FRAZIER	WICKHAVEN	737	43	198,197	552	62	269	0.75	359
34	RUTAN	WINDRIDGE	1,185	83	715,036	4,250	34	603	3.59	168
35	ETHEL SPRINGS	PANDORA	1,391	43	1,267,194	1,236	-6	911	0.89	1025
36	NORTH UNION	PHILLIPS	1,439	76	232,734	1,680	76	162	1.17	139
37	HOUSTON	MOMINGER	933	17	451,529	2,081	48	484	2.23	217
38	BETHELBORO	BUTE	514	16	103,577	1,107	68	202	2.16	94
39	SEWICKLEY	WENDEL	734	57	863,604	1,871	1	1177	2.55	462
40	AMITY	BANETOWN	1,469	76	801,271	4,108	42	545	2.80	195
41	RUFF	RUFF CREEK	588	33	214,438	1,485	55	365	2.53	144
42	CALIFORNIA	MALDEN	1,107	90	478,459	3,251	49	432	2.94	147

ATTACHMENT B

Worst Performing Circuits – Remedial Action

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West Penn Power

Rank	Substation	Circuit	Remedial Action Planned or Taken
1	MERRITTSTOWN	BRIER HILL	99% of the CMI for the one-year period occurred during the August 4th to 7th non-excluded storm event. Circuit outage maps were created including a review of outage causes. No additional actions indicated. Monitor reliability outside of storm event.
2	MERRITTSTOWN	REPUBLIC	Circuit review for danger trees completed. Additionally, circuit outage maps were created including a review of outage causes. No additional actions indicated. Monitor reliability outside of storm event.
3	WEST FINLEY	WEST FINLEY	66% of the CMI for the one-year period occurred during the August 4th to 7th non-excluded storm event. Tree trimming planned for 2012. Because this circuit 'only' had 66% CMI due to the August storm, it was further analyzed. Out of the remaining incidents, two locations had 9% of the CMI each. The first had one incident which occurred during a snow storm on 12/09/09, which was also not excluded. The second location was the SS recloser. This location had two comparable outages, both of unknown cause. One of these was on the Subtransmission system feeding the SS. AIM to be completed in 2011.
4	VESTABURG DISTRIBUTION	MEXICO	88% of the CMI for the one-year period occurred during the August 4th to 7th non-excluded storm event. Circuit outage maps were created including a review of outage causes. No additional actions indicated. Monitor reliability outside of storm event.
5	FOOTEDALE	FOOTEDALE	Circuit review for danger trees completed. Additionally, circuit outage maps were created including a review of outage causes. AIM to be completed in 2011. No additional actions indicated.
6	LAGONDA	PROSPERITY	80% of the CMI for the one-year period occurred during the August 4th to 7th non-excluded storm event. Circuit review for danger trees completed. Circuit outage maps were created. No further action anticipated.
7	EAST MILLSBORO	EAST MILLSBORO	Circuit outage maps were created including a review of outage causes. Circuit reviewed for main line hardware issues. Corrective work completed.
8	MARIANNA	TEN MILE	92% of the CMI for the one-year period occurred during the August 4th to 7th non-excluded storm event. Circuit outage maps were created including a review of outage causes. No additional actions indicated. Monitor reliability outside of storm event.
9	MARIANNA	MARIANNA	Circuit outage maps were created including a review of outage causes. Circuit reviewed for main line hardware issues. Corrective work completed. Circuit review for danger trees completed.
10	MERRITTSTOWN	MERRITTSTOWN	Circuit outage maps were created including a review of outage causes. Circuit reviewed for main line hardware issues. Corrective work completed. Circuit review for danger trees complete.
11	MAXWELL	MAXWELL	97% of the CMI for the one-year period occurred during the August 4th to 7th non-excluded storm event. Circuit outage maps were created including a review of outage causes. No additional actions indicated. Monitor reliability outside of storm event.

West Penn Power

Rank	Substation	Circuit	Remedial Action Planned or Taken
12	WATERVILLE	WATERVILLE	Circuit is fed from foreign utility. Alternate supply options limited. Considered distributed generation as alternate feed option (costly). Isolating points and fault indicators added as part of CAIDI improvement program. Circuit reviewed for main line hardware issues. Corrective work completed. AIM work completed. Continue to work with foreign utility to improve reliability.
13	AMITY	AMITY	Circuit outage maps were created including a review of outage causes. Circuit review for danger trees complete.
14	VESTABURG DISTRIBUTION	LOW HILL	70% of the CMI for the one-year period occurred during the August 4th to 7th non-excluded storm event. Circuit outage maps were created including a review of outage causes. Circuits review for danger trees complete. No additional actions indicated.
15	LONG FARM SHAFT	LONG FARM SHAFT	Circuit outage maps were created including a review of outage causes. No additional actions indicated. Monitor reliability outside of storm event.
16	VANCEVILLE	VANCEVILLE	Circuit outage maps were created including a review of outage causes. Circuit review for danger trees complete. No additional actions indicated.
17	NORTH UNION	OLIVER	74% of the CMI for the one-year period occurred during the August 4th to 7th non-excluded storm event. Tree trimming planned for 2012. Circuit outage maps were created including a review of outage causes. No additional actions indicated.
18	DRIFTWOOD	DRIFTWOOD	Circuit reviewed for main line hardware issues. Corrective work completed. Tree trimming to be done in 2011.
19	PANCAKE	STRABANE	Circuit outage maps were created including a review of outage causes. Tree trimming planned for 2011. No additional actions indicated.
20	VESTABURG DISTRIBUTION	FREDERICKTOWN	Circuit outage maps were created including a review of outage causes. Circuit reviewed for main line hardware issues. Corrective work completed. No additional actions indicated.
21	LARDIN	MCCLELLANDTOWN	Circuit review for danger trees complete. Additionally, circuit outage maps were created including a review of outage causes. No additional actions indicated.
22	FOOTEDALE	NEW SALEM	Circuit review for danger trees complete. Additionally, circuit outage maps were created including a review of outage causes. No additional actions indicated.
23	RICHEYVILLE	CENTERVILLE	Circuit outage maps were created including a review of outage causes. Circuit reviewed for main line hardware issues. Corrective work completed. Circuit review for danger trees complete. AIM work to be completed in 2011.
24	PANCAKE	VANCE	82% of the CMI for the one-year period occurred during the August 4th to 7th non-excluded storm event. Circuit outage maps were created including a review of outage causes. 2011 CAIDI PHASE 1 project completed.

West Penn Power			
Rank	Substation	Circuit	Remedial Action Planned or Taken
25	ARENSBURG	ARENSBURG	Circuit outage maps were created including a review of outage causes. Circuit reviewed for main line hardware issues. Corrective work completed.
26	JOURDAN	COMMERCIAL#1	76% of the CMI for the one-year period occurred during the August 4th non-excluded storm event due to an off right-of way tree. Circuit conversion planned from 4 kV to 12 kV. Station reclosers to be added and coordination planned. Circuit outage maps were created including a review of outage causes. No additional actions indicated beyond projects mentioned. Monitor reliability outside of storm event.
27	MANIFOLD	DAVIS SCHOOL	Circuit reviewed for outages and associated causes. A single incident occurred on the circuit during the year during a storm caused by high wind. The circuit performs well otherwise.
28	NORTH UNION	FAN HOLLOW	Circuit outage maps were created including a review of outage causes. Circuit reviewed for main line hardware issues. Corrective work completed
29	GREENSBORO	POLAND	Circuit reviewed for outages and associated causes. One of only two incidents on the circuit for the year caused by high winds impacted reliability. The circuit performs well otherwise.
30	BENTLEYVILLE	ELLSWORTH	Circuit reviewed for main line hardware issues. Corrective work completed
31	RICHEYVILLE	DEEMS	Circuit review for danger trees complete. Additionally, circuit outage maps were created including a review of outage causes. No additional actions indicated.
32	NORMALVILLE	INDIANHEAD	Circuit reviewed for main line hardware issues. Corrective work completed
33	FRAZIER	WICKHAVEN	Circuit outage maps were created including a review of outage causes. Circuit review for danger trees complete. No additional actions indicated.
34	RUTAN	WINDRIDGE	Circuit outage maps were created including a review of outage causes. Circuit reviewed for danger trees. No additional actions indicated. All work planned in 2011.
35	ETHEL SPRINGS	PANDORA	Circuit reviewed for outages and associated causes. Approximately 80% of the annual CMI occurred over 3 days caused by weather/high wind and off right-of-way trees. Outages were minimal outside of this weather event.
36	NORTH UNION	PHILLIPS	Circuit outage maps were created including a review of outage causes. Circuit reviewed for main line hardware issues. Corrective work completed. Circuit reviewed for danger trees - complete.
37	HOUSTON	MONINGER	Circuit reviewed for main line hardware issues. Corrective work completed. Tree trimming completed in 2011
38	BETHELBORO	BUTE	Circuit outage maps were created including a review of outage causes. Circuit reviewed for main line hardware issues. Corrective work completed.
39	SEWICKLEY	WENDEL	Circuit reviewed for outages and associated causes. 81% of the annual CMI occurred on a single day due to off right-of-way tree. The circuit performs well outside of this storm day. Reconductoring project in progress.
40	AMITY	BANETOWN	Circuit review performed with outages review and associated causes. Outages occurring on a storm day accounted for one-half of the annual CMI. Circuit review for danger trees complete.
41	RUFF	RUFF CREEK	Circuit outage maps were created including a review of outage causes. No additional actions indicated beyond planned projects. Monitor reliability outside of storm event.
42	California	Makden	Circuit outage maps were created including a review of outage causes. Circuit reviewed for danger trees. No additional actions indicated.

ATTACHMENT C

West Penn Power's Compliance with Terms of the July 20, 2006
Reliability Settlement Petition

Item	Description	Compliance Status
2a.	<p>Allegheny Power will make adjustments to its vegetation maintenance practices to reduce its rights-of-way clearing cycle to no longer than four years from [2005] through 2008 and will use the four-year cycle results to test the effectiveness of this approach.</p> <p>Allegheny Power reserves the right to change the cycle length after 2008 (after discussing with the parties) if another method with the cycle of more than four years appears more effective at managing its rights of way. Allegheny power will also make adjustments to its existing program to allow more focus on off-right-of-way danger trees.</p>	Commitment completed.
2b.	<p>Allegheny Power will maintain its 12-year inspection cycle for distribution and subtransmission wood poles and overhead facilities in a manner consistent with standard industry practices. These inspections will include visual inspections of the pole, the materials and equipment contained thereon from the ground line to the top of the pole, hammer soundings, borings, excavation and treatment of pole.</p> <p>In addition, Allegheny Power will commit to performing amid-cycle visual inspection of the pole and any material and equipment contained thereon, from the ground line to the pole top, incorporating reliability performance and performance of the materials and equipment into the prioritization of performing the mid-cycle inspections.</p>	Commitment implemented.
2c.	<p>Allegheny Power has committed to undertake a line workforce study that is to determine how many line workers should be hired to proactively prepare for anticipated retirements, to determine the optimal locations for line workers, to determine appropriate work shifts to reduce overtime, and to increase the effectiveness of its operations. Allegheny Power agrees to also study its substation workforce with the goal of estimating future staffing needs, preparing for anticipated retirements, determining the optimal locations and work shifts, and increasing the effectiveness of operations.</p> <p>The line and substation workforce study will be provide to the active parties and Allegheny Power will meet with them to discuss the results of the study.</p>	Commitment completed.
3.	<p>Allegheny Power will provide the Parties copies of all reliability-related reports filed with the PUC under 52 Pa. Code § 57.195 and any additional documents that may be required under 52 Pa. Code § 57.194(h)(1).</p> <p>In addition, as part of its quarterly reliability reports, Allegheny Power will include a section reporting on its compliance with the terms of this settlement.</p>	Commitment completed.
4a. 1-3	<p>Allegheny Power will meet semi-annually with PREA/AEC and local cooperative staff to address reliability and other issues. Meetings will include the following topics:</p> <ol style="list-style-type: none"> 1) Discussion of most recent outages at PREA/AEC delivery points 2) Identification and mutual agreement of Delivery Points that serve critical services/customers (identified as those which directly affect public safety) 3) Discussion of performance on the five "worst performing" Delivery Points, including outage details and determination if corrective action is warranted and development of any appropriate corrective action plan to be completed in a reasonable period of time. 	Commitment implemented.

ADDENDUM

Proposed Changes to Approved and Existing 2011-2012 Biennial Inspection, Maintenance, Repair and Replacement Plan⁹

⁹ The proposed changes and revisions that West Penn Power request herein pertain to distribution overhead line, distribution transformer, recloser, substation and vegetation management inspections.

Section 57.198(l) EDC updates. An EDC may request approval from the Commission for revising its approved plan. An EDC shall submit to the Commission, as an addendum to its quarterly reliability report under §§ 57.193(c) and 57.195, prospective and past revisions to its plan and a discussion of the reasons for the revisions. Within 60 days, the Commission or the Director of CEEP will accept or reject the revisions to the plan. The appeal procedure in subsection (k) applies to the appeal of a rejection of revisions to the plan.

Request for Revision

Pursuant to 52 Pa. Code § 57.198(l), West Penn Power Company ("West Penn Power") hereby requests to modify its current distribution overhead line, distribution transformer, recloser, substation and vegetation management inspection programs. The reason for revision is to implement consistent distribution overhead line, distribution transformer, recloser, substation and vegetation management inspection programs across West Penn Power, Pennsylvania Power Company, Pennsylvania Electric Company and Metropolitan Edison Company following the merger between FirstEnergy and Allegheny Energy. Please see the table below for a summary of the proposed changes. The proposed distribution overhead line, distribution transformer, recloser, substation and vegetation management inspection programs follow on pages 28-42. Upon approval, these pages will replace the pages in the existing approved plans.

West Penn Power	
Distribution Pole Inspections	
<i>Approved Program</i>	<i>Proposed Program</i>
Visual inspection on all poles on 12-year cycle	No change
Distribution Overhead Line Inspections	
Visual inspection on 6-year cycle	Adopt FE program (elimination of AIM program)
Distribution Transformer Inspections	
Overhead transformers – inspected as part of overhead line inspection	Adopt FE program, no change to cycle
Above-ground pad-mounted transformers – inspected on a 5-year cycle	Adopt FE program, change to 6-year cycle to align with overhead transformers and circuits
Below-ground transformers – inspected on 5-year cycle	No more than 8 years
Recloser Inspections	
Inspection done in conjunction with 6-year overhead line inspection. Replacement to occur as soon as practical after inspection	Visually inspect reclosers annually. The annual inspection will consist of counter readings and the field inspection
Substation Inspections	
Inspections consist of two components: 1) Monthly Safety & Security 2) Six Month Reading and Open Cabinet Visual Inspection	Inspections will consist of three components: 1. Monthly Safety & Security Inspection 2. Quarterly Safety and Security Inspection with Readings 3. Every Six Months Safety and Security Inspection with Full Inspection
Vegetation Management	

<p>Program based on conditional assessment of tree trimming needs. The extent of the vegetation work to be performed on a given section of a scheduled circuit is determined by the reliability impact of that section of line.</p> <p>Urban circuits – vegetation work is performed on a 4-year cycle to maintain reliability in heavily populated areas and to reduce adverse impact of excessive trimming of urban areas.</p> <p>Rural circuits – prioritized based on CMI, number of customers on the circuit and time since circuit last trimmed. At no time will a rural circuit go more than 8 years without having vegetation conditions addressed.</p>	<p>Standard specification – prune to achieve 5 years of clearance.</p> <p>Portions of a circuit that experience high customer interruption minutes due to tree-caused outages may be targeted to receive the Standard Specification as well as enhanced removal techniques.</p> <p>A proactive Inspect/Maintain process will be utilized for portions of a circuit that have not experienced significant reliability issues – this may include extension of a cycle which will not exceed 8 years.</p>
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Section 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.*

Program Description

West Penn Power performs vegetation management to help ensure the continued safe and reliable operation of the distribution system. The Standard Specification for vegetation management is designed to support line reliability, maintain access, make repairs, or restore service and to support safe and reliable service. The Standard vegetation specification provides vegetation to be pruned to achieve five (5) years of clearance, removal of selected incompatible trees within the clearing zone corridor, removal of certain defective limbs that are overhanging primary conductors, controlling selected incompatible brush mechanically and/or using herbicide, and removal of off-corridor priority trees that are dead, dying, diseased, and leaning or significantly encroaching the corridor.

Portions of a circuit that experience high customer interruption minutes due to vegetation-caused outages may be targeted to receive the Standard Specification as well as enhanced vegetation removal techniques, which includes removal of certain healthy limbs, based on tree species and condition, which overhang primary conductors.

For portions of a circuit that have not experienced significant reliability issues due to vegetation-caused outages, a proactive Inspect/Maintain process will target selective vegetation removal for continued reliable system operation. This may include the extension of a cycle which will not exceed eight (8) years. This process involves inspection of the vegetation to evaluate the extent of potential for vegetation to interfere with energized conductors. Factors to consider in the evaluation are the voltage and height of the conductor, the type of tree, its growth rate and branching habit. Trees that will impact safety or reliability will be maintained to the Standard Specification.

Methods used to manage and control vegetation include manual control methods using hand-operated tools, mechanical control using equipment mounted saws, mowers or other devices, and various herbicide application techniques such as, selective basal herbicide applications, stem foliage applications and cut stubble applications.

Further detailed information regarding West Penn Power's vegetation management program may be found in FirstEnergy's [Vegetation Management Program Description](#)

Inspection Plan

	Area	Inspections and Treatments Planned
		Total Circuit Miles 2012
West Penn Power 4,514 total circuit miles	Arnold	292
	Boyce	115
	Butler	301
	Charleroi	416
	Clarion	188
	Hyndman	45
	Jeannette	252
	Jefferson	435
	Kittanning	113
	Latrobe	243
	McConnellsburg	184
	McDonald	169
	Pleasant Valley	196
	St Marys	254
	State College	342
	Uniontown	324
Washington	395	
Waynesboro	269	

Section 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 that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Justification

Distribution vegetation management activities are performed in accordance with the following:

- Generally accepted industry practices
- All routine vegetation clearing work is performed in compliance with ANSI Z133.1 and A-300 Standards and according to the requirements given by OSHA and the National Electrical Safety Code (NESC)

West Penn Power intends to implement the Vegetation Management program methods (excluding the cycle) currently used by Pennsylvania Power Company ("Penn Power"), Pennsylvania Electric Company ("Penelec") and Metropolitan Edison Company ("Met-Ed") on a five-year cycle. West Penn Power's new Vegetation Management program will be completing 100% of the entire service territory within a five-year cycle compared to the present plan which completes the entire service territory within an eight-year cycle. As shown later in this filing West Penn Power will prioritize the first zone of trimming, which is from the substation to the first protection device. Also, West Penn Power will be implementing a heavier trim practice with more ground to sky trimming and removal of danger trees. The funding of the West Penn Power's Forestry Management program has increased significantly, as shown later in this filing, with over a 200% increase in funding from 2010 to 2011. We plan to commit to an increased level of spending over the next several years that will improve the reliability of the West Penn Power electrical system. Historically, West Penn Power's vegetation management program was a condition-based assessment of tree trimming needs. The extent of the vegetation work performed on a given section of a circuit was determined by the reliability impact of that section of line. Urban circuits (areas within cities, towns and boroughs) had vegetation work performed on a four-year cycle to maintain reliability in heavily populated areas and to reduce adverse impact of excessive trimming in these areas. Rural circuits (non-urban) were trimmed on an eight-year cycle and prioritized based on Customer Minutes of Interruption (CMI), the number of customers on the circuit, and the amount of time since the circuit was last trimmed.

The following table shows the West Penn Power mileage that would be trimmed each year based on the currently-approved program. As shown in the table, under the current program, it would take eight years for West Penn Power to conduct vegetation management on 100% of its circuits.

		Currently Approved Program (4-year urban + 8-year rural)					
		Urban		Rural		Total	
Cycle	Year	Cumulative	% of Total	Cumulative	% of Total	Cumulative	% of Total
1	2012	1,051	25%	1,950	13%	3,000	15%
2	2013	2,101	50%	3,900	25%	6,001	30%
3	2014	3,152	75%	5,849	38%	9,001	45%
4	2015	4,202	100%	7,799	50%	12,001	61%
5	2016	5,253	125%	9,749	63%	15,001	76%
6	2017	6,303	150%	11,699	75%	18,002	91%
7	2018	7,354	175%	13,648	88%	21,002	106%
8	2019	8,404	200%	15,598	100%	24,002	121%
Total System Miles		4,202		15,598		19,800	

Pursuant to the proposed Plan, West Penn Power's revised vegetation management program will allow for prioritization of the first zone of trimming, which is from the substation to the first protective device. The table below shows the West Penn Power mileage that would be trimmed each year under the proposed five-year program. Under this Plan, as shown in the following table, West Penn Power plans to complete 100% of the Zone 1 trim area within the first three years. Under the revised program, 100% of all miles will be trimmed within five years.

Proposed 5-Year Cycle					
		Zone 1 (Substation to first protective device)		Total	
Cycle Year	Year	Cumulative Cycle Miles	% of Total	Cumulative Cycle Miles	% of Total
1	2012	678	49%	4,360	22%
2	2013	1,155	83%	8,520	43%
3	2014	1,433	103%	12,480	63%
4	2015	1,710	123%	16,440	83%
5	2016	1,988	143%	20,400	103%
Total System Miles		1,388		19,800	

Finally, as highlighted below and as part of the proposed change to its vegetation management program, West Penn Power estimates spending approximately \$25.3 million on its vegetation management program in 2012. This is an increase of approximately \$4 million over the 2011 projected spend and an increase of \$18.2 million over the 2010 actual vegetation management spend. The investment in West Penn Power's vegetation management program is expected to be maintained at a consistent level for the next five years.

Year	Vegetation Management Annual Trim Program
2012 Projected	\$25,372,758.00
2011 Estimate	\$21,325,410.00
2010 Actual	\$7,113,207.00
2009 Actual	\$5,429,865.00
2008 Actual	\$6,708,940.67
2007 Actual	\$4,976,665.19

Section 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 distribution line*
- iii. *Other conditions that may adversely affect operation of the overhead distribution line*

Program Description

West Penn Power shall visually inspect overhead lines and equipment on a six-year cycle. The purpose for inspecting overhead lines and equipment is to identify and repair unsafe conditions or conditions that may adversely affect service reliability, and to comply with the state regulatory agencies and the National Electrical Safety Code. This program shall be limited to overhead facilities.

Approximately one-sixth of all circuits will be inspected annually to levelize labor commitments and expenses. This preventative maintenance will consist of a visual inspection and recording of abnormal conditions including but not limited to the following types of overhead circuit equipment:

- Conductors (wire and cable) – excessive slack, condition, damage, clearances
- Supporting structures (wood poles) – deteriorated condition, sustained damage (lightning, vehicle, woodpecker holes)
- Pole hardware (including insulators) – condition, damage
- Guying – condition, damage
- Pole-mounted distribution equipment (including overhead transformers) – condition, damage

Further information regarding West Penn Power's inspection of Distribution Overhead Lines may be found in the Distribution Inspection & Maintenance Practice – Overhead Circuits and Equipment.

Section 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.*

Corrective Maintenance

Supporting structures with recorded defects that West Penn Power could reasonably expect to affect the integrity of the circuits shall be repaired/replaced within 30 days. All remaining deficiencies will be prioritized on a case-by-case basis.

Section 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 that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Section 57.198(n)(6). Distribution transformer inspections. 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

Program Description

West Penn Power inspects overhead distribution transformers as part of the overhead line inspection. Above-ground pad-mounted transformers are inspected on a six-year cycle and below-ground transformers are inspected on an eight-year cycle. The purpose for inspecting distribution transformers is to identify and repair unsafe conditions or conditions that may adversely affect service reliability, and to comply with the state regulatory agencies and the National Electrical Safety Code.

Overhead distribution transformers – visual inspection and recording of abnormal conditions including but not limited to the following:

- Equipment condition – oil leakage, arresters, rust, dents or evidence of contact

Above-ground pad-mounted equipment (transformers and switchgear) – inspection and recording of abnormal conditions including but not limited to the following:

- Equipment condition – oil leakage, cabinet damage, holes, washout
- Security – locking mechanisms
- Accessibility – as required for operation and maintenance purposes, including the installation of fences or shrubbery that could adversely affect access to and operation of the transformer and unauthorized excavation or changes in grade near the transformer
- Warning labels – electrical hazard warning label and landscaping instructions notice

Below-ground transformers – visual inspection and recording of abnormal conditions including but not limited to the following:

- Accessibility – verify cover is secured
- Equipment condition – visually inspect baffle

Further detailed information regarding West Penn Power's inspection of distribution transformers may be found in the [Distribution Inspection & Maintenance Practice – Underground Equipment](#).

Inspection Plan

	Area	Type	Transformer Inspections Planned (Total Transformers)
			2012
West Penn Power 40,317 total UG transformers 270,523 total OH transformers	Arnold	Overhead Transformers 23,833 total transformers	
		Above-Ground Pad-mounted 2,242 total transformers	374
	Boyce	Overhead Transformers 9,728 total transformers	
		Above-Ground Pad-mounted 3,828 total transformers	638
	Butler	Overhead Transformers 20,003 total transformers	
		Above-Ground Pad-mounted 3,759 total transformers	627
	Charleroi	Overhead Transformers 28,106 total transformers	
		Above-Ground Pad-mounted 2,844 total transformers	474
	Clarion	Overhead Transformers 5,566 total transformers	
		Above-Ground Pad-mounted 608 total transformers	101
	Hyndman	Overhead Transformers 2,565 total transformers	
		Above-Ground Pad-mounted 206 total transformers	34
	Jeannette	Overhead Transformers 25,636 transformers	
		Above-Ground Pad-mounted 4,948 total transformers	825
	Jefferson	Overhead Transformers 13,982 total transformers	
		Above-Ground Pad-mounted 619 total transformers	103
	Kittanning	Overhead Transformers 10,091 total transformers	
		Above-Ground Pad-mounted 742 total transformers	124
Latrobe	Overhead Transformers 17,090 total transformers		
	Above-Ground Pad-mounted 2,200 total transformers	367	

	Area	Type	Transformer Inspections Planned
			(Total Transformers) 2012
West Penn Power 40,317 total UG transformers 270,523 total OH transformers	McConnellsburg	Overhead Transformers 7,193 total transformers	
		Above-Ground Pad-mounted 762 total transformers	127
	McDonald	Overhead Transformers 7,337 total transformers	
		Above-Ground Pad-mounted 1,167 total transformers	194
	Pleasant Valley	Overhead Transformers 15,913 total transformers	
		Above-Ground Pad-mounted 1,381 total transformers	230
	St. Marys	Overhead Transformers 14,277 total transformers	
		Above-Ground Pad-mounted 956 total transformers	159
	State College	Overhead Transformers 18,686 total transformers	
		Above-Ground Pad-mounted 5,381 total transformers	897
	Uniontown	Overhead Transformers 18,747 total transformers	
		Above-Ground Pad-mounted 1,692 total transformers	282
	Washington	Overhead Transformers 16,691 total transformers	
		Above-Ground Pad-mounted 2,279 total transformers	380
	Waynesboro	Overhead Transformers 15,029 total transformers	
		Above-Ground Pad-mounted 4,703 total transformers	784

Section 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 that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.

Justification

The practice of performing distribution overhead transformer as well as above-ground transformers on a six-year cycle and below-ground transformers on an eight-year cycle is based on accepted electric utility practices and the experience of West Penn Power. National Electrical Safety Code (NESC) Rule 12.121.A states "lines and equipment shall be inspected at such intervals as experience has shown to be necessary."

The aforementioned periodicity between inspections allows distribution overhead and above-ground transformers to be inspected in conjunction with the overhead circuit inspection which is on a 6-year cycle as well. The above periodicities between inspections have proven to be successful in addressing emergent problems in a timely manner, allowing for proper planning and remediation prior to the emergent problem having a negative impact on personal safety, equipment integrity or service reliability.

Section 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.*

Program Description

West Penn Power visually inspects distribution line reclosers annually. 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 state regulatory agencies and the National Electrical Safety Code.

The annual preventative maintenance consists of counter readings and the field inspection. The counter readings are obtained to assess system performance based on the number of operations. The field inspection includes but is not limited to the following:

- Type of recloser and current rating
- Counter reading
- Condition – rust, dents, physical damage, leaks, lightning damage
- Equipment – surge arresters, tank-ground connections, by-pass switches, control battery, pole
- Grounds – damage, condition

Further detailed information regarding West Penn Power's inspection of reclosers may be found in the Distribution Inspection & Maintenance Practice – Line Reclosers.

Inspection Plan

	Area	Recloser Inspections Planned
		Total Number of Reclosers 2012
West Penn Power <i>3780 total reclosers</i>	Arnold <i>312 total reclosers</i>	312
	Boyce <i>268 total reclosers</i>	268
	Butler <i>324 total reclosers</i>	324
	Charleroi <i>273 total reclosers</i>	273
	Clarion <i>76 total reclosers</i>	76
	Hyndman <i>64 total reclosers</i>	64
	Jeannette <i>326 total reclosers</i>	326
	Jefferson <i>188 total reclosers</i>	188
	Kittanning <i>133 total reclosers</i>	133
	Latrobe <i>210 total reclosers</i>	210
	McConnellsburg <i>154 total reclosers</i>	154
	McDonald <i>163 total reclosers</i>	163
	Pleasant Valley <i>154 total reclosers</i>	154
	St. Marys <i>148 total reclosers</i>	148
	State College <i>165 total reclosers</i>	165
	Uniontown <i>225 total reclosers</i>	225
Washington <i>281 total reclosers</i>	281	
Waynesboro <i>316 total reclosers</i>	316	

Section 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 that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Justification

The practice of performing annual recloser inspections is based on accepted electric utility practices and the experience of West Penn Power. National Electrical Safety Code (NESC) Rule 12.121.A states *"lines and equipment shall be inspected at such intervals as experience has shown to be necessary."* A periodicity of one year between inspections has proven to be successful in addressing emergent problems in a timely manner, allowing for proper planning and remediation prior to the emergent problem having a negative impact on personal safety, equipment integrity or service reliability.

The aforementioned practice is a Pennsylvania Power Company, Pennsylvania Electric Company and Metropolitan Edison Company program that is being adopted by West Penn Power as a result of the merger between Allegheny Energy and FirstEnergy Corp.

Section 57.198(n)(8). Substation inspections. *Substation equipment, structures and hardware shall be inspected on a cycle of 5 weeks or less.*

Program Description

West Penn Power's substation inspection program consists of three components: monthly, quarterly and biannual inspections (Class C, B and A respectively). The purpose of these inspections is to verify the security of the substation, capture readings and to ensure that any developing substation problems are identified and addressed in a timely manner in support of system reliability and electrical safety.

These three components include:

1. Safety and Security Inspection (Class C) – monthly inspection and recording of abnormal conditions including but not limited to the following:
 - Substation control house (security breaches, roof integrity, fire protection equipment, general housekeeping)
 - Substation yard and perimeter (gate, fence, signage)
2. Safety and Security Inspection with Readings (Class B) – quarterly inspection and recording of abnormal conditions including but not limited to the following types of substation equipment:
 - Substation control house (security breaches, roof integrity, fire protection equipment, general housekeeping)
 - Substation yard and perimeter (gate, fence, signage)
 - Read and record currents, voltages, temperatures, pressures and operations counters on installed substation equipment
3. Safety and Security Inspection with Full Inspection (Class A) – a biannual visual inspection along with readings and a more comprehensive inspection and testing of the substation and including but not limited to the following types of substation equipment:
 - Substation control house (security breaches, roof integrity, fire protection equipment, general housekeeping)
 - Substation yard and perimeter (gate, fence, signage)
 - Read and record currents, voltages, temperatures, pressures and operations counters on installed substation equipment
 - Microwave/radio sites and engine generators, batteries and chargers
 - Relaying, power transformers, breakers, voltage regulators, capacitor banks, etc.

Further detailed information regarding West Penn Power's inspection of substations may be found in the [Substation Patrol Inspections Manual](#).

Inspection Plan

	Area	Substation Inspections Planned
		Number of Substations 2012
West Penn Power <i>510 total-substations</i>	Arnold <i>53 substations</i>	636
	Boyce <i>21 substations</i>	252
	Butler <i>43 substations</i>	516
	Charleroi <i>48 substations</i>	576
	Cumberland <i>3 substations</i>	36
	Jeannette <i>29 substations</i>	87
	Jefferson <i>60 substations</i>	720
	Kittanning <i>28 substations</i>	336
	Latrobe <i>29 substations</i>	348
	Pleasant Valley <i>50 substations</i>	600
	St. Marys <i>40 substations</i>	480
	State College <i>37 substations</i>	444
	Washington <i>34 substations</i>	408
Waynesboro <i>35 substations</i>	420	

Section 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 that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Justification

The practice of performing substation inspections is based on accepted utility practices and the experience of West Penn Power. Providing a trained, physical presence within the substation on a regular, periodic basis has proven very successful in detecting the degradation of facilities not always captured by existing local and remote surveillance and monitoring tools. A periodicity of one month between inspections has proven to be successful in addressing emergent problems in a timely manner, allowing for proper planning and remediation prior to the emergent problem having a negative impact on person safety, equipment integrity or service reliability.

The aforementioned practice is a Pennsylvania Power Company, Pennsylvania Electric Company and Metropolitan Edison Company program that is being adopted by West Penn Power as a result of the merger between Allegheny Energy and FirstEnergy Corp.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

3rd Quarter 2011 Reliability Report – West :
Penn Power Company - Pursuant to 52 Pa. :
Code § 57.195(d) and (e)

NOV -1 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by overnight United Parcel Service, as follows:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
Office of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101
Scott J. Rubin, Esquire
Utility Workers Union of America
333 Oak Lane
Bloomsburg, PA 17815

Office of the Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

David J. Dulick
Pennsylvania Rural Electric Assn.
212 Locust Street, 2nd Floor
Harrisburg, PA 17101


Service by electronic mail, as follows:

Darren Gill
Blaine Loper
Bureau of Conservation, Economics & Energy
Planning
Pennsylvania Public Utility Commission
dgill@state.pa.us
bloper@state.pa.us

Dan Searfoorce
Bureau of Fixed Utility Services
Pennsylvania Public Utility Commission
dsearfoorc@state.pa.us

Dated: November 1, 2011

Original Signed:


Lori B. Barman
FirstEnergy Service Company
76 S. Main Street
Akron, OH 44308
(330) 252-6380
lbarman@firstenergycorp.com

B BARMAN
252-6380
SERVICE COMPANY
DOUTH MAIN
DN OH 44308

1 LBS

1 OF 1

IP TO:

ROSEMARY CHIAVETTA, SECRETARY

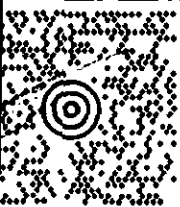
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PENNSYLVANIA PUBLIC UTILITIES COMMI

COMMONWEALTH KEYSTONE BUILDING

400 NORTH STREET, 2ND FLOOR

HARRISBURG PA 17120



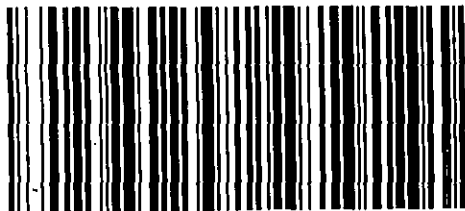
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PS NEXT DAY AIR

PACKING #: 1Z 475 886 01 9904 6017

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