

ROBERT M. TOMLINSON
6TH DISTRICT

2571

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Senate of Pennsylvania

May 14, 2007

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2007 MAY 16 PM 3:39
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James J. McNulty, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: PUC Proposed Regulation – Inspection and Maintenance Standards for the Electric Distribution Companies, PUC Docket Number: L-00040167, IRRC #57-248 (#2571)

Dear Mr. McNulty:

Recently my staff met with the staff of the PUC Law Bureau to discuss the above referenced regulation. In reviewing the comments, part of the concern was evidence by the utility industry that these regulations would bring additional cost of 75 million dollars that would be assessed on the ratepayer. The discussion provided little relationship between the cost and the direct benefit to reliability being sought with the proposal of the regulation. Requiring two men to walk a transmission line, or aerial overviews of lines appears to be cost prohibitive and unduly burdensome.

I would urge the Commission to consider revision of its standards and mandated time cycles. To take the regulation from no mandated cycles to highly restrictive standards seems too restrictive.

There is general agreement that companies should file its inspection and maintenance plans. However even the LBFC study of June 2002 on reliability, would not recommend that the PUC “adopt detailed and specific standards because all systems are not the same.” The audit recommended an approach similar to Illinois where detailed documentation on programs are submitted. This appears to be a better reasoned approach. The regulations need to provide flexibility for EDCs to create the appropriate programs and integrate advances in technology into future inspection and maintenance plans.

The Commission has already demonstrated that companies not meeting the reliability benchmarks can be ordered to improve reliability. I urge you to avoid the creation of reports and additional bureaucracy without good purpose.

Sincerely,



Robert M. Tomlinson
State Senator, 6th District

cc: Hon. Wendell Holland, Chairman
Hon. James H. Cawley, Vice Chairman
Hon. Terrance J. Fitzpatrick
Hon. Kim Pizzingrilli
✓ Kim Kaufman, Executive Director, IRRC