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**Representative Joseph Preston, Jr.  
Pennsylvania House of Representatives**

Room 332 Irvis Office Building  
PO Box 202024  
Harrisburg, Pennsylvania 17120-2024  
PHONE: (717) 783-1017  
FAX: (717) 787-7520  
E-MAIL: [jpreston@pahouse.net](mailto:jpreston@pahouse.net)



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Legislative District Office  
603 Penn Avenue  
Pittsburgh, Pennsylvania 15206-4005  
PHONE: (412) 361-3692  
FAX: (412) 665-5501

**HOUSE OF REPRESENTATIVES  
COMMONWEALTH OF PENNSYLVANIA**

May 24, 2007

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

RECEIVED  
2007 MAY 29 AM 10:06  
INDEPENDENT REGULATOR  
PENNSYLVANIA  
PUBLIC UTILITIES COMMISSION

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:

I am requesting the Commission revise above mentioned proposed regulations by removing prescriptive standards time cycles and eliminate the automatic rejection of plans that do not have mandated time cycles. Requesting each company file their inspection and maintenance plans will fulfill any mandate under the Electricity Generation Customer Choice (Act 66 Pa. C.S. Chapter 28). These changes will provide the flexibility for EDC's to determine the appropriate programs and ingrate advances in technology.

This proposal contains prescriptive Inspection and Maintenance Standards which should not be mandated since the electric distribution companies (EDC's) already must follow regulations that are required to meet reliability standards. The existing regulations already require reporting to the PUC under 52 PA Code §57.195 Inspection and Maintenance goals for transmission, substation and distribution. In addition the actual results of inspection and maintenance practices are reported along with the expenditures. The PUC proposed regulations on implementing additional Inspection and Maintenance Standards, which are estimated to cost \$75.3 million with no proven increase in electricity reliability, is not necessary.

The Commission has already proven that companies not meeting the reliability indices/benchmarks can be ordered to improve their reliability. There is no need to mandate

additional prescriptive standards at considerable cost if the utilities are presently meeting their reliability indices/benchmarks.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joseph Preston Jr.", written in black ink.

Joseph Preston Jr.

JP/mls

CC: Honorable Wendell Holland, Chairman  
Honorable James H. Cawley, Vice Chairman  
Honorable Terrance J. Fitzpatrick, Commissioner  
Honorable Kim Pizzingrilli, Commissioner  
Mr. Kim Kaufman, Executive Director