



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

February 1, 2012

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

L-00030161

Re: 4th Quarter 2011 Reliability Report – West Penn Power Company - Pursuant to
52 Pa. Code §57.195(d) and (e)

Dear Secretary Chiavetta:

Enclosed for filing on behalf of West Penn Power Company is an original and seven (7) copies of the 4th Quarter 2011 Reliability Report, pursuant to 52 Pa. Code §57.195(d) and (e). Please date-stamp the additional copy and return it in the enclosed postage-paid, addressed envelope for our file.

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

RECEIVED

Sincerely,

FEB 01 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Douglas S. Elliott
President, Pennsylvania Operations
(610) 921-6060
elliottd@firstenergycorp.com

Eric J. Dickson
Director, Operations Services
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FEB 01 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

2011 4th Quarter Reliability Report

West Penn Power Company

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

4th Quarter 2011 Reliability Report – West Penn Power Company

The following 4th Quarter 2011 Reliability Report is filed on behalf of West Penn Power Company (“West Penn Power”) for the period ending December 31, 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 December 31, 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

4Q 2011 (12-Mo Rolling)	West Penn Power		
	Benchmark	12-Month Standard	12-Month Actual
SAIFI	1.05	1.26	1.40 ¹
CAIDI	170	204	151
SAIDI	179	257	211
Customers Served ²	715,738		
Number of Sustained Interruptions	19,924		
Customers Affected	999,988		
Customer Minutes	151,157,755		

West Penn Power results for 4th Quarter 2011 are:

West Penn Power	
CAIDI	26% better than Commission's 12-Month Standard 11% better than Commission's Benchmark
SAIDI	18% better than Commission's 12-Month Standard

Note: West Penn Power has communicated the Company's intention to transition to the PowerOn Outage Management System in the second quarter 2012.

¹ West Penn Power's higher-than-normal SAIFI is directly attributed to several non-excludable storm events predominantly during the spring months as well as July and October. In 2011, 38% of West Penn Power's customers interrupted were attributable to non-excludable events as compared to 23% for the prior five year average.

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				
4th 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	59,711,813	5,305	260,406	27%
Weather	30,040,467	2,682	161,875	13%
Unknown	14,458,608	2,102	110,080	11%
Overhead Material	8,753,886	1,976	96,239	10%
Public	10,892,911	1,599	122,567	8%
Overhead Equipment	3,331,940	1,545	32,067	8%
Animals	2,318,530	1,422	31,284	7%
Overhead Wire	6,777,961	1,180	63,576	6%
On Right-of-Way Trees	7,777,797	1,038	53,813	5%
Underground Cable	1,830,441	533	9,733	3%
Other	1,698,854	252	22,555	1%
Substation Equipment	3,043,286	129	32,283	1%
Underground Equipment	449,727	119	2,946	1%
Underground Material	38,210	26	292	0%
Service Equipment	33,322	16	272	0%
TOTAL	151,157,755	19,924	999,988	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 also 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 638 miles of mainline feeder on 143 distribution circuits identified as having the worst performance from tree-caused lockouts. This program was completed at 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 were scheduled based on a predetermined formula which factors in time since last trimmed, tree related customer minutes of interruption ("CMI") over at least three years, and the number of customers on the circuit. Rural circuits with the worst cumulative ranking were made highest priority in 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.

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

Information is not required for the 4th Quarter report.

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 Expenditures

Information is not required for the 4th Quarter report.

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 Expenditures

Information is not required for the 4th Quarter report.

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	85
	Lineman	179	176	175	174
Substation	Leader	14	14	14	14
	Electrician	47	51	51	46
	Total	328	327	326	319

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	1,044,192	3,603,514

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%
October	25%
November	32%
December	27%

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)
October	1,045	805	3,594	5.19	4.46
November	724	622	2,734	4.90	4.40
December	622	489	2,051	4.65	4.19
4Q Total	2,391	1,916	8,379	4.91	4.35

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	27	99,593	820	67	235	1.93	121
2	MERRITTSTOWN	REPUBLIC	1,626	23	559,271	1,597	57	344	0.98	350
3	WEST FINLEY	WEST FINLEY	131	18	46,303	317	56	353	2.42	146
4	VESTABURG DISTRIBUTION	MEXICO	592	19	66,265	727	80	112	1.23	91
5	FOOTEDALE	FOOTEDALE	1,212	25	72,833	829	87	60	0.68	88
6	LAGONDA	PROSPERITY	480	51	346,660	1,251	31	722	2.60	277
7	EAST MILLSBORO	EAST MILLSBORO	171	55	356,233	1,642	-83	2,083	9.60	217
8	MARIANNA	TEN MILE	349	43	449,420	1,694	-12	1,286	4.85	265
9	MARIANNA	MARIANNA	752	51	102,694	994	77	137	1.32	103
10	MERRITTSTOWN	MERRITTSTOWN	860	6	29,310	398	91	34	0.46	74
11	MAXWELL	MAXWELL	206	8	60,254	229	63	292	1.11	263
12	WATERVILLE	WATERVILLE	355	58	982,390	4,066	-131	2,766	11.45	242
13	AMITY	AMITY	516	37	358,372	1,557	32	694	3.02	230
14	VESTABURG DISTRIBUTION	LOW HILL	704	33	124,076	905	74	176	1.29	137
15	LONG FARM SHAFT	LONG FARM SHAFT	123	4	18,892	143	76	154	1.16	132
16	VANCEVILLE	VANCEVILLE	1,351	119	491,520	3,103	56	364	2.30	158
17	NORTH UNION	OLVER	758	58	276,431	2,507	51	365	3.31	110
18	DRIFTWOOD	DRIFTWOOD	973	147	2,303,993	4,912	-74	2,368	5.05	469
19	PANCAKE	STRABANE	324	5	707	9	95	2	0.03	79
20	VESTABURG DISTRIBUTION	FREDERICKTOWN	844	18	155,410	1,004	73	184	1.19	155
21	LARDIN	MCCLELLANDTOWN	562	30	139,861	1,503	62	249	2.67	93
22	FOOTEDALE	NEW SALEM	1,052	17	32,999	484	91	31	0.46	68
23	RICHEYVILLE	CENTERVILLE	931	27	370,771	2,156	54	398	2.32	172
24	PANCAKE	VANCE	385	12	6,292	43	90	16	0.11	146
25	ARENSBURG	ARENSBURG	135	7	21,244	147	76	157	1.09	145
26	JOURDAN	COMMERCIAL#1	312	3	22,776	312	85	73	1.00	73
27	MANFOLD	DAVIS SCHOOL	164	8	10,720	330	79	65	2.01	32
28	NORTH UNION	FAN HOLLOW	576	11	50,766	154	75	88	0.27	330
29	GREENSBORO	POLAND	153	6	41,174	160	65	269	1.05	257
30	BENTLEYVILLE	ELLSWORTH	2,048	66	1,580,645	7,732	23	772	3.78	204

West Penn Power										
Circuit Rank	Substation	Circuit Desc	Average Customers	Outages	Customer Minutes	Customers Affected	DCII	SAIDI	SAIFI	CAIDI
31	RICHEYVILLE	DEEMS	349	3	6,494	42	90	19	0.12	155
32	NORMALVILLE	INDIANHEAD	572	16	598,836	649	-8	1,047	1.13	923
33	FRAZIER	WICKHAVEN	737	44	195,086	540	62	265	0.73	361
34	RUTAN	WINDRIDGE	1,187	92	782,974	5,579	24	660	4.70	140
35	ETHEL SPRINGS	PANDORA	1,391	43	1,267,215	1,239	-5	911	0.89	1,023
36	NORTH UNION	PHILLIPS	1,439	82	235,385	1,724	75	164	1.20	137
37	HOUSTON	MONINGER	929	14	450,315	2,070	48	485	2.23	218
38	BETHELBORO	BUTE	514	11	19,908	115	87	39	0.22	173
39	SEWICKLEY	WENDEL	739	68	946,105	2,221	-6	1,279	3.00	426
40	AMITY	BANETOWN	1,471	86	1,280,234	7,499	10	870	5.10	171
41	RUFF	RUFF CREEK	589	32	158,652	1,172	64	269	1.99	135
42	CALIFORNIA	MALDEN	1,116	79	303,905	2,838	61	272	2.54	107

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 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 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. All 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. Circuit 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	OLVER	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 completed in 2011
19	PANCAKE	STRABANE	Circuit outage maps were created including a review of outage causes. Tree trimming completed in 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. All work 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.
25	ARENSBURG	ARENSBURG	Circuit outage maps were created including a review of outage causes. Circuit reviewed for main line hardware issues. Corrective work completed.

West Penn Power			
Rank	Substation	Circuit	Remedial Action Planned or Taken
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	MANFOLD	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. AM work completed 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.

West Penn Power			
Rank	Substation	Circuit	Remedial Action Planned or Taken
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	Malden	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. 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. 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 <i>section reporting on its compliance with the terms of this settlement.</i></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.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**4th Quarter 2011 Reliability Report – West :
Penn Power Company - Pursuant to 52 Pa. :
Code § 57.195(d) and (e)**

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
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Dated: February 1, 2012

Original Signed:

 PA PUBLIC UTILITY COMMISSION
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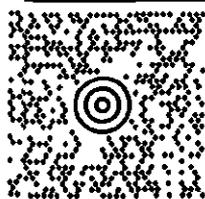


SHIP TO:

ROSEMARY CHIAVETTA, SECRETARY
7177727777
PENNSYLVANIA PUBLIC UTILITIES COMMISSION
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PUBLIC UTILITY COMMISSION
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Agency: P
Floor:
External

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