

FirstEnergy.

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

November 13, 2012

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA UNITED PARCEL SERVICE

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

L-00030161

Re: 3rd Quarter 2012 Reliability Report – West Penn Power Company

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code § 57.195(d) and (e), enclosed for filing on behalf of West Penn Power Company ("Company") are two copies of the 3rd Quarter 2012 Reliability Report ("Report"). Please date stamp the additional copy and return it in the postage-prepaid envelope provided.

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

Sincerely,



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



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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

2012 3rd Quarter Reliability Report

West Penn Power Company

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

3rd Quarter 2012 Reliability Report - West Penn Power Company

The following 3rd Quarter 2012 Reliability Report is filed on behalf of West Penn Power Company ("West Penn Power") for the period ending September 30, 2012.

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

FirstEnergy Company	Customers Affected	Time and Duration of the Event		Cause of the Event	Commission Approval Status
West Penn Power	80,438	Duration	4 days, 12 hours and 29 minutes	Severe thunderstorms	Approved on October 25, 2012
		Start Date/Time	July 26, 2012 4:26am		
		End Date/Time	July 30, 2012 4:55pm		

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 2012 (12-Mo Rolling)	West Penn Power		
	Benchmark	12-Month Standard	12-Month Actual
SAIFI	1.05	1.26	1.09
CAIDI	170	204	211 ¹
SAIDI	179	257	231 ¹
Customers Served ²	704,519		
Number of Sustained Interruptions	10,873		
Customers Affected	769,916		
Customer Minutes	162,644,608		

¹ West Penn Power's higher-than-normal CAIDI and SAIDI are directly attributed to the non-excludable event, Derecho which occurred in June 2012. This event impacted 59,107 customers and resulted in an increase of 65 minutes SAIDI and an increase of 31 minutes of CAIDI.

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

The methodology used to identify worst performing circuits is based on both System Average Interruption Frequency Index (“SAIFI”) and System Average Interruption Duration Index (“SAIDI”). The methodology consists of the following steps:

1. For each circuit calculate a circuit SAIFI using only distribution-caused outages.
2. Select the worst 20% of circuits based on the highest circuit SAIFI.
3. Rank the selected circuits based on SAIDI using only distribution-caused customer minutes.
4. Select 5% of the circuits based on the highest customer minutes. These circuits are then identified as the worst performing circuits.

West Penn Power’s ranking of the 5% Worst Performing Circuits are provided in Attachment A to 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 to 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 2012 12-Month Rolling	West Penn Power			
Cause	Customer Minutes	Number of Sustained Interruptions	Customers Affected	% Based on Number of Outages
EQUIPMENT FAILURE	25,099,381	2635	147,681	24.23%
TREES/NOT PREVENTABLE	68,121,682	2448	187,529	22.51%
UNKNOWN	19,523,598	1953	115,174	17.96%
ANIMAL	2,111,556	985	22389	9.06%
LINE FAILURE	8,677,705	668	57304	6.14%
FORCED OUTAGE	2,899,707	497	44,374	4.57%
TREES/PREVENTABLE	6,071,377	421	28,223	3.87%
VEHICLE	8,908,365	359	82,662	3.30%
WIND	14,758,305	244	29,713	2.24%
LIGHTNING	2,417,987	232	12378	2.13%
BIRD	214,230	120	2398	1.10%
HUMAN ERROR - NON-COMPANY	1,361,467	89	12,448	0.82%
CUSTOMER EQUIPMENT	102,669	46	734	0.42%
OVERLOAD	734,655	35	4,813	0.32%
UG DIG-UP	130,781	33	1,130	0.30%
OBJECT CONTACT WITH LINE	83,518	29	1,059	0.27%
HUMAN ERROR - COMPANY	387,992	28	7,962	0.26%
FIRE	625,264	26	5,632	0.24%
VANDALISM	117,239	12	5,246	0.11%
PREVIOUS LIGHTNING	14,121	7	49	0.06%
OTHER UTILITY-NON ELEC	2,692	3	8	0.03%
ICE	1,793	1	1	0.01%
OTHER ELECTRIC UTILITY	269,328	1	933	0.01%
SWITCHING ERROR	9,196	1	76	0.01%
TOTAL	162,644,608	10,873	769,916	100.00%

Proposed Solutions – West Penn Power

Equipment Failure

West Penn Power addresses equipment failures using a three prong approach. The first approach is to conduct pole by pole reviews of mainline hardware and correct any deficiencies found. The second approach is a manual review of the entire overhead circuit, visiting all locations on a six-year cycle. And the third approach is conducting an engineering review and root cause analysis of all distribution circuit lockouts. The number of equipment failures is mitigated through these inspection and maintenance practices and the follow up corrective actions. In addition, the Engineering Department periodically conducts a multi-operation device review to identify causes and trends of equipment failures and other outage causes. Engineering then plans accordingly to repair or replace facilities.

Trees/Not Preventable

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 or the integrity of the line under any weather condition. West Penn Power also began targeting live, healthy trees that pose a threat to service reliability or integrity of the line by uprooting, breaking, or otherwise falling into the line.

Unknown

There are numerous events, which are typically transient in nature, that result in outages with the cause unknown. Procedures are in place for field personnel to investigate recurring outages on a specific sectionalizing device. Experience has shown that very few of the outage events classified as Unknown are recurrent in nature. West Penn Power has also introduced a root cause analysis process for all circuit lockouts that includes field patrols of all questionable outage causes.

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 2012		West Penn Power		
		Planned Annual	Completed	
			3Q	YTD
Forestry	Transmission (Miles)	318.10	71.27	99.63
	Distribution (Miles)	4,533	932	3,322
Transmission	Aerial Patrols	2	0	2
	Groundline	206	258	258
Substation	General Inspections	5,050	1,515	4,040
	Transformers	405	102	392
	Breakers	210	68	210
	Relay Schemes	140	34	139
Distribution	Capacitors	1,360	0	1,360
	Poles	42,180	0	42,582
	Reclosers	3,556	610	731
	Radio-Controlled Switches	West Penn Power has no radio-controlled switches.		

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 Expenditures³

		T&D O&M 2012				
Company	FERC	Q3 Actuals	Q3 Budget	Q3 YTD Actuals	Q3 YTD Budget	Annual Budget
West Penn Power	560 Operation Supervision and Engineering	-	-	(70,659)	(70,659)	(70,659)
	581 Load Dispatching	624,453	2,204,691	1,641,565	4,678,650	6,950,594
	562 Station Expenses	162,486	811,592	325,578	1,541,303	2,301,816
	563 Overhead Lines Expenses	181	-	89,255	102,779	102,779
	565 Transmission of Electricity by Others	5,494,904	131,409	19,392,465	6,178,934	17,730,188
	566 Miscellaneous Transmission Expenses	55,411	35,978	185,493	107,907	136,868
	567 Rents	10	3,606,101	230	7,612,804	-
	568 Maintenance Supervision and Engineering	133,278	371,813	427,522	801,960	1,088,963
	569 Maintenance of Structures	6,086	40,477	24,361	77,149	110,421
	570 Maintenance of Station Equipment	173,046	35,461	640,743	384,665	415,701
	571 Maintenance of Overhead Lines	1,150,413	1,185,391	3,153,374	2,697,020	3,527,269
	572 Maintenance of Underground Lines	-	-	575	-	-
	575 Market Administration, Monitoring & Compliance Sys	16,133	-	78,412	44,308	44,308
	560 Operation Supervision and Engineering	40,260	58,182	580,653	595,041	643,882
	581 Load Dispatching	440,393	643,245	1,630,809	1,726,549	2,279,657
	582 Station Expenses	777,063	245,469	1,325,278	502,114	733,217
	583 Overhead Line Expenses	158,797	169,993	483,785	420,475	575,123
	584 Underground Line Expenses	276,547	316,686	881,907	912,593	1,200,687
	586 Meter Expenses	165,004	153,372	476,352	425,684	581,429
	587 Customer Installations Expenses	-	-	108,604	108,604	108,604
	588 Miscellaneous O&M Expenses	2,154,343	1,697,211	6,974,436	4,781,581	6,887,560
	589 Rents	-	-	2,713	2,713	2,713
	590 Maintenance Supervision and Engineering	87,324	132,875	731,290	811,698	906,276
	592 Maintenance of Station Equipment	757,734	1,211,639	2,418,964	3,202,982	4,319,496
	593 Maintenance of Overhead Lines	(10,141,314)	5,500,542	(2,983,206)	15,388,151	19,752,461
	594 Maintenance of Underground Lines	124,430	210,991	279,933	470,050	667,349
	595 Maint. Line Transformer	-	-	48,027	48,027	48,027
	596 Maintenance of Street Lighting and Signal Systems	191,720	119,850	406,337	282,504	396,513
	597 Maintenance of Meters	1,123,492	408,735	1,428,666	983,537	1,362,485
	598 Maintenance of Miscellaneous Distribution Plant	20,294	232,044	288,666	554,975	745,851
West Penn Power Total		3,992,497	19,723,758	40,972,127	55,374,095	73,549,580

³ Budgets are 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 Expenditures⁴

T&D Capital - 2012						
Company	Investment Reason	Q3 Actuals	Q3 Budget	Q3 YTD Actuals	Q3 YTD Budget	Annual Budget
WestPennPower	Capacity	2,562,293	207,042	1,735,005	4,087,080	4,154,480
	Condition	1,418,174	3,159,095	5,399,829	6,406,734	8,836,187
	Facilities	1,967,904	415,871	5,939,535	5,073,859	5,401,834
	Forced	15,486,679	8,242,878	25,303,962	21,338,781	30,209,021
	Meter Related	25,046	882,386	(27,822)	1,150,870	2,011,450
	New Business	5,066,055	5,460,139	13,078,419	14,036,539	17,244,298
	Other	4,915,121	(3,560,263)	12,888,869	(3,554,432)	(2,594,517)
	Reliability	646,304	1,955,448	2,561,037	5,903,519	10,509,227
	Street Light	(24,923)	654,137	174,787	1,308,998	1,636,205
	Tools & Equip	843,443	955,868	2,887,178	2,199,753	2,976,949
	Vegetation Mgt.	8,251,982	10,657,917	22,382,579	26,096,514	31,981,095
WestPenn Power Total		41,158,077	29,030,518	92,323,376	84,047,217	112,366,229

⁴ Budgets are 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 2012					
Department	Staff	1Q	2Q	3Q	4Q
Line	Leader / Chief	82	82	81	
	Lineman	170	175	178	
Substation	Leader	14	15	14	
	Electrician	46	48	49	
	Total	312	320	322	

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 2012 (\$)					
	1Q	2Q	3Q	4Q	Total
West Penn Power	1,483,675	3,348,987	3,313,318		8,145,980

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 - 2012	
	West Penn Power
January	38%
February	45%
March	29%
April	34%
May	31%
June	24%
July	24%
August	23%
September	23%

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					
2012	Total Call-Outs	Workers Accepting	Elapsed Time (Minutes)	Average Response Time per Crew Call-Out (Minutes)	Average Response Rate Per Workers Accepting (Minutes)
July	1085	684	5115	8.45	7.48
August	934	710	4033	6.56	5.68
September	1062	769	4440	6.58	5.77
3Q Total	3081	2163	13588	7.20	6.31

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

West Penn Power									
Circuit Rank	Substation	Circuit Desc	Average Customers	Outages	Customer Minutes	Customers Affected	SAIDI	CAIDI	SAIFI
1	DUTCH FORK	W ALEXANDER	1142	63	2,426,311	2,669.00	2,125	909	2.34
2	FAYETTEVILLE	BIKLE ROAD	1147	44	2,073,511	2,250.00	1,808	922	1.96
3	FRANKLIN	ROGERSVILLE	675	29	2,058,014	1,160.00	3,049	1,774	1.72
4	NECESSITY	OHIO PYLE	805	40	1,917,729	3,340.00	2,382	574	4.15
5	RUTAN	WINDRIDGE	1346	63	1,858,054	3,411.00	1,380	545	2.53
6	AMITY	BANETOWN	1450	45	3,166,064	5,875.00	2,183	539	4.05
7	HOUSTON	MCGOVERN	1724	38	1,782,694	5,761.00	1,034	309	3.34
8	RUTAN	BRISTORIA	1186	66	1,778,843	4,314.00	1,500	412	3.64
9	FOUNTAINDALE	CARROLL VALLEY	1209	41	1,760,711	2,510.00	1,456	701	2.08
10	LANTZ	MEADOW	658	16	1,796,953	2,470.00	2,731	728	3.75
11	AMITY	AMITY	505	21	1,863,283	2,336.00	3,690	798	4.63
12	BETHLEN	DARLINGTON	1194	77	1,551,472	3,623.00	1,299	428	3.03
13	FRAZIER	STAR JUNCTION	1757	23	1,512,093	2,642.00	861	572	1.5
14	BETHLEN	WILPEN	1360	69	1,341,516	3,969.00	986	338	2.92
15	FRANKLIN	SOUTH WAYNESBURG	2087	35	1,402,647	4,166.00	672	337	2.
16	NORTH UNION	MOUNT VERNON	1643	18	1,333,160	5,139.00	811	259	3.13
17	QUINCY	SOUTH MOUNTAIN	871	25	1,210,912	2,087.00	1,390	580	2.4
18	MERRITTSTOWN	REPUBLIC	1617	26	1,445,727	4,861.00	894	297	3.01
19	BLUE RIDGE SUMMIT	SABILLASVILLE	964	44	1,103,866	1,783.00	1,145	619	1.85
20	SEWICKLEY	HERMINIE	1150	26	1,009,056	2,978.00	877	339	2.59
21	VESTABURG	MEXICO	593	16	911,449	2,243.00	1,537	406	3.78
22	SILVERVILLE 138-12	HARRISON	1183	31	889,830	5,407.00	752	165	4.57
23	FORT PALMER	WEST FAIRFIELD	984	53	789,208	1,554.00	802	508	1.58
24	MATHER	JEFFERSON	1376	23	853,338	4,657.00	620	183	3.38
25	GRAND POINT	SCOTLAND	727	15	762,475	1,314.00	1,049	580	1.81
26	BUCKEYE NO.3	S MUDDY CREEK	964	23	753,600	3,736.00	782	202	3.88
27	GUILFORD	DIXIE	1568	36	728,615	2,816.00	465	259	1.8
28	HUNTINGDON	PENNA AVE	1577	11	721,692	5,233.00	458	138	3.32
29	CROSSGATES	ROBINHOOD	907	11	729,270	2,625.00	804	278	2.89
30	SHAFFERS CORNER	SEVENTH ST RD	2085	26	743,102	7,597.00	356	98	3.64
31	NORTH FAYETTE	TYRE	1362	24	704,580	3,595.00	517	196	2.64
32	HUNTINGDON	SHAWTOWN	1737	18	656,925	5,052.00	378	130	2.91
33	VESTABURG	LOW HILL	702	26	652,054	2,278.00	929	286	3.25
34	BETHLEN	LAUGHLINTOWN	1099	46	638,953	2,309.00	581	277	2.1
35	LARDIN	MCCLELLANDTOWN	560	16	641,496	1,402.00	1,146	458	2.5
36	WEST FINLEY	WEST FINLEY	129	21	643,180	504.00	4,986	1,276	3.91
37	LAGONDA	CLUB FORTY	899	19	619,791	2,805.00	689	221	3.12
38	MCDONALD	NOBLESTOWN	1659	12	618,372	7,277.00	373	85	4.39
39	FOOTEDALE	FOOTEDALE	1202	31	1,978,963	3,220.00	1,646	615	2.68
40	WASHINGTON	PARK	1597	23	608,936	2,739.00	381	222	1.72
41	SALTSBURG	SALINA	826	32	605,905	2,199.00	734	276	2.66
42	UPTON	HEISEY	561	16	627,147	1,671.00	1,118	375	2.98

ATTACHMENT B

Worst Performing Circuits – Remedial Action

West Penn Power			
Rank	Substation	Circuit	Remedial Actions Planned or Taken
1	DUTCH FORK	W ALEXANDER	25% of the customer interruptions were due to the unknown, 38% lightning, and another 17% were due to trees.
2	FAYETTEVILLE	BIKLE ROAD	66% of the customer interruptions were due to equipment failure and another 39% were due to trees. The 10/29/11 snow storm affected the circuit. Action Plan: Patrol 1.1 miles of the circuit three-phase main line to inspect hardware in this section. Review two taps on circuit which had same device operated three or more times to determine any further action needed.
3	FRANKLIN	ROGERSVILLE	21% of the customer interruptions were due to equipment failure and another 67% were due to trees.
4	NECESSITY	OHIOPYLE	28% of the customer interruptions were due to equipment failure and another 63% were due to trees. The circuit is to be reviewed for mainline hardware issues in 2012.
5	RUTAN	WINDRIDGE	24% of the customer interruptions were due to the unknown and another 47% were due to trees. Forestry is planning to trim in 2013.
6	AMITY	BANETOWN	24% of the customer interruptions were due to the unknown and another 65% were due to trees. Forestry to trim circuit in 2012.
7	HOUSTON	MCGOVERN	29% of the customer interruptions were due to equipment failure and another 53% were due to trees. 2012 hardware review planned.
8	RUTAN	BRISTORIA	61% of the customer interruptions were due to equipment failure and another 23% were due to trees. Forestry to trim the circuit in 2012.
9	FOUNTANDALE	CARROLL VALLEY	67% of the customer interruptions were due to equipment failure and another 12% were due to trees. This circuit is one of the circuits on the 2012 circuit inspection program. Any hardware issues will be addressed by that program.
10	LANTZ	MEADOW	43% of the customer interruptions were due to vehicle and another 34% were due to trees. 2012 hardware review planned.
11	AMITY	AMITY	23% of the customer interruptions were due to wind, 14% due to vehicle, and another 28% were due to line failure. This circuit was significantly affected by a June 29th 2012 Derecho storm. The circuit had Zone 1 danger tree work performed in 2011 and is scheduled for a 2012 hardware review.
12	BETHLEN	DARLINGTON	82% of the customer interruptions were due to trees, mostly during spring 2012 storms. Zone 2 trimming planned for 2012.
13	FRAZIER	STAR JUNCTION	70% of the customer interruptions were due to trees. Forestry trimmed in 2011.
14	BETHLEN	WILPEN	48% of the customer interruptions were due to trees and another 33% were due to wind. The circuit was affected by weather during spring storms, possibly a tornado. Mainline danger tree removal completed in 2011. Forestry to trim in 2013.
15	FRANKLIN	SOUTH WAYNESBURG	50% of the customer interruptions were due to forced outage and another 20% were due to line failure. Forestry trimmed the circuit in 2011. The circuit is scheduled to be patrolled in 2012. Forestry trimmed in 2012.
16	NORTH UNION	MOUNT VERNON	40% of the customer interruptions were due to vehicles and another 40% were due to line failure. Forestry to trim in 2013.

West Penn Power			
Rank	Substation	Circuit	Remedial Actions Planned or Taken
17	QUINCY	SOUTH MOUNTAIN	85% of the customer interruptions were due to trees. The 10/29/11 snowstorm affected performance. Forestry is scheduled to trim in 2013. 2012 Action Plan: Patrol circuit mainline for hardware issues.
18	MERRITTSTOWN	REPUBLIC	19% of the customer interruptions were due to trees and another 52% were due to line failure. Forestry to trim in 2013.
19	BLUE RIDGE SUMMIT	SABILLASVILLE	47% of the customer interruptions were due to trees and another 19% were due to line failure. Completed CAIDI project in 2010. Action Plan: Patrol the circuit main line to inspect for hardware issues. Review one tap on circuit which had same device operated three times to determine any further action needed. Continue to monitor the circuit outside of storms.
20	SEWICKLEY	HERMINE	38% of the customer interruptions were due to lightning and another 31% were due to trees. This circuit was significantly affected by a June 29th 2012 Derecho storm. Monitor the circuit outside of storms.
21	VESTABURG	MEXICO	51% of the customer interruptions were due to vandalism and another 33% were due to trees. 2012 hardware review planned.
22	SILVERVILLE 138-12	HARRISON	35% of the customer interruptions were due to the unknown, 29% were due to lightning and another 21% were due to trees. The circuit is to be reviewed for main line hardware issues in 2012. Forestry to trim the main line in 2012.
23	FORT PALMER	WEST FAIRFIELD	21% of the customer interruptions were due to forced outage and another 64% were due to trees. Forestry to trim in 2013.
24	MATHER	JEFFERSON	85% of the customer interruptions were due to the unknown. Forestry to trim in 2012.
25	GRAND POINT	SCOTLAND	28% of the customer interruptions were due to trees and another 55% were due to line failure. The 10/29/11 snowstorm affected the circuit. Forestry is scheduled to trim the circuit in 2013. Patrol circuit main line for hardware issues in 2012.
26	BUCKEYE NO.3	S MUDDY CREEK	34% of the customer interruptions were due to the unknown and another 27% were due to line failure. Zone 1 tree trimming planned for 2012.
27	GUILFORD	DIXIE	57% of the customer interruptions were due to equipment failure and another 20% were due to trees. The circuit is on the 2012 Annual circuit Inspection Program.
28	HUNTINGDON	PENNA AVE	65% of the customer interruptions were due to overload and another 20% were due to wind. Outages were due to equipment (recloser) overload. Load has been transferred off the circuit, and line load has been balanced. The circuit over-current protection was re-engineered in order to replace heavily loaded equipment, add additional fusing, and bring existing fusing into compliance with standard Engineering Manual guidelines.
29	CROSSGATES	ROBINHOOD	59% of the customer interruptions were due to trees and another 39% were due to the unknown. Zone 1 tree trimming planned for 2012.

West Penn Power			
Rank	Substation	Circuit	Remedial Actions Planned or Taken
30	SHAFFERS CORNER	SEVENTH ST RD	55% of the customer interruptions were due to trees and another 43% were due to the unknown. Zone 1 tree trimming to be performed in 2012.
31	NORTH FAYETTE	TYRE	42% of the customer interruptions were due to animals and another 45% were due to trees. Forestry to trim in 2012.
32	HUNTINGDON	SHAWTOWN	35% of the customer interruptions were due to equipment failure and another 36% were due to trees. Forestry trimmed in 2011.
33	VESTABURG	LOW HILL	61% of the customer interruptions were due to vandalism and another 26% were due to unknown. The circuit to be patrolled in 2012.
34	BETHLEN	LAUGHLINTOWN	34% of the customer interruptions were due to equipment failure and another 45% were due to trees. The circuit is to be reviewed for main line hardware issues in 2012. Forestry trimmed in 2011.
35	LARDIN	MCCLELLANTOWN	46% of the customer interruptions were due to the unknown and another 26% were due to trees. SAIFI Hardware review planned for 2012.
36	WEST FINLEY	WEST FINLEY	59% of the customer interruptions were due to trees and another 21% were due to the unknown. The circuit is scheduled for a 2012 hardware review.
37	LAGONDA	CLUB FORTY	81% of the customer interruptions were due to lightning. This circuit was significantly affected by a June 29th 2012 Derecho storm. Zone 1 danger tree work completed in 2011.
38	MCDONALD	NOBLESTOWN	60% of the customer interruptions were due to vehicle and another 25% due to fire affecting FE equipment. The circuit was reviewed for main line hardware issues in 2012. Forestry to trim in 2012.
39	FOOTEDALE	FOOTEDALE	25% of the customer interruptions were due to trees and another 21% due to line failure and 32% due to equipment failure. Forestry planning to trim in 2012.
40	WASHINGTON	PARK	38% of the customer interruptions were due to equipment failure and another 58% due to unknown. The customer interruptions circuit is scheduled for a 2012 hardware review.
41	SALTSBURG	SALINA	37% of the customer interruptions were due to trees and another 41% due to equipment failure. The circuit was reviewed for main line hardware issues. Corrective work completed in 2011. Forestry trimmed the main line in 2011. Forestry plans to trim the circuit in 2013.
42	UPTON	HEISEY	53% of the customer interruptions were due to equipment failure and another 46% due to trees. The 10/29/11 snowstorm affected the circuits performance. Continue to monitor the circuit outside of storm-caused outages.

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 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.