

2022 Implementation Plan
of
PECO ENERGY COMPANY
to the
PA PUC Management and Operations Audit
Docket No. D-2021-3023906



August 10, 2022

Introduction

PECO Energy is pleased to submit this Implementation Plan for review by the Pennsylvania Public Utility Commission (PAPUC). The Implementation Plan is in response to the recommendations contained in the Management and Operations Audit report issued July 2022, Docket No. D-2021-3023906. The Implementation Plan provides PECO Energy's commitment to act on the recommendations by addressing opportunities for improvement in operational effectiveness while improving service to our customers.

Of the twenty-two (22) recommendations contained in the Audit Report, PECO Energy has accepted nineteen (19) of them completely and has Partially Accepted the remaining three (3).

As requested, this Implementation Plan details the actions to be taken, the expected completion dates and the individuals responsible for implementing each recommendation.

**PECO Energy Company
Management and Operations Audit**

**IMPLEMENTATION PLAN for
2022 PA PUC Management Audit Report**

Recommendation V-1

Submit a detailed proposal to the Commission for the appropriate crediting of ratepayers due to PECO's corrected billings for the use of PECO's fiber network.

Response

Accepted

Action

As part of the Company's next electric distribution rate case filing, PECO will submit a detailed proposal to the Commission for the appropriate crediting to electric distribution ratepayers for the Distribution piece of the corrected fiber billings.

Crediting of the corrected fiber billings for the electric transmission customers was included as part of the Transmission Formula's annual rate update in May 2022, except for a small true-up amount which will be reflected in the May 2023 update with interest.

Individual Responsible

Richard G. Webster, Jr, VP Regulatory Policy and Strategy

Expected Completion Date

Electric Distribution: Next electric distribution rate case filing (TBD)

Electric Transmission: Next Transmission annual update (May 2023)

Actions Taken

**PECO Energy Company
Management and Operations Audit**

**IMPLEMENTATION PLAN for
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Recommendation V-2

Document PECO's annual process and continue to perform detailed reviews of all allocation factors, including utility-owned project allocation rates, to ensure costs are distributed in accordance with approved agreements.

Response

Accepted

Action

PECO will document the processes used each year to update allocation rates.

Individual Responsible

Carrie Fulginiti, Director Accounting

Expected Completion Date

February 28, 2023

Actions Taken

**PECO Energy Company
Management and Operations Audit**

**IMPLEMENTATION PLAN for
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Recommendation V-3

File PECO's money pool agreement for approval with the PUC.

Response

Accepted

Action

PECO will submit a copy of our active Money Pool agreement to the PUC for review and approval.

The Company will provide a subsequent filing, if and when, the agreement is updated in the event of agreement term changes and/or when an affiliate joins or exits the agreement.

Individual Responsible

Richard G. Webster, Jr, VP Regulatory Policy and Strategy
Anthony E. Gay, VP and General Counsel

Expected Completion Date

Initial Filing: Q4 2022
Supplemental Filing: TBD (*submission will be rendered ad-hoc as necessary*)

Actions Taken

**PECO Energy Company
Management and Operations Audit**

**IMPLEMENTATION PLAN for
2022 PA PUC Management Audit Report**

Recommendation VII-1

Reduce Electric Operations staff overtime 15% overtime hours per normal hours worked or less.

Response

Partially Accepted

Reasoning

PECO agrees that the use of overtime should continue to be analyzed for potential reductions; however, PECO does not accept the recommendation that overtime should be reduced to 15% of normal hours worked.

Overtime analysis needs to be segmented by storm and non-storm categories due to the importance of overtime in company operations. This distinction is not reflected in the recommendation as written. That, along with the value of overtime hours worked, must be taken into account when considering any reduction in overtime. PECO agrees it is a good business practice to continue to analyze and identify opportunities to reduce overtime, but within the context of these additional, necessary considerations.

Storm Overtime: Overtime related to storm events is dependent on the type and severity of events in PECO's territory and, in general, is non-controllable. It is a core responsibility and commitment of PECO employees to meet our customers' expectations to restore service as quickly and safely as possible which can require the efforts of many employees working significant additional hours in a specific time window. Customers expect fewer and shorter service interruptions and have less tolerance for extended outages.

PECO staffs for forecasted weather in the territory and the need for employee storm overtime will continue as the frequency of storms in the territory has increased 30% over the last five years (2017-2021). In the same five year period, PECO experienced three of the ten largest storms in company history. The volume of storm overtime hours directly correlates with these significant storms in 2018 and 2020 and has been trending positively since 2019.

In addition to serving PECO customers, PECO employees often respond to support the utilities in the Exelon family when their customers are significantly impacted by storms. Similarly, PECO provides mutual assistance as a member of the Southeastern Electric Exchange and North Atlantic Mutual Assistance Group organizations and responds to requests as part of the reciprocal arrangement with fellow member companies. Supporting these companies also contributes to storm overtime hours.

In summary, storm overtime is dependent on non-controllable weather and it will continue to have variability for the business. PECO agrees use of storm overtime should continue to

be monitored and challenged. However, it should be assessed separately from all company overtime and not subject to a specific target.

Non-Storm Overtime: PECO maintains that its non-storm overtime hours average for all company departments combined is reasonable and warranted. Similar to storm overtime, PECO agrees it should continue to analyze and challenge the use of non-storm overtime for all departments. PECO has an aggressive staffing strategy to help reduce overtime but will require time to overcome the impact of pandemic delays on training and the multi-year progression timeline for new craft employees.

When analyzing and identifying opportunities for overtime reduction, the value of the overtime hours must be considered. Overtime is often necessary to meet various infrastructure program commitments (LTIP) and the future benefit those programs will provide (e.g., reduction of future customer calls or system issues) must be considered. Additionally, there is great value in overtime that is necessary to operate safely and to improve reliability for customers. Further, to reduce overtime hours in the short run, contractors would be needed at rates equal or above PECO's overtime rate which would increase costs and not produce savings.

PECO's non-storm overtime hours average is 14.4% of worked hours for all departments combined. Although this is a reasonable percentage, PECO agrees it should continue to analyze and challenge the use of non-storm overtime and look for opportunities to reduce it.

Action

Electric Operations will evaluate several alternatives and implement follow up actions to improve overtime (OT) performance.

1. Continue to outsource certain non-core work activities that have been previously insourced since the last audit. Examples of work activities currently outsourced include worksite flagging and secondary fault locate and repair work, paving and restoration. Continue to evaluate other outsourcing opportunities through the audit study timeframe.
2. Assess vacancy rates within the Electric Operations organization through the audit study timeframe to assess impact of open positions on overall OT rate. Continue to pursue aggressive hiring practices to staff up Electric Operations to ensure that vacancies are appropriately filled in timely manner.
3. Increase staffing levels of critical craft resources in Electric Operations. Increasing staffing levels will require several years due to the lengthy progression for Aerial Line Mechanics (42 months). Training of new electric mechanics was also negatively impacted by pandemic with several scheduled classes needing to be canceled. The ratio of first-class ALMs to apprentices will be monitored to ensure adequate field expertise for safety and training purposes.
4. Continue to execute PECO's Electric LTIP program to replace aged infrastructure and increase resiliency of system. As the system is hardened, we would expect to see decrease in equipment failures that drive significant OT. Examples include URD cable replacement and pole replacement.
5. Continue to assess the current allocation of resources between the Electric Operations organizations (C&M and DSO) to determine if a resource shift is needed to normalize workload.

6. Continue to review and adjust current shift coverage analysis within Electric Operations to determine if resources are needed to be allocated to different work schedules for OT reduction.
7. Establish key performance metrics focused on OT hours worked to replace and or supplement OT budget spend metrics.

PECO's analysis indicates that injuries are not correlated to OT hours; however, we will continue to monitor both mental and physical fatigue and ensure safe working procedures are followed.

Individual Responsible

Nicole Levine, VP Electric Operations

Expected Completion Date

Q4 2023

Actions Taken

**PECO Energy Company
Management and Operations Audit**

**IMPLEMENTATION PLAN for
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Recommendation VII-2

Improve SAIDI and CAIDI to at or below the PUC Benchmarks.

Response

Accepted

Action

Continue to implement the PUC LTIP plan to replace aged infrastructure and enhance breakdown capabilities. As the system continues to be storm hardened, we would expect to see a decrease in equipment failures as outlined in the PUC LTIP plan. Examples include replacement of URD cables and aerial equipment.

Individual Responsible

Brian Crowe, VP Technical Services

Expected Completion Date

December 31, 2025

Actions Taken

**PECO Energy Company
Management and Operations Audit**

**IMPLEMENTATION PLAN for
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Recommendation VII-3

Reduce the number of customers experiencing multiple interruptions and strive to have zero CEMI 10+.

Response

Accepted

Action

PECO will evaluate any customer that experiences ten or more sustained interruptions in a given year. PECO will also continue to implement the current PUC LTIP plan to address CEMI customers through CEMI Areas and CEMI Targeted Circuits. This will mitigate further customers from being added to the CEMI population. Lastly, PECO will continue to utilize CEMI as a selection factor for PECO's worst performing circuits program.

Individual Responsible

Brian Crowe, VP Technical Services

Expected Completion Date

December 31, 2025

Actions Taken

**PECO Energy Company
Management and Operations Audit**

**IMPLEMENTATION PLAN for
2022 PA PUC Management Audit Report**

Recommendation VII-4

Reduce outages caused by broken/uprooted vegetation to the 2015-2018 average levels.

Response

Partially Accepted

Reasoning

PECO accepts the recommendation to reduce outages caused by broken/uprooted vegetation. PECO, however, does not accept the recommendation's target of 2015-2018 average levels. This range is not reflective of the improved outage coding accuracy which has been implemented over the past few years to reduce the amount of outages with an "Unknown" cause code and subsequently resulted in an increased amount of "Vegetation" related outages. Additionally, the extensive prevalence of deteriorated Ash trees due to the destructive Emerald Ash Borer in the PECO service territory will have a significant impact over the next several years.

Action

PECO is committed to reducing the amount of broken and uprooted vegetation outages through the Worst Performing Vegetation Section program, hazard tree removals, Emerald Ash Borer mitigation initiative and aggressive canopy management associated with other capital distribution projects.

Individual Responsible

Brian Crowe, VP Technical Services

Expected Completion Date

December 31, 2025

Actions Taken

**PECO Energy Company
Management and Operations Audit**

**IMPLEMENTATION PLAN for
2022 PA PUC Management Audit Report**

Recommendation VII-5

Reduce interruptions caused by equipment failures.

Response

Accepted

Action

PECO will continue to proactively replace additional targeted switchgear in 2021 pursuant to the current LTIIP. While switchgear-related failures do not currently have a major impact on PECO's overall reliability metrics, the high customer impact that such failures may create warrants proactively addressing the condition issues of deterioration and obsolete switchgear. Additionally, the replacement of associated equipment and the addition of remote control and visibility can improve reliability.

PECO will continue accelerated retirement of unit substations containing obsolete equipment that is difficult or costly to replace and are experiencing an increasing rate of failure with high customer impact. PECO will also continue to upgrade the portion of the distribution system down-stream from the substation to operate at a higher voltage level. These upgrades to the distribution facilities supplied by the units to the operating voltage of the surrounding higher voltage feeders increases operating flexibility by providing additional load-transfer options. This improves the ability to respond to outages, particularly major storms, by providing alternate sources and paths that can be used to reroute power to customers who were interrupted for any reason or to perform routine maintenance. Additionally, voltage up-rating will also increase the ability of those feeders to handle the interconnection of additional customer-owned solar facilities.

PECO will continue to replace aerial and underground equipment through other programs highlighted in the current LTIIP such as Aerial Infrastructure Resiliency programs, Main Stem Cable Replacement Program, and Underground Residential Development (URD) Replacement Program. Under the aerial programs, PECO will replace aging infrastructure with equipment that is designed to withstand wind and ice loading consistent with the Grade B construction guidelines defined by the National Electric Safety Code. Equipment will be replaced with newer or more technically sophisticated models made of the most up-to-date materials. The strength of the new installations will improve reliability in normal weather conditions and provide enhanced resistance to storm-related damage.

Individual Responsible

Brian Crowe, VP Technical Services

Expected Completion Date

December 31, 2025

Actions Taken

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
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Recommendation VIII-1

Reduce company-at-fault hits on gas infrastructure.

Response

Accepted

Action

PECO is currently implementing the following initiatives for damage prevention:

1. Implementation of Urbint Lens risk score technology.
2. Continued use of Vacuum Excavation Crews and inline camera, targeting High Profile/Problem Locates.
3. Continued Quality Field Audits performed by Senior Contract Coordinators (SCCs) on USIC locates.
4. Continued Quality Control audits of submission of As Builts and Gas Facility Records.
5. Continued Quality Field Audits of newly constructed mains/services verifying tracer wire, marker ball placement, and record accuracy.

Individual Responsible

David Haverstick, Manager of Damage Prevention

Expected Completion Date

Q4 2023

Actions Taken

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
2022 PA PUC Management Audit Report**

Recommendation VIII-2

Study and then identify ways to reduce plastic pipe main and service damages with a focus on line hits.

Response

Accepted

Action

PECO is currently implementing the following initiatives for damage prevention:

1. Implementation of Urbint Lens risk score technology.
2. Continued use of Vacuum Excavation Crews and inline camera, targeting High Profile/Problem Locates.
3. Continued Quality Field Audits performed by Senior Contract Coordinators (SCCs) on USIC locates.
4. Continued Quality Control audits of submission of As Builts and Gas Facility Records.
5. Continued Quality Field Audits of newly constructed mains/services verifying tracer wire, marker ball placement, and record accuracy.

Individual Responsible

David Haverstick, Manager of Damage Prevention

Expected Completion Date

Q4 2023

Actions Taken

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
2022 PA PUC Management Audit Report**

Recommendation VIII-3

Reduce Gas Operations staff overtime 15% overtime hours per normal hours worked or less.

Response

Partially Accepted

Reasoning

PECO agrees that the use of overtime should continue to be analyzed for potential reductions; however, PECO does not accept the recommendation that overtime should be reduced to 15% of normal hours worked.

Overtime analysis needs to be segmented by event and non-event categories due to the importance of overtime in company operations. This distinction is not reflected in the recommendation as written. That, along with the value of overtime hours worked, must be taken into account when considering any reduction in overtime. PECO agrees it is a good business practice to continue to analyze and identify opportunities to reduce overtime, but within the context of these additional, necessary considerations.

Event Overtime: Overtime related to gas events is dependent on the type and severity of events in PECO's territory and, in general, is non-controllable. It is a core responsibility and commitment of PECO employees to meet our customers' expectations to restore service as quickly and safely as possible which can require the efforts of many employees working significant additional hours in a specific time window. Customers expect fewer and shorter service interruptions and have less tolerance for extended outages. Gas event overtime is typically related to a gas system event, although the Gas organization supports storm events as well.

PECO agrees use of event overtime should continue to be monitored and challenged. However, it should be assessed separately from all company overtime and not subject to a specific target.

Non-Event Overtime: PECO maintains that its non-event overtime hours average for all company departments combined is reasonable and warranted. Similar to event overtime, PECO agrees it should continue to analyze and challenge the use of non-event overtime for all departments. PECO has an aggressive staffing strategy to help reduce overtime

but will require time to overcome the impact of pandemic delays on training and the multi-year progression timeline for new craft employees.

When analyzing and identifying opportunities for overtime reduction, the value of the overtime hours must be considered. Overtime is often necessary to meet various infrastructure program commitments (LTIP and AGIMP) and the future benefit those programs will provide (e.g., reduction of future customer calls or system issues) must be considered. Additionally, there is great value in overtime that is necessary to operate safely and to improve reliability for customers. Further, to reduce overtime hours in the short run, contractors would be needed at rates equal or above PECO's overtime rate which would increase costs and not produce savings.

PECO's non-event overtime hours average is 14.4% of worked hours for all departments combined. Although this is a reasonable percentage, PECO agrees it should continue to analyze and challenge the use of non-event overtime and look for opportunities to reduce it.

Action

Gas Operations will evaluate several alternatives and implement follow up actions to improve overtime (OT) performance.

1. Continue to outsource certain non-core work activities that have been previously insourced since the last audit. Examples of work activities currently outsourced include worksite flagging, paving and restoration. Continue to evaluate other outsourcing opportunities through the audit study timeframe.
2. Assess vacancy rates within the Gas Operations organization through the audit study timeframe to assess impact of open positions on overall OT rate. Continue to pursue aggressive hiring practices to staff up Gas Operations to ensure that vacancies are appropriately filled in timely manner.
3. Increase staffing levels of critical craft resources in Gas Operations. Increasing staffing levels will require several years due to the lengthy progression for Gas Mechanics (36 months). Training of new gas mechanics was also negatively impacted by pandemic with several scheduled classes needing to be canceled.
4. Continue to execute PECO's Gas LTIP program to replace aged infrastructure and increase resiliency of system. As the outmoded main system is replaced, we would expect to see a decrease in leaks and pressure problems that drive significant OT.
5. Continue to assess the current allocation of resources across the Gas Operations organization to determine if a resource shift is needed to normalize workload.
6. Continue to review and adjust current shift coverage analysis within Gas Operations to determine if resources are needed to be allocated to different work schedules for OT reduction.
7. Establish key performance metrics focused on OT hours worked to replace and or supplement OT budget spend metrics.
8. Enhance our damage prevention program to reduce damages and the OT required to respond and investigate.

9. Complete the program to replace all bare steel services on the gas system, which has been a primary cause of emergent leak repair that drives OT.
10. Initiate the Low Pressure Elimination program, which targets the replacement of all non-outmoded low-pressure with elevated pressure main to mitigate water intrusion and powder blockages, which are major drivers for storm-related OT.

PECO's analysis indicates that injuries are not correlated to OT hours; however, we will continue to monitor both mental and physical fatigue and ensure safe working procedures are followed.

Individual Responsible

Amy Hamilton, VP Gas Operations

Expected Completion Date

Q4 2023

Actions Taken

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
2022 PA PUC Management Audit Report**

Recommendation VIII-4

Accelerate the rate of GPS location for key gas infrastructure.

Response

Accepted

Action

PECO is actively investigating methods to accelerate its Gas Mapping Program and is on track to complete the scope of work prior to the 20-year end date.

Status as of July 2022 is as follows:

- Percentage of main completed: 26.5% (2,514 out of 9,473)
- Percentage of services completed: 19% (27,500 out of 145,000)

Individual Responsible

David Bucholtz, Manager, Gas Data Analytics

Expected Completion Date

Q2 2026

Actions Taken

PECO Energy Company
Stratified Management and Operations Audit

IMPLEMENTATION PLAN for
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Recommendation IX-1

Correct minor deficiencies in physical security.

Response

Accepted

Action

Two minor issues were identified at a service building – a section of barbed wire on fence to be replaced and minor erosion issue under a section of fence in the rear perimeter to be corrected.

One priority issue was identified at a gas asset – unsecured card reader door.

PECO continues to identify and address any deficiencies on an ongoing basis. PECO RE&F conducts monthly building and grounds inspections of PECO assets. Additionally, PECO Transmission & Substations (T&S) personnel conduct inspections every five weeks at electric assets, and PECO Gas personnel conduct inspections monthly at gas assets.

Individual Responsible

Tom Marshall, Sr. Manager, PECO Security
Alicia Glenn, Physical Security Specialist, PECO Security

Expected Completion Date

Two minor issues:

1. Barbed wire replaced – Completed May 10, 2022
2. Erosion issue – Completed June 23, 2022

One priority issue:

1. Door Adjusted/Secured and card reader functioning – Completed November 3, 2021.

Actions Taken

Two minor issues – service tickets were submitted via PECO Real Estate & Facilities (RE&F) Maximo work order system for completion.

One priority issue – service ticket was submitted via Exelon JIRA security work order system for completion.

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
2022 PA PUC Management Audit Report**

Recommendation IX-2

Ensure that all fire extinguishers and first aid kits are being inspected and tagged monthly.

Response

Accepted

Action

Two fire extinguishers located in Security Data Enclosures were identified without inspection stickers (North Wales Substation and Bradford Substation).

All other fire extinguishers at PECO locations are inspected monthly under the PECO Computerized Maintenance Management System also called “Maximo.” Each month a preventative maintenance building and grounds inspection work order is automatically generated in the system for every location. Once the work order is issued electronically, supervision assigns a mechanic to perform the required tasks. Supervision tracks the assigned work orders for monthly completion in the system.

First Aid Kits - First Aid Kits are the responsibility of the departments across PECO that use them. They are ordered and kept up to date by these user groups. In addition, during our annual compliance self-audits, PECO Safety inspects the first aid kits for outdated or missing items and works with the user groups to replace them.

Individual Responsible

Tom Marshall & Alicia Glenn, PECO Security (Fire Extinguishers in Security Data Enclosures)
Ben Henry, PECO Safety (First Aid Kits)

Expected Completion Date

Fire Extinguishers – February 7, 2022, and February 10, 2022
First Aid Kits – March 28, 2022

Actions Taken

Fire Extinguishers - PECO Security contacted PECO Real Estate & Facilities (RE&F) to schedule and maintain fire extinguisher inspections of newly installed fire extinguishers located within the Security Data Enclosures. Inspections were completed on February 7, 2022, and February 10, 2022.

First Aid Kits - Upon the post-COVID return to the office in March, PECO Safety issued a Safety Alert reminding all departments across PECO to inspect and update their First Aid Kits and

included instructions on how to reorder any missing or outdated items. Safety Alert SA-22-17 was sent out to all employees on March 28, 2022, with instructions on maintaining First Aid Kits and replacing missing and out-of-date items.

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
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Recommendation IX-3

Add an update and accountability section to the Safety Rulebook, move the table of contents closer to the beginning, and add chapter tabs or margin labels to encourage ease of navigation.

Response

Accepted

Action

Page 1 of the PECO Safety Rule Book is titled “PECO’s Commitment to Safety”. This section includes the accountability of Management and all PECO Employees for ensuring a safe work environment, including a personal commitment to safety. No further action needed.

The Table of Contents has been moved to Page 2 of the PECO Safety Rule Book.

PECO has moved to an all-electronic Safety Rule Book, and is currently developing a Safety App with a user friendly search function to access any section of the PECO Safety Rule Book. In addition, the PECO Safety Rule Book is on the PECO Safety SharePoint site, and the same search function currently exists there.

Individual Responsible

Benjamin Henry, Sr. Manager Safety and Human Performance

Expected Completion Date

Table of Contents: July 15, 2022

Safety App Update: September 15, 2022

Actions Taken

The Table of Contents has been moved to Page 2 as of July 15, 2022.

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
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Recommendation – IX-4

Develop a lifecycle tracking and replacement program for security equipment.

Response

Accepted

Action

PECO Security will develop a lifecycle tracking and replacement program for security equipment.

Individual Responsible

Tom Marshall, Sr. Manager, PECO Security
Alicia Glenn, Physical Security Specialist, PECO Security

Expected Completion Date

Q4 2023

Actions Taken

PECO Energy Company
Stratified Management and Operations Audit

IMPLEMENTATION PLAN for
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Recommendation XI-1

Continue outreach efforts to engage payment troubled customers, leverage pandemic and low-income resources to help reduce the overall level of outstanding customer balances.

Response

Accepted

Action

PECO is currently implementing the following efforts to engage payment troubled customers and to leverage pandemic and low-income resources:

- Continue through the pandemic outreach efforts to engage payment troubled customers.
- Continue receiving and processing ERAP funding to customers' past due balances.
- Apply available grants to small commercial and industrial customer accounts.
- Converting \$3.7M of unspent LIURP funding to a grant program administered through PECO's MEAF.
- Implement new Percent of Income Program as part of PECO's Universal Service and Energy Conservation Plan.
- Continue outreach to LMI customers in make them aware of program eligibility.

Individual Responsible

Kelly Colarelli, VP Customer Operations

Expected Completion Date

Q4 2023

Actions Taken

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
2022 PA PUC Management Audit Report**

Recommendation XI-2

Refocus efforts on customer experiences to drive customer service satisfaction through active listening and first call resolution.

Response

Accepted

Action

PECO will continue to improve customer experience and call satisfaction by:

1. Identifying drivers of repeat calls and identify improvement plans.
2. Providing refresher training to personnel on frequent call types such as high bills and connect calls.
3. Defining and tracking first call resolution.
4. Reviewing Quality guidelines for CSR standards.
5. Driving improvements and using the CX Wrapper to facilitate transaction completion.
6. Reinforcing Soft Skills training to ensure our CSRs acknowledge the customer's issue and demonstrate empathy.
7. Continuing to invest in advancing our online functionality on PECO.com and our Mobile App to allow 24 X 7 self-service options.

Individual Responsible

Kelly Colarelli, VP Customer Operations
Nicolette Brown, Director Customer Care

Expected Completion Date

Q4 2023

Actions Taken

PECO Energy Company
Stratified Management and Operations Audit

IMPLEMENTATION PLAN for
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Recommendation XI-3

Complete implementation of the replacement CIS.

Response

Accepted

Action

Continue CC&B training and system implementation plan, which has been in progress for over a year. Highlights include:

- Continue efforts to ensure new system covers all necessary business requirements.
- With design and enable phases complete, commence Hardening Phase where we perform end-to-end testing to ensure accuracy of the IT code.
- Continue multiple rounds of testing prior to “Go Live” date.
- Continue initial awareness training and execute necessary further training depending on role.
- Continue with various business readiness tasks.

Individual Responsible

Kelly Colarelli, VP Customer Operations

Expected Completion Date

4th Quarter 2023

Actions Taken

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
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Recommendation XI-4

Identify and address the root cause of CSR separations.

Response

Accepted

Action

Partner with Human Resources to define positive versus negative attrition and to redesign the process to gain insights to CSR separation.

Individual Responsible

Kelly Colarelli, VP Customer Operations
Nicolette Brown, Director Customer Care

Expected Completion Date

Q1 2023

Actions Taken

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
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Recommendation XIV-1

Improve Safety Performance.

Response

Accepted

Action

PECO is currently implementing the following Safety Best Practices, along with our sister utilities at Exelon:

1. Soft Tissue Injuries and Ergonomics Reduction
2. Serious Injury and Fatality (SIF) Prevention and Learning Model
3. Setting a Distribution Pole/PPE Requirements
4. Overhead Transmission Line Grounding Practices
5. Cable Identification Methods Prior to Cutting
6. Leading Safety Indicators
7. Mobile Equipment Grounding
8. Safety Protocols and Standards for working around communication equipment
9. RVA/MVA Reduction Benchmarking Best Practices

PECO leaders at the E04, E05, and E06 levels have been assigned to these teams to lead implementation here. Quarterly meetings are held with Senior Leadership to track progress and ensure completion of the milestones related to these Safety Best Practices. All field organizations including field personnel up through Senior Leaders are being trained on The Safety Classification Learning Model, including the Energy Hazard Wheel (second item above). This type of Hazard Recognition for the field and development of leading safety indicators will have the biggest impact on improving safety performance at PECO.

Individual Responsible

Benjamin Henry, Sr. Manager Safety and Human Performance

Expected Completion Date

Q4 2022

Actions Taken

**PECO Energy Company
Stratified Management and Operations Audit**

**IMPLEMENTATION PLAN for
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Recommendation XIV-2

Reduce the rate of all motor vehicle accidents.

Response

Accepted

Action

PECO is currently implementing RVA/MVA Reduction Benchmarking Safety Best Practices, along with our sister utilities at Exelon.

PECO also has two teams working on reducing RVAs and MVAs:

- Line Lead Safe Driving Team
- RVA/MVA Reduction Team

The Line Lead Safe Driving Team has a focus on reducing slow speed accidents when operators first get into their vehicles. The team completed a Circle for Safety and Proper Backing Techniques video this year with significant involvement from the field. The video went live in May 2022 and was rolled out to all PECO drivers in May/June 2022. The PECO RVA/MVA reduction team is working on building an in-house driving training program. This will focus on initial and reoccurring driving instruction, Smith Driving Training, CDL training, and Slow Speed Maneuvering.

Individual Responsible

Benjamin Henry, Sr. Manager Safety and Human Performance

Expected Completion Date

Q4 2023

Actions Taken