

**Legal Department**

Exelon Business Services Company  
2301 Market Street/ S23-1  
P.O.Box 8699  
Philadelphia, PA 19101-8699

Telephone 215.841.5544  
Fax 215.568.3389  
www.exeloncorp.com

Direct Dial: 215-841-4220  
September 18, 2009

**VIA FEDERAL EXPRESS**

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> floor  
Harrisburg, PA 17120

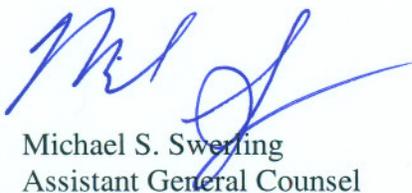
**Re: Inspection, Maintenance, Repair and Replacement Standards for Electric  
Distribution Companies, Docket No. M-2009-2094773**

Dear Mr. McNulty:

On May 22, 2008, the Pennsylvania Public Utility Commission (“Commission”) entered a Final Rulemaking Order (“Final Order”) at Docket L-00040167, which added section 57.198 to 52 Pa. Code, Chapter 57. The new regulation created inspection and maintenance (“I&M”) standards for electric distribution companies (“EDCs”). The Final Order was subsequently published in the Pennsylvania Bulletin on September 27, 2008. Pursuant to the new regulation, the Commission issued a Tentative Implementation Order (“Tentative Order”) at Docket M-2009-2094773, which set forth templates that EDCs must use to submit I&M plans to the Commission biennially. The Commission also placed each utility into groupings with specific submittal deadlines. The Tentative Order sought comments within thirty-days of its entry-date.

PECO Energy supports the Commission’s goal of better I&M practices in the Commonwealth. To support that end, PECO agrees with the Commission’s template and will submit its I&M plans in accordance with the biennial deadlines.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael S. Swerling", with a long horizontal flourish extending to the right.

Michael S. Swerling  
Assistant General Counsel

MSS/mb  
Enclosures