

Ward Smith
Assistant General Counsel
2301 Market Street / S23-1
Philadelphia, PA 19103

Direct Dial: 215-841-6863

July 31, 2015

VIA FEDERAL EXPRESS

Rosemary Chiavetta, Secretary
Pa. Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor - West
Harrisburg, PA 17120

**RE: Letter of Notification of PECO Energy Company Pursuant to 52 Pa. Code
Chapter 57 Subchapter G with Respect to the Construction of 230Kv
Transmission Facilities to Connect the Post Substation to the Transmission Grid
PUC Docket No.: A-_____**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Letter of Notification* with regard to the matter referenced above.

I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties. Thank you for your time and attention on this matter.

Very truly yours,



Ward L. Smith
Counsel for PECO Energy Company

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

cc: Certificate of Service

WS/lo

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of PECO Energy :
Company Pursuant to 52 Pa. Code :
Chapter 57 Subchapter G With Respect : **Docket No. A-_____**
to the Construction of 230 kV :
Transmission Facilities to Connect the :
Post Substation to the Transmission :
Grid :

LETTER OF NOTIFICATION

I. INTRODUCTION AND OVERVIEW

1. This Letter of Notification is filed pursuant to 52 Pa. Code §57.72(d)(1) (vi) to request the approval of the Pennsylvania Public Utility Commission (“Commission”) to construct approximately one-quarter (1/4) mile of 230kV transmission line located in the Borough of Marcus Hook and Lower Chichester Township, Delaware County, Pennsylvania. As more fully described hereafter, this transmission line work is necessary to electrically connect PECO’s to-be-constructed Post Substation to the transmission grid. Subject to the Commission’s siting approval, construction of the proposed transmission line modifications described herein is scheduled to begin in October 2015. This Letter of Notification and the accompanying Exhibits, which are incorporated herein by reference, contain all of the information required by 52 Pa. Code § 57.72(d)(4) for the siting approval requested herein.

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II. THE APPLICANT AND ITS ATTORNEY(S)
(52 Pa. Code § 52.72(c)(1) and (2))

2. The applicant is PECO Energy Company (“PECO” or the “Company”), 2301 Market Street, Philadelphia, Pennsylvania 19101. PECO is a public utility that supplies light, heat and power to the public, by means of electricity, in all or portions of six counties in southeastern Pennsylvania, including all of Delaware County. PECO is a “public utility” and an Electric Distribution Company (“EDC”), as those terms are defined in Sections 102 and 2803 of the Public Utility Code (66 Pa. C.S. §§102 and 2803), and is subject to the regulatory jurisdiction of the Commission.

3. PECO’s attorney is:

Ward L. Smith
Assistant General Counsel
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19101
215 841-6863
ward.smith@exeloncorp.com

PECO’s attorney is authorized to receive all notices and communications regarding this Letter of Notification.

III. THE NEED FOR THE PROPOSED TRANSMISSION
LINE MODIFICATIONS
52 Pa. Code § 52.72 (c)(5)

4. PECO will shortly begin construction of a new 230-34 kV substation in the Borough of Marcus Hook, to be known as the Post Substation. Post Substation will be used to

serve growing electric distribution load in the immediate area, including load at Sunoco Partners' Marcus Hook refinery.¹ The short stretch of transmission line that is the subject of this Letter of Notification will be used to electrically connect the Post Substation to the existing transmission grid. An aerial photograph showing the location of the Post Substation and the proposed transmission line is attached to this Letter as Exhibit A.

5. The purpose of the transmission line work that is the subject of this Letter is to electrically connect the to-be-constructed Post Substation to the existing transmission grid. Doing so requires construction approximately 1/4 mile of transmission facilities, all located on PECO easements obtained from Sunoco Partners, and all within an industrial refinery.

IV. GENERAL DESCRIPTION OF THE LINE

52 Pa. Code § 52.72 (c)(3)

6. The general line construction needed for this project is to construct approximately 1/3 mile of new transmission facilities to connect the Post Substation to the transmission grid. The Post Substation will be located on land that is currently part of the Sunoco Partners' Marcus Hook Refinery, and which has been eased to PECO for this use. The subject transmission line will be comprised of seven towers – one inside the substation fence, two to traverse a portion of the industrial refinery to reach the existing transmission grid, and four on the existing transmission right-of-way to effect the electrical interconnection to the grid (See Exhibit A). The final towers along the existing transmission line right-of-way will be located in Lower Chichester Township, while the remainder of the line will be located in the Borough of Marcus

¹ Pursuant to the Municipalities Planning Code, 53 Pa. Statutes §10619, PECO is working with the Borough of Marcus Hook regarding local zoning laws and the construction of Post Substation.

Hook. The line will be constructed over easements obtained from Sunoco Partners and utilizing PECO's existing transmission line corridor.

V. SAFETY CONSIDERATIONS
52 Pa. Code § 52.72 (c)(6)

7. The design criteria used for the transmission line work described herein is set forth in the PECO's standards for transmission line construction. These design criteria meet or exceed the requirements of the National Electrical Safety Code ("NESC"). Furthermore, PECO will construct, operate and maintain the transmission facilities in a manner that satisfies or surpasses NESC standards. The proposed project will not create an unreasonable risk of danger to the public health or safety.

8. PECO has generally evaluated the electric and magnetic fields associated with this project, but has not conducted computer modeling of the fields. The subject transmission facilities will be located in an industrial area, within or immediately adjacent to the fenceline of a major oil refinery, on land owned by the refinery owner and eased to PECO, or briefly (for purposes of interconnection only) on an existing 230 kV transmission corridor. The refinery is currently flanked by the existing 230 kV transmission line; the subject transmission facilities will connect the existing transmission line to the newly-constructed substation. For these reasons, PECO does not expect changes to the public's magnetic field environment at this location.

PECO will obtain all necessary approvals from the Borough, and therefore does not require and is

VI. SITING AND ENVIRONMENTAL AND LAND USE IMPACTS

9. The functional requirements of the project require PECO to build this short line within an existing industrial refinery, and therefore PECO does not expect any environmental or land use impacts. Nonetheless, before it performs construction work, PECO will conduct an analysis of the presence/absence of wetlands for the project. Where wetlands are identified and access is required, they will be surveyed, marked in the field, and designated on drawings. Where access over wetlands is necessary to perform the construction work, PECO will utilize temporary mats or other approved or permitted methods to avoid damage. As a consequence of all of these factors, the transmission line construction proposed for approval herein will create minimal if any new environmental and land use impacts.

10. *Because this transmission project will be constructed within an industrial refinery,* PECO has worked closely with Sunoco Partners to identify and avoid all existing pipelines. No communications towers, pipelines or other utilities will be affected by the proposed transmission line. *Because the project involves construction on or immediately adjacent to an existing transmission line corridor, PECO has concluded that the proposed modifications will have no impact on any airports.* However, PECO will perform all necessary notifications and obtain all necessary permits to comply with FAA and airport requirements.

11. The proposed transmission line will have no significant environmental impacts. No unique geological, scenic or natural areas will be affected. All permits required for the construction and operation of this project will be obtained.

not seeking Commission approval for construction of the Post Substation itself.

12. Because the project involves construction on or immediately adjacent to an existing transmission line corridor and within the fence of an existing industrial refinery, PECO has concluded that no historical or archeological sites will be affected.

VII. COMMENCEMENT AND IN-SERVICE DATES
52 Pa. Code § 52.72(d)(4)(ii)

13. This project has a needed in-service date of August 31, 2016. In order to meet this in-service date, PECO needs to commence construction in October 2015.

**VIII. THE SIZE, CHARACTER, DESIGN AND CONFIGURATION OF
THE TRANSMISSION LINE MODIFICATION WILL NOT
SUBSTANTIALLY ALTER THE RIGHTS-OF-WAY**
52 Pa. Code §52.72(d)(4)(iii)

14. This Letter of Notification is filed pursuant to 52 Pa. Code §57.72(d)(1)(vi), and therefore PECO is not required to make a showing regarding whether the proposed construction will substantially alter the right-of-way. Nevertheless, PECO notes that, as explained in Section IV, above, this project will primarily be constructed within an existing industrial refinery. Therefore, the proposed construction will not substantially alter the area in which the line will be located.

IX. FILING DATE AND PUC PROCEDURES
52 Pa. Code § 52.72(d)(4)(iv)

15. This Letter of Notification is being filed on the date shown next to the signature block below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter

of Notification, PECO will be approved to perform the proposed transmission line modifications as proposed herein without the formal application process set forth at 52 Pa. Code § 57.71 *et seq.* If the Commission does not approve this Letter of Notification, the Commission's Order shall direct PECO to file for approval to construct the proposed project pursuant to the Commission's certification regulations for a full application.

X. SERVICE AND PUBLICATION

16. Copies of the Letter of Notification or Notices of Filing of the Letter of Notification are being served in accordance with 52 Pa. Code § 57.72(d)(3), as evidenced by the Certificate of Service being filed along with this Letter of Notification. Because this project is less than 1/4 mile in length and is located within an industrial refinery, PECO does not believe that additional public notice is necessary.

WHEREFORE, PECO Energy Company respectfully requests that the Commission approve the transmission line construction as proposed and described herein and, for the reasons set forth above.

Respectfully submitted,

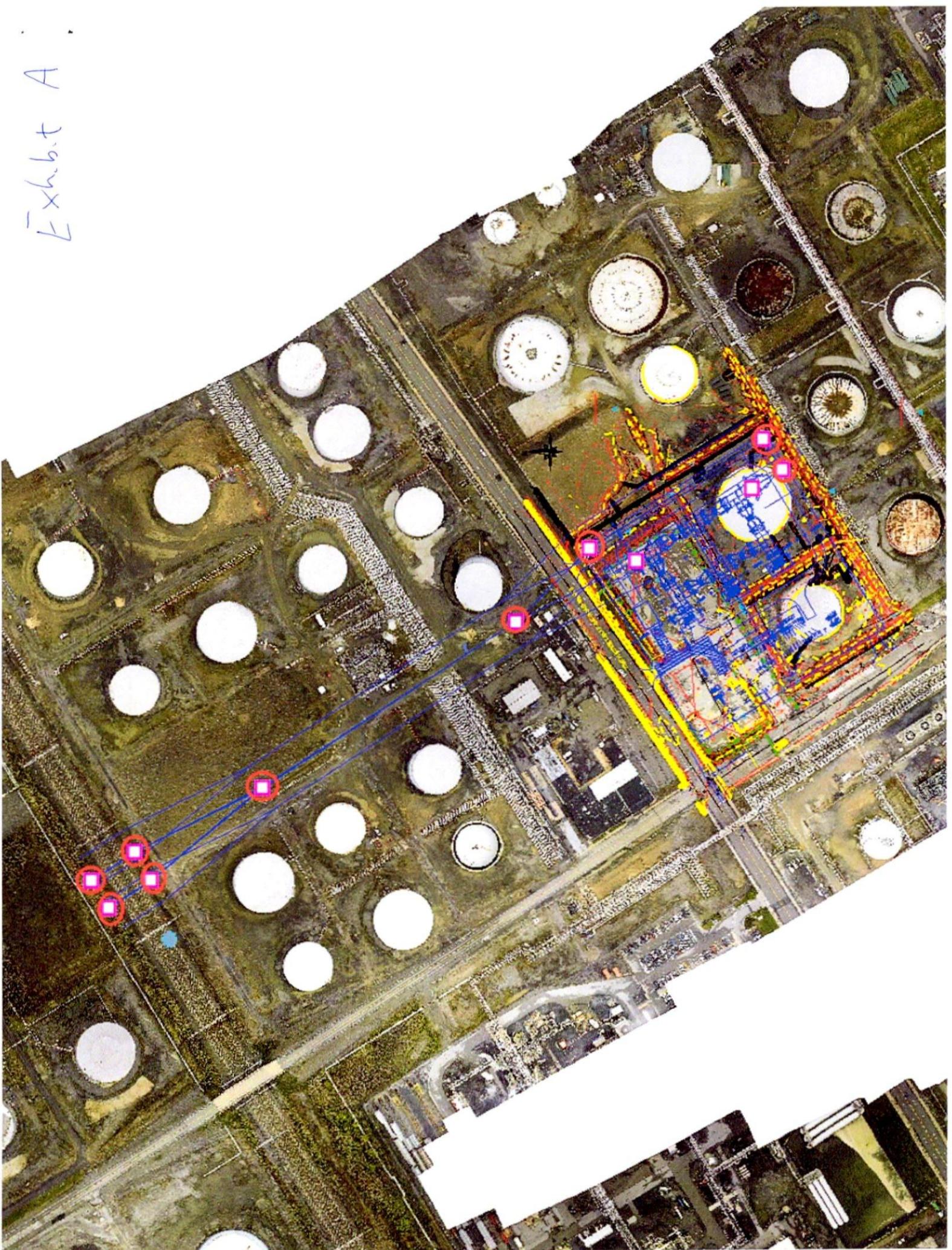


Attorney for PECO Energy Company

Dated: July 31, 2015

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Exhibit A



AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
 :
COUNTY OF PHILADELPHIA :
 :
)

SS

Richard G. Webster, being duly sworn according to law, deposes and says that he is Vice-President, Regulatory Policy and Strategy of PECO Energy Company; that he is authorized to and does make this affidavit for it; and that the facts set forth above are true and correct to the best of his knowledge, information and belief and he expects PECO Energy Company to be able to prove the same at hearing hereof.

RGW

Sworn to and subscribed
before me this 31st day
of July, 2015.




COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
LESLIE O' NEILL, Notary Public
City of Philadelphia, Phila. County
My Commission Expires April 2, 2019

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CERTIFICATE OF SERVICE

Copies of the above-referenced document have been served, first class mail return receipt requested, on the following:

Borough of Marcus Hook
10th and Green Street
Marcus Hook, PA 19061

Attn: Chief executive officer, governing body and the body charged with the duty of planning land use.

Frances T. Sbandi
102 Chesley Drive 1A,
Media, Pa. 19063

Solicitor for Lower Chichester Township

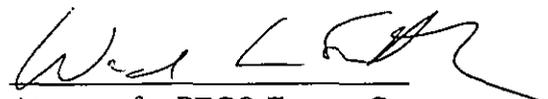
Attn: Chief executive officer, governing body and the body charged with the duty of planning land use.

The Department of Environmental Resources,
Attention: Bureau of Environmental Planning
Post Office Box 2357,
101 S. Second Street,
Harrisburg, Pennsylvania 17120

Secretary, Department of Transportation,
Room 1200 Transportation and Safety Building,
Harrisburg, Pennsylvania 17120

Chairman, Historical and Museum Commission,
Post Office Box 1026,
Harrisburg, Pennsylvania 17120

July 31, 2015



Attorney for PECO Energy Company

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