



An Exelon Company

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September 28, 2016

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: PUC Docket No. M-2009-2094773  
Rulemaking Re: Inspection, Maintenance, Repair, and Replacement Standards for  
Electric Distribution Companies, Pursuant to 52 Pa.Code § 57.198(a)

Dear Secretary Chiavetta:

In accordance with the Electric Service Reliability Standards at 52 Pa. Code Chapter 57.198, enclosed is PECO's Biennial Inspection, Maintenance, Repair and Replacement Plan for the period of January 1, 2018 through December 31, 2019.

PECO specifically requests continuation of a waiver from pole loading calculations under 52 Pa. Code §57.198(n)(2)(vi), approved by the Commission in prior years. This exemption does **not** include the additional directive to perform subsequent assessments of pole strength prior to attachment of non-company facilities, required per Secretarial Letter dated 12/22/2014.

Please acknowledge receipt of this Plan on the enclosed copy of this letter. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Webster".

cc: Office of Consumer Advocate  
Office of Small Business Advocate  
Darren Gill, Bureau of Technical Utility Services  
David Washko, Bureau of Technical Utility Services

Enclosure  
JAB/mec

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SECRETARY'S BUREAU



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**Biennial Inspection, Maintenance, Repair and Replacement Plan of  
PECO Energy Company Pursuant to 52 Pa.Code § 57.198(a)**

**For the period of January 1, 2018 – December 31, 2019**

**RECEIVED**

SEP 28 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Submitted by:  
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**Dated: October 1, 2016**

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## **List of Changes from 2016-2017 I&M Plan (by section)**

*NOTE: All page numbers referenced below refer to locations within the 2018-2019 Plan herein. Page numbers vary between this Plan and the prior 2016-2017 Plan.*

### **General**

- Added Table of Contents (Page 2).
- Added List of Changes from previous I&M Plan (current page).
- Updated data tables in all sections to reflect 2018-2019 targets (various).
- Updated inspection plans in all sections to reflect 2016-2017 performance as well as 2018-2019 targets (various).

### **Introduction**

- Added paragraph (Page 4, first paragraph).

### **Vegetation Management**

- Removed "34kV Overhang Program" description. Noted targeting of related circuits as part of core Vegetation Management Routine Pruning program.
- Added reference to increased vegetation management approved as part of PECO's 2015 electric rate case proceeding, Docket No. R-2015-2468981 (Page 5, final paragraph).

### **Distribution Wood Pole Inspections**

- Relocated request for continuance of waiver for load calculations from end of section to first page of section (now located on Page 7, section titled "Pole Loading Calculations").
- Added language to waiver request specifying exclusion of PUC requirement to assess pole strength prior to attachment of non-Company facilities and referenced PECO's 2016 start for said practice (Page 7, section titled "Pole Loading Calculations").

## Introduction

Pursuant to 52 Pa.Code § 57.98, PECO Energy Company (“PECO” or the “Company”) prepared this Biennial Inspection, Maintenance, Repair and Replacement Plan (the “Plan”) for the periodic inspection, maintenance, repair and replacement of facilities and with a purpose of meeting the Company’s reliability performance benchmarks and standards. The Plan documents the measures that the Company will take to comply with the relevant parts of Section 57.98 between January 1, 2018 and December 31, 2019.

## Plan Consistency

*Section 57.198 (b). Plan Consistency. The plan must be consistent with the National Electrical Safety Code, Codes and Practices of the Institute of Electrical and Electronics Engineers, Federal Energy Regulatory Commission Regulations and the provisions of the American National Standards Institute, Inc.*

All of PECO’s planned inspection, maintenance, repair, and replacement activities are consistent with the National Electrical Safety Code (NESC), Codes and Practices of the Institute of Electrical and Electronics Engineers (IEEE), Federal Energy Regulatory Commission (FERC) regulations, and the provisions of the American National Standards Institute, Inc. (ANSI) as applicable to the work performed.

## Recordkeeping

*Section 57.198 (m). Recordkeeping. An EDC shall maintain records of its inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair, and replacement programs as required by subsection (n). The records shall be made available to the Commission upon request within 30 days. Examples of sufficient records include:*

- (1) Date-stamped records signed by EDC staff who performed the tasks related to inspection.*
- (2) Maintenance, repair and replacement receipts from independent contractors showing when and what type of inspection, maintenance, repair or replacement work was done.*

PECO maintains records of its inspection, maintenance, repair, and replacement biennial plan activities in the form of date-stamped paper or electronic records with the name of the PECO staff member or approved contractor who performed the work.

## Vegetation Management

*Section 57.198(n)(1). Vegetation Management. The statewide minimum inspection and treatment cycle for vegetation management is between 4-8 years for distribution facilities. An EDC shall submit a condition-based plan for vegetation management for its distribution system facilities explaining its treatment cycle.*

### Program Description

The intent of PECO's Vegetation Management program is to ensure the safe and reliable delivery and operation of the electric distribution system. PECO's Vegetation Management program is primarily composed of a Distribution Preventive Maintenance Routine Pruning program in which all circuits on the PECO system are trimmed to specification once every five years. This core program, which now includes targeting of overhang on 34kV circuits, is complemented by the following programs that are intended to further improve reliability

- Hazard/Strategic Tree Removal Program – Primarily executed in conjunction with the Distribution Preventive Maintenance Routine Program. Intended to remove dead or declining trees along the conductor path and remove non compatible fast growing trees that are below or beside the line.
- Mid Cycle Program – Targets circuits which have experienced higher than average vegetation related interruptions and are in the third year of the five-year cycle. Focuses on trimming these circuits back to specification and removing any dead wood or declining trees along the conductor paths.
- Distribution Herbicide Program – Distribution circuits are treated on a three-year cycle to keep brush down and remove new growth below the conductors.

PECO employs a third-party utility line clearance contractor for all of its vegetation work. The non-herbicide work is executed through a combination of manual control methods including both hand tools and mechanical means such as mowers, equipment mounted saws and other devices. PECO's herbicide program uses selective basal herbicide applications, stem foliage applications and cut stubble applications.

The vegetation management activities identified in this Plan represent PECO's currently planned work. The Settlement Agreement approved as part of PECO's most recent electric rate case proceeding (Docket No. R-2015-2468981) allows PECO to recover an additional \$7.0 million in annual operating expenses (\$7.6 million including Gross Receipts Tax on the recovered expense amount) for increased vegetation management. PECO is currently planning the related work and will separately report on its status as required per the terms of the Settlement Agreement. As such, PECO has not included activities within that scope as part of this Plan.

Inspection Plan

|  | Area                      | Inspections and Treatments Planned |              |
|--|---------------------------|------------------------------------|--------------|
|  |                           | <i>(Total Line Miles – 12,970)</i> |              |
|  |                           | 2018                               | 2019         |
| <b>PECO</b><br><br>Total Miles<br>– 12,970 | Bucks/Montgomery Co.      | 1,377                              | 1,540        |
|  | Delaware/Chester/York Co. | 1,333                              | 647          |
|  | Philadelphia              | 106                                | 0            |
|  | <b>Total</b>              | <b>2,816</b>                       | <b>2,187</b> |

*Section 57.198(c). Time frames. The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Justification

Vegetation management activities are performed in accordance with the following:

- Generally accepted industry practices
- Compliant with ANSI Z133.1 and A-300 Standards

## **Distribution Wood Pole Inspections**

**Section 57.198(n)(2). Pole Inspections.** *Distribution poles shall be inspected at least as often as every 10 – 12 years except for the new southern yellow pine creosoted utility poles which shall be initially inspected within 25 years, then within 12 years annually after the initial inspection.*

*Pole inspections must include:*

- i. Drill tests at and below ground level*
- ii. A shell test*
- iii. Visual inspection for holes or evidence of insect infestation*
- iv. Visual inspection for evidence of unauthorized backfilling or excavation near the pole*
- v. Visual inspection for signs of lightning strikes*
- vi. A load calculation*

### Program Description

PECO visually inspects all distribution wood poles at least as often as every 10 – 12 years. This program is designed to extend the life of the wood pole infrastructure and to identify those poles that require replacement or reinforcement.

A full inspection will be performed on poles older than 12 years and includes:

- i. Drill tests at and below ground level
- ii. A shell test
- iii. Visual inspection for holes or evidence of insect infestation
- iv. Visual inspection for evidence of unauthorized backfilling or excavation near the pole
- v. Visual inspection for signs of lightning strikes

### Pole Loading Calculations

The Pennsylvania Public Utility Commission (the “Commission”) previously exempted PECO from conducting pole loading calculations as part of these inspections, originally effective with the approval of PECO’s 2012-2013 Biennial I&M Plan. *PECO requests a continuation of this exemption for the 2018-2019 period.*

When approving PECO’s 2016-2017 Plan, the Commission required PECO to assess pole strength prior to attaching non-Company facilities to its poles, per Secretarial Letter dated December 22, 2014, Docket No. M-2009-2094773. Such assessments require PECO to perform pole loading calculations. PECO began complying with this directive in 2016.

### Inspection Plan

1. PECO completed the 2016 program and exceeded its original plan. PECO planned to complete 32,763 wood pole inspections for the 2016 program. However, it actually completed 39,262 wood pole inspections in 2016.
2. PECO proposes to perform 32,833 inspections in 2018 and 32,834 in 2019.
3. PECO will continue to assess pole strength prior to attachment of non-Company facilities.

|  | Area   | Distribution Wood Pole Inspections |        |
|--|--|------------------------------------|--------|
|  |  | 2018                               | 2019   |
| <b>PECO</b><br>(394,002 total distribution wood poles) | PECO Service Area<br>394,002 total distribution wood poles | 32,833                             | 32,834 |

**Section 57.198(n)(3). Inspection Failure.** *If a pole fails the groundline inspection and shows dangerous conditions that is an immediate risk to public or employee safety or conditions affecting the integrity of the circuit; then the pole shall be replaced within 30 days of the date of inspection.*

Corrective Maintenance

If an inspector has reason to believe that any pole presents an imminent hazard to the public, the inspector immediately reports this condition to the PECO contract administrator and project manager. PECO ensures that such conditions are mitigated within 30 days. All remaining deficiencies are scheduled and prioritized based on criticality.

**Section 57.198(c). Time frames.** *The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Justification

The program cycle was determined based on industry practice. PECO is located in decay severity zone 3 per the U.S. Department of Agriculture's RUS Bulletin 1730B-121, 2013. Such industry data indicates that pole life extension is achieved if a pole requiring treatment is treated every 10 - 12 years. An effective treatment program will extend the life of a typical pole from 45 to 65 years.

## **Distribution Overhead Line Inspections**

**Section 57.198(n)(4). Distribution overhead line inspections.** *Distribution lines shall be inspected by ground patrol a minimum of once every 1 – 2 years. A visual inspection must include checking for:*

- i. Broken insulators*
- ii. Conditions that may adversely affect operation of the overhead distribution line*
- iii. Other conditions that may adversely affect operation of the overhead distribution line*

### Program Description

PECO inspects primary distribution overhead lines and equipment up to fused rear property portions a minimum of once every 1 – 2 years. The purpose of this program is to identify and repair conditions that may adversely affect reliability, safety and/or environment. To support various analyses, additional data is gathered on an as-needed basis. As referenced in Sections 57.198(n)(6) and 57.198(n)(7), overhead transformers and single-phase reclosers are inspected as a part of this program.

The program consists of visual inspections that identify defective equipment including:

- i. Broken insulators
- ii. Conditions that may adversely affect operation of the overhead distribution line
- iii. Other conditions that may adversely affect operation of the overhead distribution line

### Inspection Plan

1. PECO exceeded its planned inspections for 2016. The Company inspected all distribution circuits (1,932) in 2016 as opposed to the planned number of circuits to inspect in 2016 (966).
2. PECO proposes to perform 972 inspections in 2018 as well as in 2019.



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Distribution Overhead Line Inspections

|                                | Area  | Overhead Line Inspections<br>(1,944 total circuits) |      |
|--------------------------------|---|---|------|
|                                |   | 2018  | 2019 |
| PECO<br>(1,944 total circuits) | Bucks/Montgomery Co.<br>689 total circuits      | 344   | 345  |
|                                | Delaware/Chester/York Co.<br>592 total circuits | 296   | 296  |
|                                | Philadelphia<br>663 total circuits              | 332   | 331  |
|                                | Total   | 972   | 972  |

Section 57.198(n)(5). Inspection Failure. If critical maintenance problems are found that affect the integrity of the circuits, they shall be repaired or replaced no later than 30 days from discovery.

Corrective Maintenance

Maintenance problems vary in nature and criticality. Safety hazards and environmental issues are reported immediately to the Operations Center for emergent repair. An emergent repair is defined as Priority 10 or 20 work which shall be repaired or mitigated in a brief amount of time, less than 30 days.

Section 57.198(c). Time frames. The plan must comply with the inspection and maintenance standards in subsection (N). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (N). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.

Justification

Section 12.121 (A) of the NESC states that "Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary." PECO's distribution system consists of many aerial and distribution cable facilities, which are exposed to physical, electrical and environmental stresses. To ensure the safe and reliable operation of the system, it must be periodically maintained and inspected. Effectiveness reviews have shown that the established 1-2 year inspection program has successfully lowered customer outages caused by aerial equipment failures, therefore improving customer reliability.

## **Distribution Transformer Inspections**

**Section 57.198(n)(6). Distribution transformer inspections.** *Overhead distribution transformers shall be visually inspected as part of the distribution line inspection every 1 – 2 years. Above-ground pad-mounted transformers shall be inspected at least as often as every 5 years and below-ground transformers shall be inspected at least as often as every 8 years. An inspection must include checking for:*

- i. Rust, dents or other evidence of contact*
- ii. Leaking oil*
- iii. Installation of fences or shrubbery that could adversely affect access to and operation of the transformer*
- iv. Unauthorized excavation or changes in grade near the transformer*

### Program Description

PECO visually inspects overhead distribution transformers as part of the overhead line inspections, per Section 57.198(n)(4). Pad-mount transformers are visually inspected at least as often as every 5 years and below-ground transformers are visually inspected at least as often as every 8 years. These inspections are designed to identify defective equipment and structures that could affect system reliability.

Visual inspections are intended to identify abnormal conditions including:

- i. Rust, dents or other evidence of contact
- ii. Leaking oil
- iii. Installation of fences or shrubbery that could adversely affect access to and operation of the transformer
- iv. Unauthorized excavation or changes in grade near the transformer

### Inspection Plan

1. PECO is projecting to exceed the planned distribution transformer inspections for 2016.
2. PECO proposes to perform 11,244 inspections in 2018 and 11,246 inspections in 2019.

|  | Area   | Type  | Transformer Inspections Planned |               |               |
|--|--|---|---------------------------------|---------------|---------------|
|  |  |   | 61,101 total transformers       |               |               |
|  |  |   | 2018                            | 2019          |               |
| <b>PECO</b><br>61,101 total transformers | Bucks/Montgomery Co.<br>(28,170 total transformers)      | Pad-mounted Trans.<br>(22,885 total transformers) | 4,577                           | 4,577         |               |
|  |  | Below-ground Trans.<br>(5,285 total transformers) | 661                             | 661           |               |
|  | Delaware/Chester/York Co.<br>(25,968 total transformers) | Pad-mounted Trans.<br>(20,012 total transformers) | 4,002                           | 4,003         |               |
|  |  | Below-ground Trans.<br>(5,956 total transformers) | 745                             | 744           |               |
|  | Philadelphia<br>(6,963 total transformers)               | Pad-mounted Trans.<br>(5,191 total transformers)  | 1,038                           | 1,039         |               |
|  |  | Below-ground Trans.<br>(1,772 total transformers) | 221                             | 222           |               |
|  | <b>Total</b>   |   |                                 | <b>11,244</b> | <b>11,246</b> |

*Section 57.198(c). Time frames. The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

Justification

Section 12.121 (A) of the NESC states that "Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary." The practice of performing the established cycles is based on effectiveness reviews and industry practice. Such reviews have confirmed that the transformer inspection program has a positive impact in customer reliability.

## Recloser Inspections

**Section 57.198(n)(7). Recloser Inspections.** *Three-phase reclosers shall be inspected on a cycle of 8 years or less. Single-phase reclosers shall be inspected as part of the EDC's individual distribution line inspection plan.*

### Program Description

PECO visually inspects single phase reclosers through the Distribution Overhead Line Inspection Program, per Section 57.198(n)(4).

PECO visually inspects and tests three-phase reclosers on a cycle of eight years or less. Duty cycle readings, settings and circuit print accuracy are also verified.

### Inspection Plan

1. PECO is projecting to exceed the planned recloser inspections for 2016.
2. PECO proposes to perform 216 inspections in 2018 and 215 inspections in 2019.

|   | Area  | Three-Phase Recloser Inspections |            |
|---|---|----------------------------------|------------|
|   |   | 1,724 total reclosers            |            |
|   |   | 2018                             | 2019       |
| <b>PECO</b><br>1,724 total<br>reclosers | Bucks/Montgomery Co.<br>(590 total reclosers)     | 74                               | 74         |
|   | Delaware/Chester/York Co<br>(765 total reclosers) | 96                               | 95         |
|   | Philadelphia<br>(369 total reclosers)             | 46                               | 46         |
|   | <b>Total</b>                                      | <b>216</b>                       | <b>215</b> |

**Section 57.198(c). Time frames.** *The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will support the level of reliability required by law.*

### Justification

Section 12.121 (A) of the NESC states that "Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary." The practice of performing the established cycles is based on PECO's experience on recloser performance. Inspecting three-phase reclosers per the established cycles can prevent misoperations and will save customer interruptions during events, thus improving reliability to the customers.

## **Substation Inspections**

**Section 57.198(n)(8). Substation inspections.** *Substation equipment, structures and hardware shall be inspected on a cycle of 5 weeks or less.*

### Program Description

PECO inspects its substations every 5 weeks with an allowable grace period of 25% of the task interval, which for this periodicity is 8 days. The grace period is provided to allow for scheduling efficiency and emergency response to equipment failures and storms. The purpose of these inspections is to capture and trend readings and perform visual inspections of the substation yard and equipment. These inspections help to ensure that any developing substation problems are identified and addressed in a timely manner to support system reliability and electrical safety. The data from these inspections is captured and trended in an equipment database.

Each inspection is customized to the equipment installed in the substation/switchyard and, based on the equipment, includes the following types of readings and inspections:

- Read and record currents, voltages, watts, vars, MVAs, temperatures, pressures, operations counters, run-hours, levels, and specific gravity readings.
- Substation control house inspection (security breaches, general housekeeping).
- Substation yard and perimeter (gate, locks, fence, signage)
- Substation equipment
- Batteries and chargers
- Relays
- Station service power equipment

### Inspection Plan

Inspections are divided into two basic categories for tracking purposes since they are completed by different work groups. Substations which represent PECO's transmission and distribution substations are typically larger and contain DC systems. Unit Substations represent smaller distribution substations (from 33 or 13 kV to 2.4, 4 or 13 kV), and do not contain DC systems.



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*Substation Inspections*

| PECO   | Area  | Substation Inspections Planned |             |
|--|---|--------------------------------|-------------|
|  |   | 2018                           | 2019        |
|  | <i>Total Substations</i>  | 437                            | 432         |
| <i>Substations (134)</i>                           | Bucks/Montgomery Co<br>(36 substations)                                   | 360                            | 360         |
|  | Delaware/Chester/York /<br>Hartford Co (MD)<br>(46 substations)           | 460                            | 460         |
|  | Philadelphia<br>(52 substations)  | 520                            | 520         |
|  | <b>Total</b>  | <b>1340</b>                    | <b>1340</b> |
| <i>Unit Substations (303 in 2018, 298 in 2019)</i> | Bucks/Montgomery Co<br>(133/129 unit substations)                         | 1330                           | 1290        |
|  | Delaware/Chester/York /<br>Hartford Co (MD)<br>(136/135 unit substations) | 1360                           | 1350        |
|  | Philadelphia<br>(34 unit substations)                                     | 340                            | 340         |
|  | <b>Total Inspections</b>  | <b>3030</b>                    | <b>2980</b> |

*Section 57.198(c) Time Frames. The plan must comply with the inspection and maintenance standards in subsection (n). A Justification for the inspection and maintenance time frames selected shall be provided, even if the time frame falls within the intervals prescribed in subsection (n). However and EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provide that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support and alternative approach that will support the level of reliability required by law.*

Justification

The practice of performing 5-week substation inspections with an allowed grace period of 25% is based on accepted utility practices and the basis for the various inspection tasks are captured and documented on the individual Preventative Maintenance templates associated with each substation component. Historically, a period of 5 to 6 weeks between substation inspections has been utilized and has proven to be effective at identifying and addressing developing substation or equipment issues in a timely manner in support of system reliability and electrical safety. The effectiveness of the inspections is periodically reviewed at a component level and as part of event investigations. Adjustments are made to the program as warranted to improve system reliability and safety as a result of the reviews. In addition, there are many opportunities for other PECO personnel or approved PECO vendors to view substation facilities in the course of their day to day work in and around the substations such as facilities maintenance inspections and switching and blocking being performed for scheduled and emergent work.

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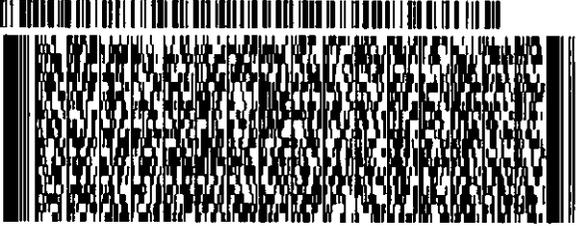
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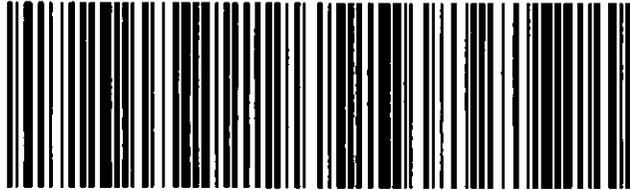


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