



An Exelon Company

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January 4, 2019

**VIA E-FILE & FIRST CLASS MAIL**

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

**RE: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement  
v. PECO Energy Company (MAOP Settlement Agreement – 30 Day Reporting  
Requirements)  
Docket No. C-2015-2511928**

Dear Ms. Chiavetta:

**BACKGROUND**

On August 8, 2018, PECO Energy Company (“PECO”) and the Pennsylvania Public Utility Commission’s (the “Commission”) Bureau of Investigation and Enforcement (“I&E”) filed a Joint Petition for Settlement (“Settlement”) with the Commission (in the above-referenced proceeding). The Settlement represented a comprehensive resolution of all issues in the case. On October 26, 2018, Administrative Law Judge Christopher P. Pell (“ALJ Pell”) issued a Recommended Decision finding that the Settlement was reasonable and should be approved in its entirety by the Commission. On December 6, 2018, the Commission issued an Order adopting ALJ Pell’s Recommended Decision in its entirety without modification.

Pursuant to the terms of the Settlement, PECO agreed to (among other things) perform certain system enhancements and provide implementation plans for such enhancements to the Commission’s Safety Division within thirty (30) days of the issuance of a final Commission Order. PECO hereby provides the following implementation plans and status updates in accordance with the 30-day reporting requirement contained in the Settlement.

**IMPLEMENTATION PLAN FOR RELIEF VALVE REPLACEMENTS**

According to Chapter VI. *Terms and Conditions of Settlement*, Section A. *Specific Settlement Provisions*, Paragraph 26A, PECO agreed to the following:

- A. PECO shall install *Series 20 Pilots for Grove Relief Valves* (or equivalent models) at 57 medium pressure regulator stations. PECO will submit a plan to the Safety Division within 30 days of a final Commission Order approving this Settlement. Within 15 months after the date of entry of a final Commission Order approving the Settlement in its entirety without modification or amendment, PECO will complete the work described in this paragraph.

PECO’s Gas Regulatory Compliance Group plans to complete installation of all Series 20 Pilots for Grove Relief Valves (or equivalent) at 57 medium pressure regulator stations in 2019. Enclosed with this letter (Exhibit A) is the tracking sheet that PECO will use to document installation progress throughout 2019.

**IMPLEMENTATION PLAN FOR LOWERING RELIEF VALVE SET POINTS**

According to Chapter VI. *Terms and Conditions of Settlement*, Section A. *Specific Settlement Provisions*, Paragraph 26B, PECO agreed to the following:

- B. PECO shall lower the set points of relief valves at 41 existing medium pressure regulator stations by 2 psig. PECO will submit a plan to the Safety Division within 30 days after the date of entry of a final Commission Order approving the Settlement in its entirety without modification or amendment. Within 15 months of the date of entry of a final Commission Order approving the Settlement in its entirety without modification or amendment, PECO will complete the work described in this paragraph.

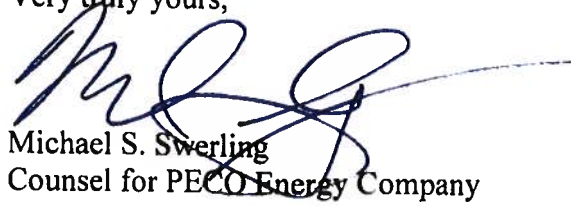
The following table provides a status update on lowering the set points of relief valves as 41 existing medium pressure regulator stations by 2 psig. PECO began this work in 2018 and will complete it in 2019 (not to exceed 15 months).

Relief Set Point Changes	
Starting Total	41
Completed in 2018	36
To be completed in 2019	5

Enclosed with this letter (Exhibit B) is the tracking sheet that PECO is using to document work progress. Exhibit B provides detail regarding work location and completion dates.

If you have any questions, feel free to call me directly at (215) 841-4220.

Very truly yours,

A handwritten signature in black ink, appearing to read 'MSW', with a long horizontal flourish extending to the right.

Michael S. Swerling  
Counsel for PECO Energy Company

Enclosures

Cc: Paul J. Metro, Manager, Safety Division

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY</b>	:	
<b>COMMISSION, BUREAU OF</b>	:	
<b>INVESTIGATION AND</b>	:	
<b>ENFORCEMENT</b>	:	
<b>Complainant</b>	:	<b>DOCKET NO. C-2015-2511928</b>
	:	
<b>v.</b>	:	
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**CERTIFICATE OF SERVICE**

I, Michael S. Swerling, hereby certify that I have this day served a copy of the MAOP Settlement Agreement – Thirty Day Reporting Requirement Letter in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
2<sup>nd</sup> Floor, 400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105

Michael L. Swindler, Deputy Chief Prosecutor  
Bradley R. Gorter, Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Dated: January 4, 2019


  
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Exhibit A-MAOP Settlement (Relief Valve Replacements)  
December 31, 2018 Update

DIVISION	STATION ID	STATION LOCATION	Existing Relief Pilot	New Relief Pilot	WEEK COMPLETED
GDMONT	0108	2ND ST S/O CTR AV-SOUDERTON COM STA	829S	Series 20S	
GDMONT	0151	SOUTH KEIM ST & SCHUYLKILL RD	829S	Series 20S	
GDMONT	0058	W. RIDGE PIKE & FRUITVILLE RD	829S	Series 20S	
GDMONT	0154	CHURCH & MEETINGHOUSE RDS	829S	Series 20S	
GDMONT	0004	TROOPER RD & RIDGE PIKE	829S	Series 20S	
GDMONT	0054	CROOKED LANE S/O BARNES ST.	829S	Series 20S	
GDMONT	0030	PARK & 2ND AVES	829S	Series 20S	
GDMONT	0129	WASHINGTON LA & CEDAR ST	829S	Series 20S	
GDMONT	0029	GERMANTOWN PK AT PLYMOUTH MTG MALL	829S	Series 20S	
GDMONT	0011	SPRING & CEDAR LANE	829S	Series 20S	
GDMONT	0008	MOOREHEAD AVE AT FRONT ST	829S	Series 20S	
GDMONT	0045	ORELAND GAS PLANT	829S	Series 20S	
GDMONT	0084	STENTON AVE W/O FLOURTOWN RD	829S	Series 20S	
GDMONT	0086	PAPER MILL & CHURCH RDS.	829S	Series 20S	
GDMONT	0020	BUTLER PK E/O GERMANTOWN PK	829S	Series 20S	
GDMONT	0055	EGYPT & TROOPER ROADS	829S	Series 20S	
GDMONT	0078	GRAVEL PK & BLOMMER DR	829S	Series 20S	
GDMONT	0048	HENDERSON RD S/O DEEP HOLLOW RD	829S	Series 20S	
GDMONT	0104	PAPERMILL RD N/O CHELTENHAM AVE	829S	Series 20S	
GDMONT	0010	HANNA AVE & GERMANTOWN PK	829S	Series 20S	
GDBUX	0098	GREEN LANE & WILSON AVE	829S	Series 20S	
GDBUX	0034	LINDEN & MIFFLIN	829S	Series 20S	
GDMONT	0071	WARMINSTER & FULMER RDS,FULMER HTS.	829S	Series 20S	
GDBUX	0011	W. Trenton Ave and Valerie Rd	829S	Series 20S	
GDBUX	0078	LINCOLN HWY & OLDS BLVD	829S	Series 20S	
GDBUX	0054	WINDING WAY & L.MAKEFIELD RD.	829S	Series 20S	
GDBUX	0008	PINE ST N/O MANOR AVE	829S	Series 20S	
GDBUX	0027	OXFORD VALLEY & ROELOFS RD.	829S	Series 20S	
GDBUX	0002	HOUSTON RD & NEWTOWN-YARDLEY RD	829S	Series 20S	
GDBUX	0050	S.PENNA AVE & LINCOLN HWY	829S	Series 20S	
GDMONT	0060	W.BROAD ST & PENNA AVE	829S	Series 20S	
GDCHES	0015	MEREDITH & MULBERRY STS.	829S	Series 20S	
GDCHES	0018	MARYLAND AVE & BRANDYWINE STREET	829S	Series 20S	
GDDEL	0196	MONTGOMERY AVE & OWEN RD	829S	Series 20S	
GDCHES	0101	SUGARTOWN RD & PAOLI PK	829S	Series 20S	
GDCHES	0102	MORELAND RD S/O KING ST	829S	Series 20S	
GDCHES	0006	VALLEY RD & GREEN ST,WESTWOOD	829S	Series 20S	
GDCHES	0035	RT 724 & ARCH ST	829S	Series 20S	
GDCHES	0016	WEST 1ST AVE W/O SOUTH GAY ST	829S	Series 20S	
GDCHES	0024	EAST MAIN ST N/O RIDGE AVE	829S	Series 20S	
GDDEL	0101	3RD & GOV. PRINTZ	829S	Series 20S	
GDDEL	0092	BAILEY ROAD E/O LANSDOWNE AVE	829S	Series 20S	
GDDEL	0079	6TH & MAIN STS	829S	Series 20S	
GDDEL	0133	OLD BALTIMORE PK & SCHOOL LA	829S	Series 20S	
GDDEL	0017	OAK LANE N/O PROVIDENCE RD.	829S	Series 20S	
GDCHES	0004	FRANKLIN & MARSHALL STS	829S	Series 20S	
GDDEL	0091	BROOKHAVEN RD S/O PROVIDENCE AVE	829S	Series 20S	
GDDEL	0153	OLD GULPH RD & MONTGOMERY AVE	829S	Series 20S	
GDDEL	0178	AIRDALE & MONTROSE	829S	Series 20S	
GDCHES	0021	E. STATE & SCHOOL HOUSE RDS	829S	Series 20S	
GDCHES	0023	CHESTNUT ST S/O ACORN LA	829S	Series 20S	
GDDEL	0008	CHESTER RD & SWARTHMORE COLLEGE	829S	Series 20S	
GDDEL	0167	KINGSTON & GARRETT RDS.	829S	Series 20S	
GDDEL	0065	3RD & OLIVE ST	829S	Series 20S	
GDDEL	0113	MEDIA LINE ROAD & LOVELL AVENUE	829S	Series 20S	
GDDEL	0097	EAST WYNNEWOOD & LATCHES LANE	829S	Series 20S	
GDDEL	0080	RIDGE ROAD E/O CHESTNUT ST.	829S	Series 20S	

Exhibit B-MAOP Settlement (Lowering Relief Valve Set Points)  
December 31, 2018 Update

DIVISION	STATION ID	STATION LOCATION	Original Relief Set Pressure	New Relief Set Pressure	WEEK COMPLETED
GDMONT	0067	Moser & High Sts	26	24	10/25/2018
GDMONT	0050	MAIN ST E/O FIRST AVE	23	21	10/25/2018
GDMONT	0005	ELM & CHERRY STS	23	21	10/30/2018
GDMONT	0152	FAIRWAY RD.	26	24	8/18/2018
GDMONT	0017	GERMANTOWN PK E/O TROOPER RD	23	21	10/31/2018
GDMONT	0087	BROAD E/O BLAIN AVE.	26		
GDMONT	0006	FRONT & FORD ST	23	21	10/31/2018
GDMONT	0056	MEADOWBROOK RD & BUTLER PK	26	24	10/13/2018
GDMONT	0066	UPPER INDIAN HEAD & WINDING RIDGE	23	19	8/22/2018
GDMONT	0061	WARTMAN & BUYERS RDS	23	21	8/14/2018
GDMONT	0025	ANTHONY LA & KEEBLER RD	23	21	8/20/2018
GDMONT	0022	MILL RD S/O EGYPT RD	21	19	8/27/2018
GDMONT	0080	ROUTE #202 N/O SUMNEYTOWN PK	26	24	8/31/2018
GDMONT	0079	MORRIS RD W/O PRIMROSE RD	26	24	8/18/2018
GDMONT	0016	BUTLER PK N/O SKIPPACK PK	22	20	10/2/2018
GDMONT	0026	SKIPPACK PK & PLANK RD	23	21	10/4/2018
GDBUX	0007	TREVOSE & STREET ROADS	26	24	11/1/2018
GDBUX	0618	BEAVER DAM RD.	21	19	10/29/2018
GDBUX	0041	GREEN & MAPLE STS.	26	24	10/29/2018
GDBUX	0079	OXFORD VALLEY RD & OLDS BLVD	26		
GDMONT	0089	ORANGEMANS RD S/O EXTON RD,HATBORO	26	24	8/18/2018
GDDEL	0108	CONSHOHOCKEN STATE & MILL CREEK	26	24	12/11/2018
GDCHES	0011	17TH AVE & OLIVE ST	31	29	12/11/2018
GDCHES	0003	SUBSTATION ALLEY E/O RT 52	26	24	12/11/2018
GDDEL	0192	RAYNHAM RD & CITY LINE AVE	31	29	12/11/2018
GDCHES	0036	CENTER & MELLON STS.	21	19	12/11/2018
GDCHES	0013	NEW ST & WAYNE ST	26	24	12/11/2018
GDDEL	0051	BELMONT & ARLINGTON AVES.	26		
GDDEL	0094	BONSALL & FAIRVIEW AVES	26		
GDDEL	0024	HALL DRIVE & PENNELL RD.	26	24	12/11/2018
GDDEL	0143	NAAMANS CREEK & GARNET MINE RDS	26	24	12/11/2018
GDDEL	0064	LARKIN RD & CHICHESTER AVE	26	24	12/11/2018
GDCHES	0014	ROSEHILL & MYRTLE AVES	26	24	12/11/2018
GDDEL	0021	WESLEY & SPROUL RDS	26	24	12/11/2018
GDDEL	0105	BREENTWOOD & EARLINGTON RDS.	31	29	12/11/2018
GDDEL	0158	FAIRVIEW & PARK	26	24	12/11/2018
GDDEL	0030	BALTIMORE PK & LEAMY AVE	26		
GDDEL	0177	GARRETT RD & SHERBROOK BLVD	26	24	12/11/2018
GDDEL	0005	OLD MIDDLETOWN RD & CHURCH RD	26	24	12/11/2018
GDDEL	0068	OLD MIDDLETOWN RD S/O KNOWLTON RD	26	24	12/11/2018
GDDEL	086M	MARSHALL RD & LONG LANE	26	24	12/11/2018