

**PENNSYLVANIA PUBLIC UTILITY COMMISSION
HARRISBURG, PENNSYLVANIA 17105**

**Letter of Notification of PECO
Energy Company to Construct a
230 kV Transmission Line Tap
from the existing Parish-Bala
Cynwyd 230 kV Transmission
Line to Upland Substation in the
City of Philadelphia,
Pennsylvania**

**Public Meeting: October 24, 2019
3012631-TUS
Docket No. A-2019-3012631**

STATEMENT OF COMMISSIONER ANDREW G. PLACE

Before the Commission for consideration is the Letter of Notification (LON) of PECO Energy Company (PECO or Company) for approval to construct a 230kV Transmission Line Tap from the existing Parish-Bala Cynwyd 230 kV transmission line to the Upland Substation in Philadelphia.

While I support the approval of this LON and construction of the Line Tap, accounting treatment and cost recovery for this project are yet to be addressed. More specifically, I encourage the statutory advocates, the Bureau of Investigation and Enforcement, and other affected parties to closely scrutinize the costs of this project. PECO has estimated the cost of this project to be \$7.1 million for this 0.6-mile double circuit tap line. Material costs for the eight poles, appurtenances and conductors are expected to be less than \$1 million, with labor costs representing the remainder of the project's costs. While it is asserted that the construction on and around an active SEPTA rail line will impose added costs, these costs bear further scrutiny. I ask parties to explore whether such costs are justified and ask the Company to work with SEPTA and the City of Philadelphia to mitigate these high labor costs where possible, while assuring the safety of its workers.

DATE: October 24, 2019



Andrew G. Place, Commissioner