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March 6, 2020

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

RE: PECO Energy Company's Pilot Plan for an Advance Payments Program and Petition for Temporary Waiver of Portions of the Commission's Regulations with Respect to that Plan

Docket No. P-2016-2573023

Dear Ms. Chiavetta:

On December 19, 2019, the Commission issued an Opinion and Order in this proceeding in which it approved PECO to proceed with a two-year advance payment pilot program (the "Prepay Plan"). The Commission's December Opinion and Order requires certain modifications to PECO's initial proposal. In addition, the Commission's December Opinion and Order states that PECO will have a six-month period (nominally, until mid-June 2020) to collaborate with interested parties regarding certain aspects of the Prepay Plan. The December Opinion and Order also allows PECO two additional months after the collaborative period (nominally, until mid-August 2020) to prepare and file its modified Prepay Plan. Finally, the December Opinion and Order establishes a 45-day post-filing procedure (nominally, until the end of September 2020) for Exceptions and Reply Exceptions.

Under that schedule, PECO's modified Prepay Plan thus would next come before the Commission for further Commission evaluation in approximately October 2020. At some point thereafter, the Commission would issue an Order approving, denying, or further modifying PECO's modified Prepay Plan. After the Commission issues that subsequent additional Order regarding the modified Prepay Plan, if a party is still aggrieved, that party would have access to the appeal process of the Commonwealth Court, likely through 2021 or into 2022.

After more than three years of litigation in this docket, PECO believes that, even with the modifications required by the Commission's December 19, 2019 Opinion and Order, substantial disagreement remains between PECO and the interested parties as to whether, and in what form, a Prepay Plan should proceed. PECO thus anticipates that, even after good faith collaboration, it is likely that the Prepay Plan would continue to be litigated for the foreseeable future.

PECO recognizes that the Commission and the other interested parties put significant effort into this docket. PECO greatly appreciates that effort and that the Commission approved it to move

forward with a modified Prepay Plan. However, PECO has concluded that it should not further tax the resources of the Commission, PECO, and the interested parties to pursue a Prepay Plan at this time.

Very truly yours,

A handwritten signature in black ink, appearing to read "Row" followed by a long horizontal flourish.

Richard G. Webster
Vice-President
Regulatory Policy & Strategy
PECO Energy Company

cc: Chairman Gladys Brown Dutrieulle
Vice Chairman David W. Sweet
Commissioner Andrew G. Place
Commissioner John F. Coleman, Jr.
Commissioner Ralph V. Yanora
Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PECO Energy Company's Pilot Plan for an	:	
Advance Payments Program Submitted Pursuant	:	
To 52 Pa. Code §56.17 and PECO Energy	:	Docket No. P-2016-2573023
Company's Petition for Temporary Waiver	:	
Of Portions of the Commission's Regulations	:	
With Respect to that Plan	:	

CERTIFICATE OF SERVICE

I, Ward L. Smith hereby certify that on March 6, 2020, I served a copy of PECO Energy Company's Status Letter upon all interested parties via email to:

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Dated: March 6, 2020



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