



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

August 21, 2020

**Via Electronic Filing**

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

Re: Petition of PECO Energy Company for Approval of Its Electric Long Term Infrastructure Improvement Plan for the Period January 1, 2021 through December 31, 2025  
Docket No. P-2020-3020974  
**I&E Letter In Lieu of Formal Comments**

Dear Secretary Chiavetta:

In lieu of formal comments, the Bureau of Investigation and Enforcement (“I&E”) submits this letter requesting PECO to provide clarity on issues identified in its Petition for Approval of PECO’s Second Electric Long Term Infrastructure Improvement Plan (“Petition”). By way of background, PECO filed its Petition on July 22, 2020 and if approved would be effective for the period from January 1, 2021 through December 31, 2025. To date, no comments have been filed in response to PECO’s Petition.

To be clear, I&E’s letter is not recommending that this Petition be assigned to the Commission’s Office of Administrative Law Judge (“OALJ”); however, I&E’s Electric Safety Division is seeking clarification on the following:

- Please provide a list of the 10-25 projects proposed to be completed under the *Ariel Infrastructure Resiliency Areas Program* and a breakdown of the 28,800 to 33,800 assets to be replaced through the *Ariel Infrastructure Resiliency Target Assets Program* referenced on page 33 of PECO’s proposed LTIP.
- Referencing pp. 46-47 of PECO’s proposed LTIP:
  - What analysis was performed to determine the type and vintage of cables that are expected to have higher rates of failure to be replaced first?; and
  - Was an analysis performed to determine the type and vintage of cable conduit needed to be replaced, specifically the fiber duct conduit also known as “Orangeburg” fiber duct?

I&E requests PECO provide responses to the questions above by September 10, 2020.

Copies of this letter are being served on parties of record per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic Service.* Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Erika L. McLain".

Erika L. McLain  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 320526  
(717) 783-6170  
[ermclain@pa.gov](mailto:ermclain@pa.gov)

ELM/ac  
Enclosure

cc: Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :  
Approval of Its Electric Long Term : Docket No.: P-2020-3020974  
Infrastructure Improvement Plan for the Period :  
January 1, 2021 through December 31, 2025 :

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **I&E Letter in Lieu of Formal Comments** dated August 21, 2020, in the manner and upon the persons listed below.

**Served via Electronic Mail Only**

Richard G. Webster, Jr.  
Vice President  
PECO Energy Company  
2301 Market Street, S15  
Philadelphia, PA 19103  
[dick.webster@peco-energy.com](mailto:dick.webster@peco-energy.com)

John R. Evans  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor, Forum Place  
Harrisburg, PA 17101  
[jorevan@pa.gov](mailto:jorevan@pa.gov)

Tanya J. McCloskey, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[tmccloskey@paoca.org](mailto:tmccloskey@paoca.org)

Scott J. Rubin, Esq.  
333 Oak Lane  
Bloomsburg, PA 17815-2036  
[scott.j.rubin@gmail.com](mailto:scott.j.rubin@gmail.com)  
*Counsel for IBEW*

Charis Mincavage, Esq.  
Adeolu Bakare, Esq.  
McNees Wallace & Nurick LLC  
P.O. Box 1166  
100 Pine Street  
Harrisburg, PA 17101-1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
*Counsel for PAIEUG*

Paul T. Diskin, Director  
Bureau of Technical Utility Services  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[pdiskin@pa.gov](mailto:pdiskin@pa.gov)

Gregory W. Tillman  
Walmart Inc.  
2001 Southeast 10<sup>th</sup> Street  
Bentonville, Arkansas 72716-5530  
[greg.tillman@walmart.com](mailto:greg.tillman@walmart.com)

Charles T. Joyce, Esq.  
Spear Wilderman, P.C.  
230 South Broad Street, Suite 1400  
Philadelphia, PA 19102  
[ctjoyce@spearwilderman.com](mailto:ctjoyce@spearwilderman.com)  
*Counsel for IBEW*

Donald R. Wagner, Esq.  
Linda R. Evers, Esq.  
Michael A. Gruin, Esq.  
Stevens & Lee  
111 N. Sixth Street  
Reading, PA 19601  
[drw@stevenslee.com](mailto:drw@stevenslee.com)  
[lr@stevenslee.com](mailto:lr@stevenslee.com)  
[mag@stevenslee.com](mailto:mag@stevenslee.com)  
*Counsel for Walmart*

Joseph L. Vullo, Esq.  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for CAAP*

Karen O. Moury, Esq.  
Kristine E. Marsilio, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
[kmarsilio@eckertseamans.com](mailto:kmarsilio@eckertseamans.com)  
*Counsel for NRG Energy*

Becky Merola  
Calpine Energy Solutions, LLC  
5325 Sheffield Avenue  
Powell, Ohio 43065  
[becky.merola@calpinesolutions.com](mailto:becky.merola@calpinesolutions.com)

Joline R. Price, Esq.  
Robert W. Ballenger Esq.  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
*Counsel for TURN et al.*

Derrick Price Williamson, Esq.  
Barry A. Naum, Esq.  
Spilman Thomas & Battle PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)  
*Counsel for ArcelorMittal*

Elizabeth R. Marx, Esq.  
John W. Sweet, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
*Counsel for CAUSE-PA*

Mark Belland, Esq.  
O'Brien, Belland & Bushinsky, LLC  
500-506 North 6<sup>th</sup> Street  
Philadelphia, PA 19123  
[mbelland@obbblaw.com](mailto:mbelland@obbblaw.com)  
*Counsel for LIUNA*

Reizdan B. Moore, Esq.  
Reizdan B. Moore, LLC  
3544 North Progress Avenue, Suite 108  
Harrisburg, PA 17110  
[reizdan.moorelaw@comcast.net](mailto:reizdan.moorelaw@comcast.net)  
*Counsel for ChargePoint, Inc.*

May Va Lor  
LIUNA  
905 16<sup>th</sup> Street NW  
Washington, DC 20016  
[mlor@liuna.org](mailto:mlor@liuna.org)

Charles E. Thomas, III, Esq.  
Thomas, Niesen, & Thomas, LLC  
212 Locust Street, Suite 302  
Harrisburg, PA 17101  
[cet3@tntlawfirm.com](mailto:cet3@tntlawfirm.com)  
*Counsel for Calphine Solutions*

Scott F. Dunbar, Esq.  
Keyes & Fox LLP  
1580 Lincoln Street, Suite 880  
Denver, CO 80203  
[sdunbar@keyesfox.com](mailto:sdunbar@keyesfox.com)  
*Counsel for ChargePoint, Inc.*

Mark C. Hammond, Esq.  
Land Air Water Legal Solutions LLC  
850 Cassatt Road  
100 Berwyn Park, Suite 210  
Berwyn, PA 19312  
[mhammond@landairwater.com](mailto:mhammond@landairwater.com)  
*Counsel for Tesla*

Anthony E. Gay, Jr., Esq.  
Jack R. Garfinkle, Esq.  
Jennedy S. Johnson, Esq.  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103  
[anthony.gay@exeloncorp.com](mailto:anthony.gay@exeloncorp.com)  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)  
[jennedy.johnson@exeloncorp.com](mailto:jennedy.johnson@exeloncorp.com)

Kenneth M. Kulak, Esq.  
Anthony C. DeCusatis, Esq.  
Catherine G. Vasudevan, Esq.  
Brooke E. McGlinn, Esq.  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[anthony.decusatis@morganlewis.com](mailto:anthony.decusatis@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)  
*Counsel for PECO Energy Company*



Erika L. McLain  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 320526