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PECO
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February 25, 2021

VIA E-Filing

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:

On February 22, 2021, PECO Energy ("PECO") requested an extension of the 2018-2019 data reporting requirement specified in the Secretarial Letter dated December 8, 2020, in the *Biennial Inspection, Maintenance, Repair and Replacement Plan (2022-2023)* docket (Docket No. M-2009-2094773) until March 9, 2021. On February 24, 2021 PECO received notification that the request was granted.

Please find enclosed Attachment A, which contains the number of above-ground pad-mount transformer failures in calendar years 2018 and 2019 as well as the number of substation inspections in calendar years 2018 and 2019 that were performed during the allowed grace period. PECO will report the 2020 and 2021 transformer data in its 2021 and 2020 Annual Reliability Reports filed pursuant to 52 Pa. Code § 57.195.

As per the stay-at-home orders issued by the Governor and Philadelphia's Mayor, all PECO attorneys and key support staff are working remotely until these restrictions are lifted. Accordingly, PECO will not have its usual access to photocopying and U.S. mail, among other services. PECO requests that all communications with PECO be transmitted by email.

Thank you for your assistance in this matter and please direct any questions regarding the above to Rich Schlesinger at (215) 841-5771 or via email: rich.schlesinger@peco-energy.com.

Sincerely,



cc: Paul Diskin, Bureau of Technical Utility Services (e-mail only)
Dan Searfoorce, Bureau of Technical Utility Services (e-mail only)
John Van Zant, Bureau of Technical Utility Services (e-mail only)

PECO Energy – Attachment A

Padmount Transformer Failures:

Year	Number of Padmount Transformer Failures
2018	133
2019	141

- At the end of 2019 there were 53,671 padmount transformers on system.

Substation Inspections Completed In Grace Period (between 100% and 125% due):

	2018	2019
In Grace Period	556	532
Total	1422	1422