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PECO
2301 Market Street
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February 26, 2021

Via E-Filing

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

RE: PECO Energy Company's Electric Asset Optimization Plan Docket No. P-2015-2471423 and PECO Energy Company's Second Long-Term Infrastructure Improvement Plan for its Electric Operations Docket No. P-2020-3020974

Dear Ms. Chiavetta:

Enclosed for filing in the above referenced matters is PECO Energy Company's Electric Annual Asset Optimization Plan.

Due to the ongoing COVID-19 pandemic, PECO's office personnel are working remotely. 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.

If you have any questions regarding this filing, please do not hesitate to contact me at 215-841-5777.

Sincerely,



cc: Parties of Record

PECO ENERGY COMPANY

ANNUAL ASSET OPTIMIZATION PLAN FOR 2020 - ELECTRIC OPERATIONS

Docket Nos. P-2015-2471423 and P-2020-3020974

PECO ENERGY COMPANY
ANNUAL ASSET OPTIMIZATION PLAN FOR 2020 - ELECTRIC
Docket Nos. P-2015-2471423 and P-2020-3020974

I. INTRODUCTION

On February 14, 2012, Governor Corbett signed into law Act 11 of 2012 ("Act 11"), which amended the Pennsylvania Public Utility Code in several respects, including the addition of Subchapter B (66 Pa. C.S. §§ 1350-1360). Act 11 authorized the Pennsylvania Public Utility Commission ("PUC" or "Commission") to approve a distribution system improvement charge ("DSIC") upon petition by an electric distribution company, a natural gas distribution company, a water utility, or a wastewater utility. A DSIC authorizes a utility to recover the reasonable and prudent costs incurred to repair, improve, or replace eligible property that is part of the utility's distribution system. The DSIC allows utilities to recover the costs of DSIC-eligible property that is placed in service between base rate cases and, therefore, is not included in the existing revenue requirement being recovered in the utility's base rates.

In addition, Subchapter B sets forth various requirements that must be satisfied by a qualifying utility in order to establish a DSIC and to recover the reasonable and prudent costs to repair, improve or replace eligible property.

On August 2, 2012, the Commission entered its *Final Implementation Order in Implementation of Act 11 of 2012* at Docket No. M-2012-2293611 ("Implementation Order"). The Implementation Order sets forth the Commission's expectations with regard to: 1) a Long Term Infrastructure Improvement Plan ("LTIIIP"), which must be filed as a precursor to a request to establish a DSIC (66 Pa.C.S. § 1352); and 2) Annual Asset Optimization Plans ("AAO

Plans"), which must be filed each year by a utility that has an approved DSIC and LTIIIP (66 Pa.C.S. § 1356).

According to the Implementation Order, AAO Plans are intended to provide an overall status report regarding a utility's progress in making infrastructure improvements pursuant to a Commission-approved LTIIIP (Implementation Order at 30). AAO Plans are expected to: 1) demonstrate LTIIIP compliance and progress; and 2) identify a utility's near-term construction projects that will be funded by the DSIC, consistent with the LTIIIP.

On May 22, 2014, 52 Pa. Code § 121.6 was adopted, which requires AAO Plan elements to include: (1) a description of all eligible property repaired, improved and replaced in the immediately preceding 12-month period pursuant to the utility's LTIIIP; and (2) a detailed description of all the facilities to be improved in the upcoming 12 months.

II. PECO's Electric LTIIIP

A. LTIIIP I (2016-2020)

On March 27, 2015, PECO filed for *Approval of its Electric Long Term Infrastructure Improvement Plan and to Establish a Distribution System Improvement Charge for its Electric Operations* at Docket No. P-2015-2471423. PECO's LTIIIP was a five-year plan spanning the years 2016-2020. It was designed to accelerate infrastructure improvements in order to enhance system resiliency and reliability. The plan consisted of three main project areas and a fourth category related to unreimbursed facility relocations: 1) Storm Hardening and Resiliency Measures; 2) Underground Cable Replacements; 3) Building Substation Retirements; and 4) Facility Relocations. During the 5-year LTIIIP period, PECO's increased expenditures were anticipated to amount to \$324.3 million, with \$274.3 million for the above reliability projects and \$50 million for facility relocation work as permitted by 66 Pa. C.S. §1351 (definition of

“eligible property”). On October 22, 2015, the PUC approved PECO’s electric LTIIIP and DSIC petition.¹ PECO’s LTIIIP I plan ended on December 31, 2020.

B. LTIIIP II (2021-2025)

On July 22, 2020, PECO filed for *Approval of its [Second] Electric Long Term Infrastructure Improvement Plan* at Docket No. P-2020-3020974. PECO’s LTIIIP II is a five-year plan spanning the years 2021-2025. It is designed to accelerate infrastructure improvements in order to enhance system resiliency and reliability. The plan consists of three main project areas and a fourth category related to unreimbursed facility relocations: 1) Storm Hardening and Resiliency; 2) Underground Cable Replacements; 3) Substation Switchgear Replacement; and 4) Facility Relocations. During the five-year LTIIIP II period, PECO’s increased expenditures are estimated to be \$1.44 billion, with \$1.36 billion for the above reliability projects and \$75 million for facility relocation work. On November 19, 2020, the PUC approved PECO’s electric LTIIIP II Plan.

PECO hereby provides its AAO Plan for 2020, which addresses both LTIIIP I and LTIIIP II, and is filing copies of this AAO Plan with the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and other interested parties in Docket Nos. P-2015-2471423 and P-2020-3020974.

¹ The DSIC was approved subject to two issues referred to the Office of Administrative Law Judge for hearing: 1) whether the DSIC should apply to transmission voltage rates; and 2) what revenues associated with PECO’s tariff riders should be recovered through the DSIC. (See the Commission’s Opinion and Order, issued October 22, 2015, in Docket No. P-2015-2471423). On September 21, 2017, the Commission approved the Joint Petition for Settlement, which resolved the issues described above.

III. REQUIRED ELEMENTS OF THE AAO PLAN

A. Description of all Eligible Property Repaired, Improved, and Replaced in the Immediately Preceding 12-Month Period Pursuant to PECO's LTIIIP I

Exhibit A² attached hereto provides summary data with respect to projects that were completed in LTIIIP year 2020 for: 1) Customers Experiencing Multiple Interruptions (“CEMI”) improvements, 2) Circuit Rebuilds Enabling Unit Substation Retirements, 3) Main Stem cable replacements, 4) Underground Residential Development (“URD”) cable replacements, 5) Building Substation Retirements, and 6) Facility Relocations (as specified below). From an overall financial perspective in 2020, PECO spent approximately \$89.2 million on the LTIIIP program areas described below compared to \$72.0 million estimated in the LTIIIP for 2020 (excluding Facility Relocations), which included execution of all 2020 projects as well as substantial efforts to begin engineering and construction on the 2021 electric LTIIIP II plan, primarily for Main Stem Cable Replacement and Unit Substation Retirements. PECO met or exceeded its 2020 scope commitments for all planned LTIIIP work categories (i.e., CEMI, Circuit Rebuilds Enabling Unit Substation Retirements, Main Stem cable replacements, and URD cable replacements). Exhibit B, attached hereto, summarizes the estimated and actual spend for every year of LTIIIP I.

1. Customers Experiencing Multiple Interruptions (“CEMI”)

As shown in Exhibit A, PECO met its 2020 LTIIIP goals for CEMI improvements. The LTIIIP estimated that PECO would complete between eight and thirteen CEMI projects and actual results were nine. The CEMI projects were completed in the following locations:

² Exhibit A also details estimated LTIIIP II spend in 2021.

County	Number
Delaware	2
Chester	5
Montgomery	1
Bucks	1

The projects reduced the impact of storm conditions in these counties and involved: 1) replacing open wire and self-supporting cable installations with three-phase and single-phase spacer cable installations; 2) conversion and retirement of obsolete equipment; and 3) extending 34kV and 13kV facilities to create sectionalizing loops. Additionally, PECO began preliminary CEMI work planned for 2021 (i.e., detailed project design, vegetation management and preliminary construction) in Chester, Delaware, York, and Bucks Counties. In 2020, PECO spent \$12.9 million on these CEMI projects compared to the \$15.0 million estimated in the LTIIIP.

2. Circuit Rebuild Enabling Unit Substation Retirements

As shown in Exhibit A, PECO met its LTIIIP goal for Circuit Rebuild Enabling Unit Substation Retirements. The LTIIIP estimated that PECO would rebuild six Unit Substation circuits and actual results were six. PECO retired three 4kV Unit Substations in Philadelphia, one 4kV Unit Substation in Chester County, and two 4kV Unit Substations that spanned both Delaware and Chester Counties. The associated circuits were rebuilt and upgraded to 13kV or 34 kV facilities. Additionally, PECO began substantial preliminary Circuit Rebuild work for 2021 (i.e., detailed project design, vegetation management, civil construction, and electrical construction) in Delaware, Chester, Bucks, Montgomery, and Philadelphia Counties. In 2020, PECO spent \$27.8 million for this Circuit Rebuild work compared to the \$15.0 million estimated in the LTIIIP, with the increase due primarily to preparations for the expansion of Unit Substation Retirements under the approved PECO LTIIIP II plan.

3. Main Stem Cable Replacements

As shown in Exhibit A, PECO met its LTIIIP goal for Main Stem cable replacements for LTIIIP year 2020. The LTIIIP estimated that PECO would replace 12 miles of Main Stem cable and actual results were 12.6 miles. PECO completed three projects totaling 8.4 miles of replaced cable in Philadelphia County, one project totaling 1.0 mile in Delaware County, and two projects totaling 3.2 miles in Montgomery County. As the Company is continuing to ramp up this program in its LTIIIP II, PECO began Main Stem work originally planned for 2021 (i.e., detailed project design, material procurements, and preliminary construction) on large projects in Philadelphia, Delaware, Bucks, Chester, and Montgomery Counties. For 2020, PECO spent \$30.7 million on its Main Stem cable replacements compared to the \$13 million estimated in the LTIIIP, with the increase primarily due to preparations for the expansion of Main Stem Replacements under the approved PECO LTIIIP II plan.

4. Underground Residential Development Cable Replacements

As shown in Exhibit A, PECO met its 2020 LTIIIP goal for URD cable replacements. The LTIIIP estimated that PECO would replace 32.0 miles of URD cable and actual results were 36.5 miles. Close to half of the URD cable replacements addressed reliability issues in Bucks County (16.0 miles), with the remaining projects located in Chester County (2.8 miles), Philadelphia County (7.5 miles), and Delaware County (10.2 miles). PECO also began URD work planned for 2021 (i.e., detailed project design and preliminary construction) in Chester, Delaware, Bucks, Montgomery, and Philadelphia Counties. In 2020, PECO spent \$16.5 million on URD cable replacements compared to the \$17 million estimated in the LTIIIP.

5. Building Substation Retirement

As part of the electric LTIIP, PECO has committed to accelerating the retirement of obsolete building substations and all associated equipment operating at 4kV. In 2020, conceptual design was finalized and detailed design began on the retirement of the Upper Darby 4kV Substation in Delaware County. This multi-year project will run through 2023 and convert all 4kV infrastructure served out of Upper Darby Substation to 13kV supported by a combination of new and existing circuits. Overall reliability will be improved by creating new 13kV circuit breakdowns, installing new reclosers, and retiring obsolete equipment. In 2020, PECO spent \$1.4 million on Building Substation Retirements compared to the \$12 million estimated in the LTIIP; the \$10.6 million favorability was used to fund work (in 2020) associated with the anticipated expansion (in 2021) of the Unit Substation Retirement and Main Stem Cable Replacement areas.

6. Facility Relocation

Facility Relocations involve unreimbursed costs related to highway relocation projects that are eligible for recovery under Sections 1351 and 1353. These costs arise when PECO moves its facilities at the direction of the state, a municipality, or another governmental entity to construct a new road or to perform other construction. Because these projects are reactive in nature, PECO's 2020 LTIIP did not include a projected number of relocations.

PECO continued relocating its facilities in support of PennDOT's project to improve Markley Street's bridges and pedestrian accessibility (at a cost of \$4.5 million) in Norristown, PA. PECO also continued to assist in the relocation of its facilities in support of Amtrak's project to improve approximately 18 miles of transmission lines between its Zoo substation and the Paoli substation (at a cost of approximately \$900,000). \$6.0 million was spent on smaller type

PennDOT and Municipal projects. In 2020, PECO spent \$11.4 million on Facility Relocations as opposed to \$14.9 million estimated in the 2020 AAO Plan.

B. Description of the Facilities to be Improved in the Upcoming 12-Month Period (2021)

PECO expects to meet or exceed its LTIP II goals/targets for 2021 (as specified below and in Exhibit A). From an overall financial perspective, PECO estimates that it will spend approximately \$198.7 million on the following LTIP II projects in 2021.

1. Storm Hardening and Resiliency Programs

a. Customers Experiencing Multiple Interruptions

i. Customer Experiencing Multiple Interruptions Areas

PECO expects that it will meet or exceed its goal to complete between 8 and 13 CEMI Areas projects in 2021, at an estimated cost of \$13.5 million. The majority of the 2021 CEMI Areas projects will be in Chester and Delaware Counties, with the remainder in Bucks and York Counties. These projects will focus on 4kV to 34kV conversions, spacer cable and main cable installations, and sectionalizing existing circuits.

ii. Customers Experiencing Multiple Interruptions Targeted Circuits

PECO expects that it will meet or exceed its goal to complete between 3 and 4 CEMI Targeted Circuits projects in 2021, at an estimated cost of \$6.5 million. The 2021 CEMI Targeted Circuits projects will be in Chester, Delaware, and Montgomery Counties. These projects will focus on spacer cable, main cable installations, and sectionalizing existing circuits.

b. Aerial Infrastructure Resiliency Programs

i. Aerial Infrastructure Resiliency (AIR) Areas

PECO expects that it will meet or exceed its goal to complete between 2 and 5 AIR Areas projects in 2021, at an estimated cost of \$4.9 million. The 2021 AIR Areas projects will be in

Montgomery and Philadelphia Counties. These projects will focus on the replacement of aerial infrastructure, including poles, overhead conductors, cross-arms, insulators, connectors, and cutouts in areas served by one or more circuits.

ii. Aerial Infrastructure Resiliency (AIR) Targeted Assets

PECO expects that it will meet or exceed its goal to complete between 2,500 and 3,500 AIR Targeted Assets replacements in 2021, at an estimated cost \$30.3 million. The 2021 AIR Targeted Assets are focused across the entire PECO service territory. The asset replacements focus on aerial infrastructure, including poles, overhead conductors, cross-arms, insulators, connectors, and cutouts.

iii. Building Substation Retirement

PECO will continue to develop engineering plans for, and begin construction on, the multi-year Upper Darby Building Substation and Overbrook Building Substation projects in 2021, at an estimated cost of approximately \$21 million. This work will include finalizing conceptual and detailed engineering designs, environmental review and testing, long-lead material procurements, vegetation management, and underground civil construction.

iv. Circuit Rebuild Enabling Unit Substation Retirements

PECO expects that it will meet its goals to retire between 6 and 8 Unit Substations and rebuild the associated circuits (i.e., obsolete 4 kV circuits) in 2021, at an estimated cost of \$25 million. These projects will be in Chester, Montgomery, and Philadelphia Counties.

2. Underground Cable Replacement

a. Main Stem Cable Replacements

PECO expects that it will meet or exceed its goal to replace between 28 and 33 miles of Main Stem cable in 2021, at an estimated cost of \$30.5 million. PECO will rebuild Main Stem

primary and secondary infrastructure in Montgomery, Delaware, Chester, and Philadelphia Counties.

b. Underground Residential Development Cable Replacements

PECO expects that it will meet or exceed its goal to replace between 95 and 110 miles of URD cable in 2021, at an estimated cost of \$51.5 million. PECO will upgrade URD systems in Bucks, Montgomery, Philadelphia, Chester, and Delaware Counties.

3. Switchgear Replacement Program

PECO estimates that it will spend \$0.5 million for Substation Switchgear Replacement Program to begin engineering for future replacements within the LTIIIP II plan.

4. Facility Relocation

For 2021, PECO estimates that it will spend \$17.5 million on Facility Relocations based on currently scheduled projects. PECO notes that while it estimated spending \$15 million on Facility Relocations in 2021 in its LTIIIP II plan, that estimation is now higher based on currently scheduled projects.

EXHIBIT A

LTIP I

<i>Million \$</i>	<i>2020 Plan</i>	<i>2020 Actual</i>
Customers Experiencing Multiple Interruptions (CEMI)	\$15.0	\$12.9
Circuit Rebuild for Unit Substation Retirements	\$15.0	\$27.8
Main Stem Cable	\$13.0	\$30.7
URD Cable	\$17.0	\$16.5
Building Substation Retirement	\$12.0	\$1.4
Facility Relocation*	\$14.9	\$11.4
Total	\$86.9	\$100.7

* The LTIP plan as approved included an estimate of \$10.0M for Facility Relocation; however, the numbers reported in PECO's 2019 AAOP reflected the 2020 Facility Relocation budget

	<i>2020 Plan</i>	<i>2020 Actual</i>
Customers Experiencing Multiple Interruptions (CEMI) (Projects)	8 - 13	9
Circuit Rebuild For Unit Substation Retirements (Projects)	6	6
Main Stem Cable (Miles)	12.0	12.6
URD Cable (Miles)	32.0	36.5
Building Substation Retirement	0	0

LTIP II

<i>Million \$</i>	<i>2021 Plan</i>
Customers Experiencing Multiple Interruptions (CEMI) Areas	\$13.5
Customers Experiencing Multiple Interruptions (CEMI) Targeted Circuits	\$6.5
Aerial Infrastructure Resiliency Areas	\$4.9
Aerial Infrastructure Resiliency Targeted Assets	\$30.3
Building Substation Retirement	\$21.0
Circuit Rebuild for Unit Substation Retirements	\$25.0
Main Stem Cable	\$30.5
URD Cable	\$51.5
Switchgear Replacement Program	\$0.5
Facility Relocation*	\$15.0
Total	\$198.7

* LTIP plan includes \$15.0M; however, PECO estimates that it will spend \$17.5 million on Facility Relocations based on currently scheduled projects

<i>Units</i>	<i>2021 Plan</i>
Customers Experiencing Multiple Interruptions (CEMI) Areas (Projects)	8-13
Customers Experiencing Multiple Interruptions (CEMI) Targeted Circuits (Projects)	3-4
Aerial Infrastructure Resiliency Areas (Projects)	2-5
Aerial Infrastructure Resiliency Targeted Assets (Assets)	2,500-3,500
Building Substation Retirement	0
Circuit Rebuild for Unit Substation Retirements (Units)	6-8
Main Stem Cable (Miles)	28-33
URD Cable (Miles)	95-110
Switchgear Replacement Program	0
Facility Relocation	0

EXHIBIT B – LTIP I (2016-2020)

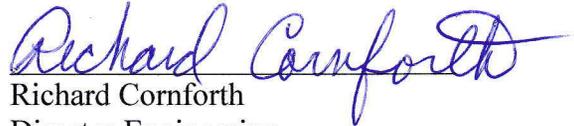
<i>Million \$</i>	<i>2016 Plan</i>	<i>2016 Actual</i>	<i>2017 Plan</i>	<i>2017 Actual</i>	<i>2018 Plan</i>	<i>2018 Actual</i>	<i>2019 Plan</i>	<i>2019 Actual</i>	<i>2020 Plan</i>	<i>2020 Actual</i>	<i>2016-2020 Plan</i>	<i>2016-2020 Actual</i>
Customers Experiencing Multiple Interruptions (CEMI)	\$7.7	\$7.8	\$10.0	\$9.9	\$15.0	\$14.3	\$15.0	\$14.1	\$15.0	\$12.9	\$62.7	\$59.0
Circuit Rebuild for Unit Substation Retirements	\$1.7	\$1.8	\$14.5	\$14.3	\$15.0	\$14.7	\$15.0	\$19.5	\$15.0	\$27.8	\$61.2	\$78.1
Main Stem Cable	\$8.2	\$8.4	\$18.0	\$18.8	\$18.0	\$16.4	\$15.0	\$17.9	\$13.0	\$30.7	\$72.2	\$92.2
URD Cable	\$4.2	\$4.5	\$10.0	\$9.3	\$17.0	\$15.4	\$17.0	\$17.1	\$17.0	\$16.5	\$65.2	\$62.8
Building Substation Retirement	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$1.0	\$0.4	\$12.0	\$1.4	\$13.0	\$1.8
Sub Total	\$21.8	\$22.5	\$52.5	\$52.3	\$65.0	\$60.8	\$63.0	\$69.0	\$72.0	\$89.3	\$274.3	\$293.9
Facility Relocation*	\$10.0	\$10.9	\$12.2	\$20.5	\$13.5	\$15.3	\$10.0	\$10.4	\$14.9	\$11.4	\$60.6	\$68.5
Total	\$31.8	\$33.4	\$64.4	\$72.8	\$78.5	\$76.1	\$73.0	\$79.4	\$86.9	\$100.7	\$334.9	\$362.4
<i>Units</i>	<i>2016 Plan</i>	<i>2016 Actual</i>	<i>2017 Plan</i>	<i>2017 Actual</i>	<i>2018 Plan</i>	<i>2018 Actual</i>	<i>2019 Plan</i>	<i>2019 Actual</i>	<i>2020 Plan</i>	<i>2020 Actual</i>	<i>2016-2020 Plan</i>	<i>2016-2020 Actual</i>
Customers Experiencing Multiple Interruptions (CEMI) - Projects	5 – 8	10	6 – 9	10	8 – 13	11	8 – 13	14	8 – 13	9	35 – 56	54
Circuit Rebuild for Unit Substation Retirements - Units	0	0	5	5	6	6	6	6	6	6	23	23
Main Stem Cable - Miles	8	10.8	17	18.1	17	19	14	14.1	12	12.6	68	74.6
URD Cable - Miles	8	9.6	19	22	32	32.9	32	32.6	32	36.5	123	133.6
Building Substation Retirement	0	0	0	0	0	0	0	0	0	0	0	0

* The LTIP plan as approved included an estimate of \$50.0M for Facility Relocation for 2016-2020; however, the numbers reported in PECO’s annual AAOPs for the same time periods (and shown in the table above) reflect the Facility Relocation budgets for those years

VERIFICATION

I, Richard Cornforth, hereby declare that I am Director Engineering for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts sets forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. § 4904 pertaining to false statements to authorities.

Date: February 26, 2021


Richard Cornforth
Director Engineering

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF :
ITS ELECTRIC LONG TERM : Docket Nos. P-2015-2471423 and
INFRASTRUCTURE : P-2020-3020974
IMPROVEMENT PLAN :

CERTIFICATE OF SERVICE

I certify and affirm that I have this day served a copy of the *2020 Annual Asset Optimization Plan relating to PECO Energy Company's Electric Long Term Infrastructure Improvement Plan*, in the above-referenced docket, on the following persons in the matter specified with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

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Dated: February 26, 2021

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