

Jennedy S. Johnson
Assistant General Counsel

Telephone 215.841.4353
Fax 215.568-3389
Jennedy.Johnson@exelconcorp.com

PEO Energy
2301 Market Street / S23-1
Philadelphia, PA 19103

March 15, 2021

Via E-Filing

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

RE: Letter of Notification of PECO Energy Company, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Construct a New Transmission Monopole in the Borough of Norristown, Montgomery County, Pennsylvania that Will Replace an Existing Monopole that will Conflict with the PennDOT Barbados Street Connector Road
Docket No. A-2020-

Dear Ms. Chiavetta:

Enclosed for filing on behalf of PECO Energy Company is a Letter of Notification (“LON”) requesting approval to Construct a New Transmission Monopole in the Borough of Norristown, Montgomery County, Pennsylvania that Will Replace an Existing Monopole that will Conflict with the PennDOT Barbados Street Connector Road. This LON is filed pursuant to the Pennsylvania Public Utility Commission’s regulations at 52 Pa. Code § 57.72(d)(1). Please note that due to necessary transmission outages, PECO is seeking expedited consideration of this filing.

Copies of this LON and a Notice of Filing have been served upon the parties as required by 52 Pa. Code § 57.74 and indicated on the enclosed Certificate of Service. Confidential Attachment 3 to the LON has been emailed directly to Secretary Chiavetta.

If there are any questions concerning this matter, please contact me at the address or telephone number provided above.

Respectfully submitted,



Jennedy S. Johnson
Enclosures

cc: Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LETTER OF NOTIFICATION OF :
PECO ENERGY COMPANY, FILED :
PURSUANT TO 52 PA. CODE :
CHAPTER 57 SUBCHAPTER G, FOR :
APPROVAL TO CONSTRUCT A :
NEW TRANSMISSION MONOPOLE : DOCKET NO.: A-2020-
IN THE BOROUGH OF :
NORRISTOWN, MONTGOMERY :
COUNTY, PENNSYLVANIA THAT :
WILL REPLACE AN EXISTING :
MONOPOLE THAT WILL CONFLICT :
WITH THE PENNDOT BARBADOS :
STREET CONNECTOR ROAD :**

CERTIFICATE OF SERVICE

I hereby certify that on this date, a true and correct copy of the foregoing *Letter of Notification of PECO Energy Company* has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

VIA ELECTRONIC MAIL:

Derrick Perry, Councilman, President Borough Municipal Council Municipality of Norristown 235 E. Airy Street Norristown, PA 19401 dperry@norristown.org	Amrinder Singh, Code Enforcement Manager & Building Code Official & Chief Executive Officer Department of Buildings & Code Enforcement Municipality of Norristown 235 E. Airy Street, 2 nd Floor Norristown, PA 19401 asingh@norristown.org
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<p>Crandall O. Jones, Municipal Administrator Municipality of Norristown 235 E. Airy Street Norristown, PA 19401 cjones@norristown.org</p>	<p>Jayne Musonye, Director Planning & Municipal Development Municipality of Norristown 235 E. Airy Street, 2nd Floor Norristown, PA 19401 jmusonye@norristown.org</p>
<p>Dr. Valerie A. Arkoosh, Chair Montgomery County Board of Commissioners P.O. Box 311 Norristown, PA 19404 val@montcopa.org</p>	<p>Department of Environmental Protection Rachel Carson State Office Building 400 Market Street Harrisburg, PA 17101</p>
<p>Yassmin Gramian, Secretary Department of Transportation Keystone Building 400 North Street, 5th Floor Harrisburg, PA 17120</p>	<p>Nancy Moses, Chairman Historical and Museum Commission State Museum Building 300 North Street Harrisburg, PA 17120</p>

Dated: March 15, 2021



Jennedy S. Johnson (PA No. 203098)
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
Phone: 215.841.4353
Fax: 215.568.3389
jennedy.johnson@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LETTER OF NOTIFICATION OF PECO	:	
ENERGY COMPANY, FILED	:	
PURSUANT TO 52 PA. CODE	:	
CHAPTER 57 SUBCHAPTER G,	:	
FOR APPROVAL TO CONSTRUCT A	:	
NEW TRANSMISSION MONOPOLE IN	:	DOCKET NO. A-2020-
THE BOROUGH OF NORRISTOWN,	:	
MONTGOMERY COUNTY,	:	
PENNSYLVANIA THAT WILL	:	
REPLACE AN EXISTING MONOPOLE	:	
THAT WILL CONFLICT WITH THE	:	
PENNDOT BARBADOS STREET	:	
CONNECTOR ROAD	:	

LETTER OF NOTIFICATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PECO Energy Company (“PECO” or “Company”) hereby files this Letter of Notification, pursuant to 52 Pa. Code § 57.72(d), to request approval of the Pennsylvania Public Utility Commission (“Commission”) to construct a new transmission monopole that will replace an existing monopole that conflicts with the PennDOT Barbados Street connector road, in Norristown, Pennsylvania (the “Project”). Due to the scheduled transmission outage needed to complete construction, PECO is requesting expedited treatment of this filing – by the April 15, 2021 Public Meeting. In further support of the siting authority requested herein, PECO states as follows:

I. INTRODUCTION

1. This Letter of Notification is filed by PECO, a public utility that provides electric distribution, transmission, and default services in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. PECO's address is 2301 Market Street, Philadelphia, Pennsylvania 19103.

3. PECO's attorney in this matter authorized to receive notices and communications on its behalf is:

Jennedy S. Johnson
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103
215.841.4353
jennedy.johnson@exeloncorp.com

PECO agrees to accept electronic service in this proceeding.

4. PECO furnishes electric service to approximately 1.6 million customers throughout its certificated service territory, which includes all or portions of five counties and encompasses approximately 2,100 square miles in southeastern Pennsylvania with a population of approximately four million people. PECO is a "public utility" and an "electric distribution company" as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102 and 2803.

5. PECO owns 1,067 miles of transmission lines operating at 69 kilovolts ("kV") or higher, 472 substations, approximately 9,000 miles of underground distribution cable, and approximately 13,000 miles of aerial distribution lines operating at less than 69 kV.

6. This Letter of Notification includes the following accompanying attachments:

- Attachment 1 Project Map
- Attachment 2 Steel Tubular Monopole Structure

- Attachment 3 Letter of Notification Filing Checklist

7. This Letter of Notification and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa. Code § 57.72(d)(4).

II. THE PROJECT

A. Need for the Project

8. This project involves the construction of one new transmission monopole (“new Structure 11-11”) to replace the existing monopole (“existing Structure 11-11”) that will conflict with the PennDOT Barbados Street connector, which is part of the Markley Street improvement project. Existing Structure 11-11 is located in Norristown near the intersection of Lafayette Street and Barbados Street and is in the way of PennDOT’s Markely Street project. The project is needed as PennDOT has requested that PECO relocate existing Structure 11-11 to permit PennDOT to construct the new road per their desired alignment.

B. Description of the Proposed Project

9. Structure 11-11 (both existing and new) is located on PECO’s 220-64 line, which is 3.57 miles long and comprised of 34 structures. Existing Structure 11-11 is a 230 kV steel tubular monopole with concrete drill-pier foundations. PECO will construct a new structure approximately 25 feet west of the existing structure. PECO will connect the new structure to the existing high voltage transmission line approximately 25 feet west of existing Structure 11-11. PennDOT has approved the new location. Existing Structure 11-11 will be removed once the new structure has been erected and the conductors are transferred over. A map of the proposed Project is provided as Attachment 1.

10. New Structure 11-11 will be of similar size and height as the existing structure. A typical steel tubular monopole with concrete drill-pier foundations is shown in Attachment 2.

11. The total estimated cost of the Project is approximately \$1.1 million. PennDOT will reimburse PECO for the cost of the project. PECO will own and build the proposed project.

12. Upon Commission approval, the Project has a scheduled construction start date of April 19, 2021. Due to the scheduled transmission outage needed to complete construction, PECO is requesting expedited treatment of this filing – by the Commission’s April 15, 2021 Public Meeting.

III. HEALTH AND SAFETY

13. The proposed Project will not create any unreasonable risk of danger to the public health or safety.

14. The design, construction, and operation of the Project will meet or be better than the requirements specified in the latest revision of the National Electrical Safety Code (“NESC”) and all applicable safety standards established by the Occupational Safety and Health Administration (“OSHA”). All work shall be done in accordance with NESC, OSHA, and any applicable local, state, or federal requirements.

15. Consistent with its Engineering Practice EPP-2090, PECO will construct the Project for ground clearances that exceed the requirements of NESC-2017 and the existing conductor will not be replaced. With respect to vertical clearances, PECO designs its facilities to meet the NESC rules, plus a minimum of 3 additional feet of vertical clearance. Similarly, PECO adds a minimum of 2 additional feet of beyond the NESC horizontal clearance rules.

IV. DESCRIPTION OF THE PROJECT AREA

16. The Project area is on PennDOT property adjacent to a parking lot. PECO has an easement for the 220-64 line at this location.

17. PECO does not anticipate vegetation management being required as a result of this LON.

18. The closest airport to the Project area is Kunda airport, which is located approximately 6.5 miles northwest of new Structure 11-11. PECO does not anticipate any interference with airport operations because of the distance from the Project area. PECO will file any required documentation with the Federal Aviation Administration and the Pennsylvania Department of Transportation, Bureau of Aviation.

19. The Project will not traverse or affect any unique geological or scenic areas.

20. The proposed Project will not affect any state lands, national parks, state parks, local parks, recreational areas, or natural landmarks.

21. The Project is not expected to have any impacts on communications towers, pipelines, or other utilities.

22. No 100-year floodplains are located within the Project area.

V. NOTICE

23. Copies of this Letter of Notification will be served on the governmental agencies, municipalities, and other public entities in accordance with 52 Pa. Code § 57.72(d)(3).

VI. LETTER OF NOTIFICATION

24. PECO is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission's regulations at 52 Pa. Code § 57.72(d)(1)(vi).

25. The proposed Project qualifies for use of a Letter of Notification because the new High Voltage transmission structure impacts less than two miles of the circuit.

26. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification the proposed Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71 et seq.

VII. CONCLUSION

WHEREFORE, PECO Energy Company respectfully requests Pennsylvania Public Utility Commission approval to construct a new transmission monopole that will replace an existing monopole that conflicts with the PennDOT Barbados Street Connector Road, in Norristown, Montgomery County, Pennsylvania as explained above and in the Attachments hereto.

Respectfully submitted,

A handwritten signature in blue ink that reads "JS Johnson". The signature is written in a cursive style with a large, stylized "J" and "S" at the beginning.

Anthony E. Gay (Pa. No. 74624)
Jack R. Garfinkle (Pa. No. 81892)
Jennedy S. Johnson (Pa. No. 203098)
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103
215.841.4353 (bus)
215.568.3389 (fax)
anthony.gay@exeloncorp.com
jack.garfinkle@exeloncorp.com
jennedy.johnson@exeloncorp.com

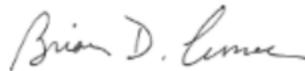
Dated: March 15, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LETTER OF NOTIFICATION OF :
PECO ENERGY COMPANY, FILED :
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WILL REPLACE AN EXISTING :
MONOPOLE THAT WILL CONFLICT :
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STREET CONNECTOR ROAD :**

VERIFICATION

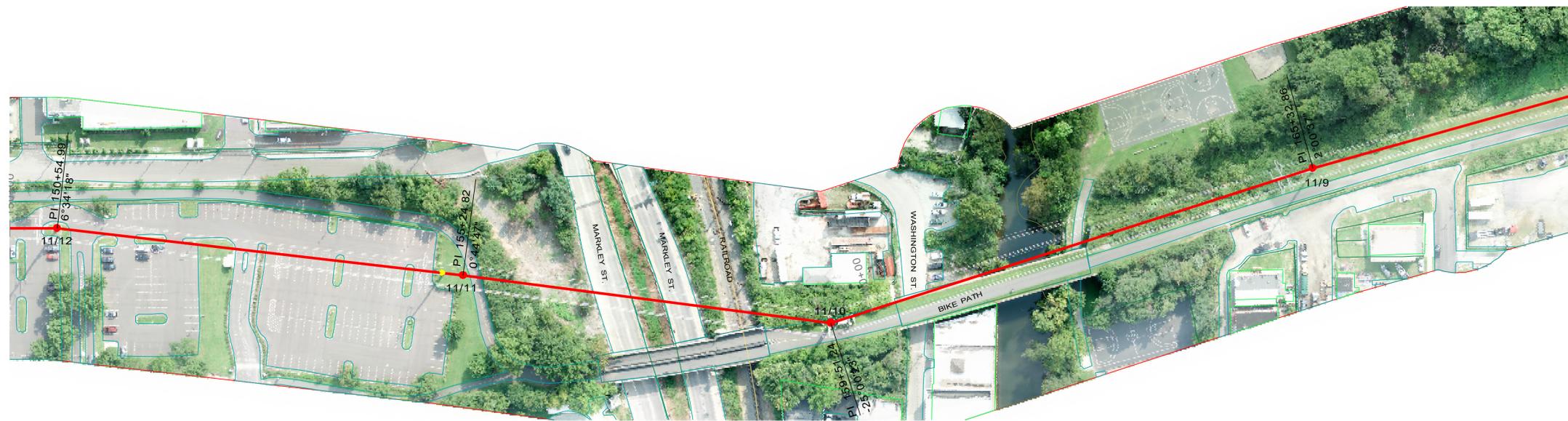
I, Brian D. Crowe, hereby declare that I am Vice President of Transmission and Substation for PECO Energy Company; hereby state that the fact set forth in the above-captioned Letter of Notification are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at hearing if held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Date: March 15, 2021

Brian D. Crowe
Vice President of Transmission
and Substation

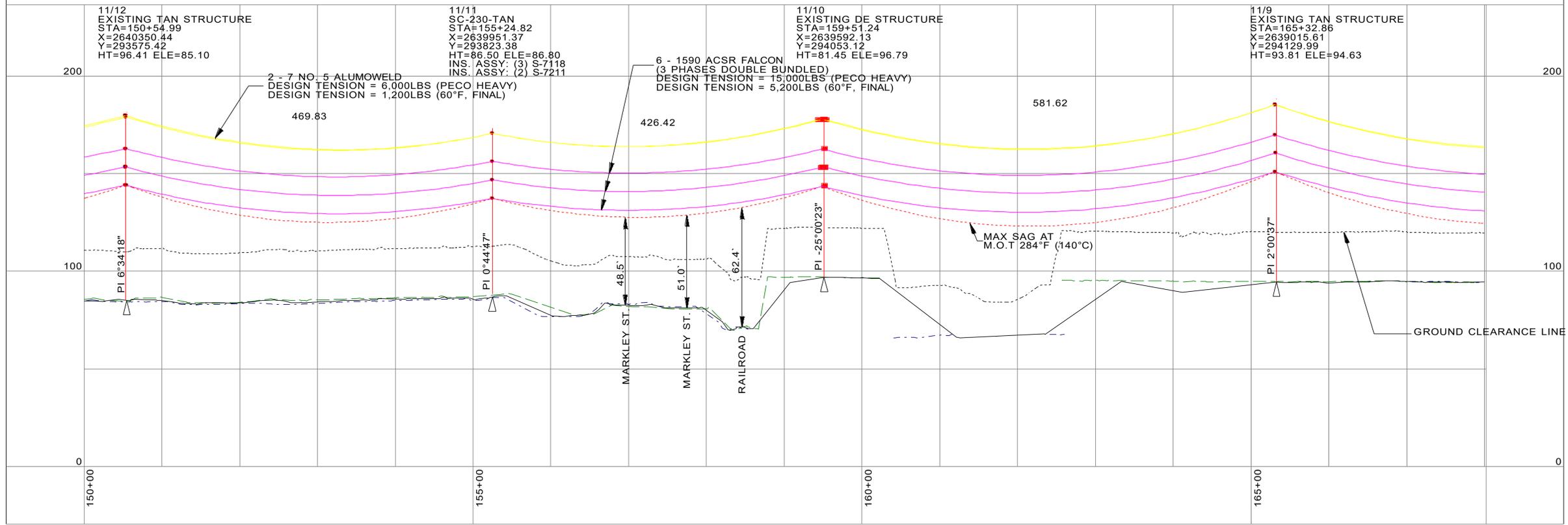
PLS-CADD DRAWING



LEGEND

- PROPOSED POLE LOCATION
- EXISTING STRUCTURE 11/11 LOCATION

50.0 FT_H HORIZ. SCALE
20.0 FT_V VERT. SCALE



11/12
EXISTING TAN STRUCTURE
STA=150+54.99
X=2640350.44
Y=293575.42
HT=96.41 ELE=85.10

11/11
SC-230-TAN
STA=155+24.82
X=2639951.37
Y=293823.38
HT=86.50 ELE=86.80
INS. ASSY: (3) S-7118
INS. ASSY: (2) S-7211

11/10
EXISTING DE STRUCTURE
STA=159+51.24
X=2639592.13
Y=294053.12
HT=81.45 ELE=96.79

11/9
EXISTING TAN STRUCTURE
STA=165+32.86
X=2639015.61
Y=294129.99
HT=93.81 ELE=94.63

2 - 7 NO. 5 ALUMINOWELD
DESIGN TENSION = 6,000LBS (PECO HEAVY)
DESIGN TENSION = 1,200LBS (60°F, FINAL)

6 - 1590 ACSR FALCON
(3 PHASES DOUBLE BUNDLED)
DESIGN TENSION = 15,000LBS (PECO HEAVY)
DESIGN TENSION = 5,200LBS (60°F, FINAL)

PI 6°34'18"

PI 0°44'47"

PI -25°00'23"

PI 2°00'37"

MAX SAG AT
M.O.T 284°F (140°C)

GROUND CLEARANCE LINE (230KV)

THIS DRAWING WAS PREPARED BY POWER ENGINEERS, INC. FOR A SPECIFIC PROJECT. TRAINING INTO CONSIDERATION THE SPECIFIC AND UNIQUE REQUIREMENTS OF THE PROJECT. REUSE OF THIS DRAWING OR ANY INFORMATION CONTAINED IN THIS DRAWING FOR ANY PURPOSE IS PROHIBITED UNLESS WRITTEN PERMISSION FROM BOTH POWER AND POWER'S CLIENT IS GRANTED.

- NOTES:
- SAG SHOWN AT 60°F FINAL UNLESS OTHERWISE NOTED.
 - 25.4FT CLEARANCE LINE DISPLAYED FOR CONDUCTORS (230KV)
 - DESIGN TENSIONS LISTED AT 1" ICE, 8PSF WIND, 0°F, INITIAL (PECO HEAVY) AND AT 0" ICE, 0PSF WIND, 60°F, FINAL
 - ALL 230KV PHASES CONSIST OF 2 WIRES PER PHASE, 3 PHASES TOTAL.

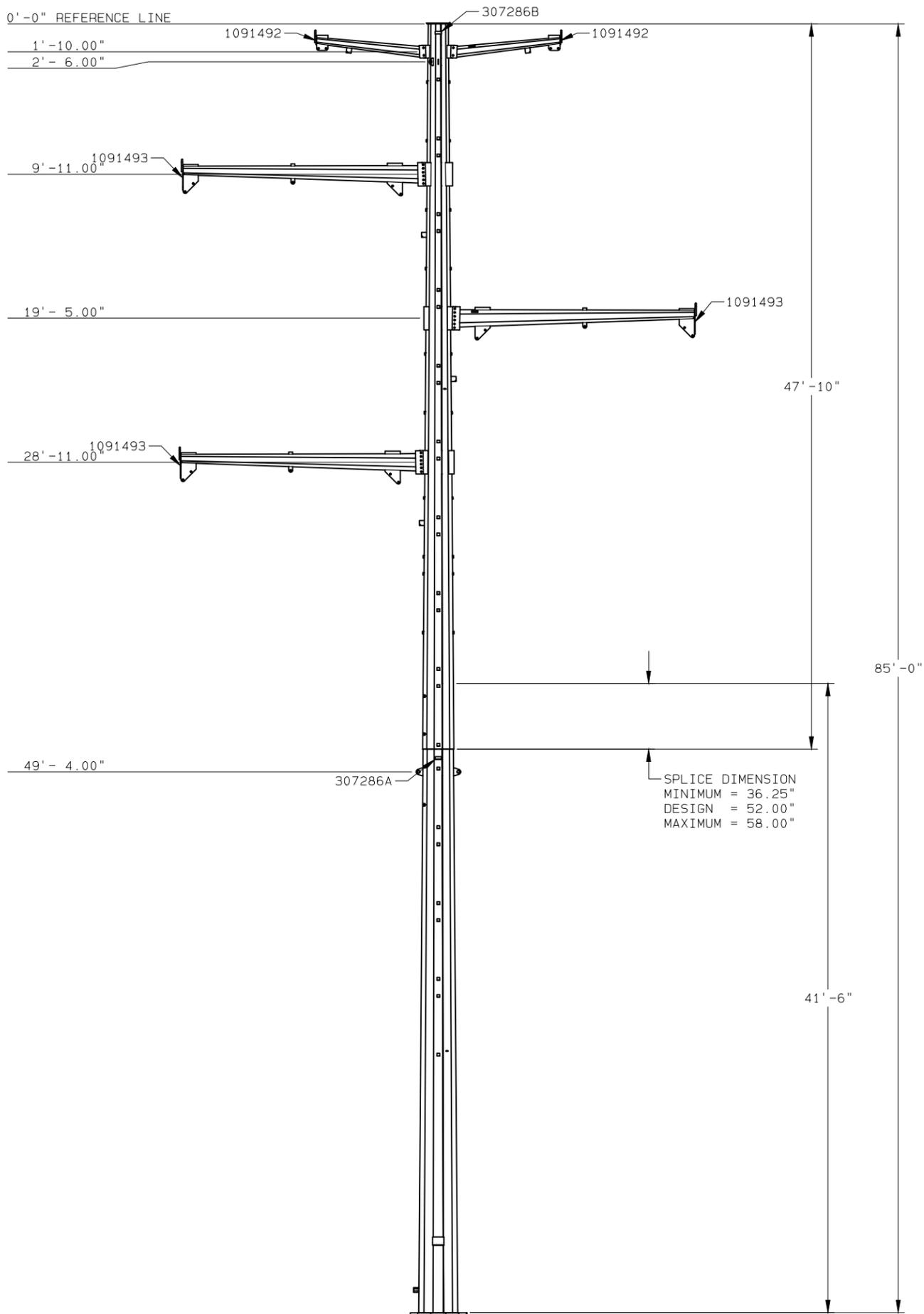
REV	REVISIONS	DATE	DRN	DSGN	CKD	APPD	REV
	ISSUED FOR REVIEW	09/16/20	PEI	BJB	GY	PG	
	REVISIONS	DATE	DRN	DSGN	CKD	APPD	
	REFERENCE DRAWINGS						

DSGN BJB
DRN PEI
CKD GY
SCALE: H: 1" = 50'
V: 1" = 20'
FOR 34X44 DWG ONLY

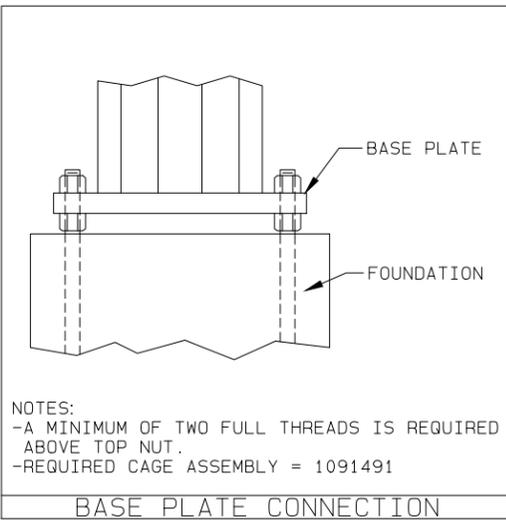


PECO ENERGY COMPANY
220-64 STRUCTURE 11/11 REBUILD
PLAN & PROFILE

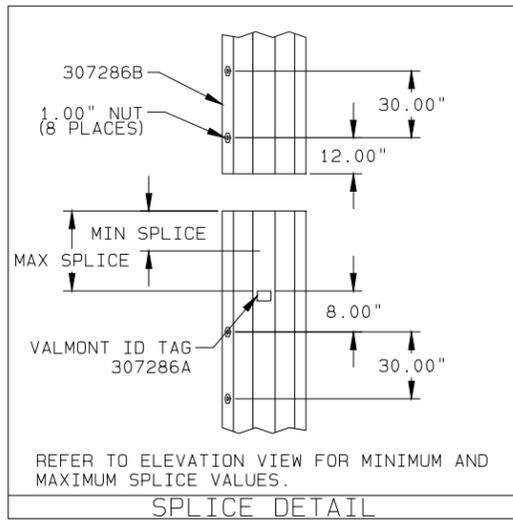
JOB NUMBER 165699
DRAWING NUMBER 1 OF 1



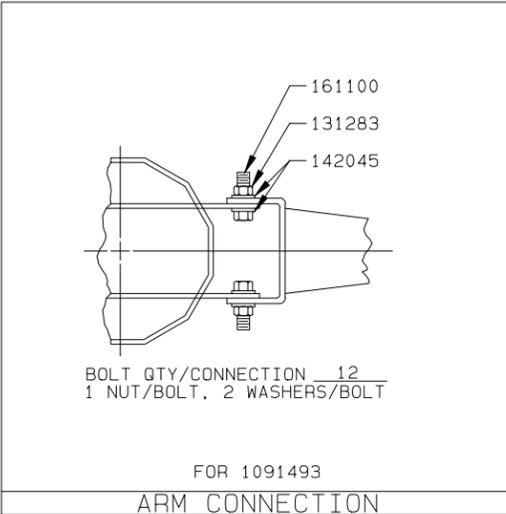
ELEVATION VIEW
SEE FABRICATION DRAWINGS
FOR ADDITIONAL DETAILS



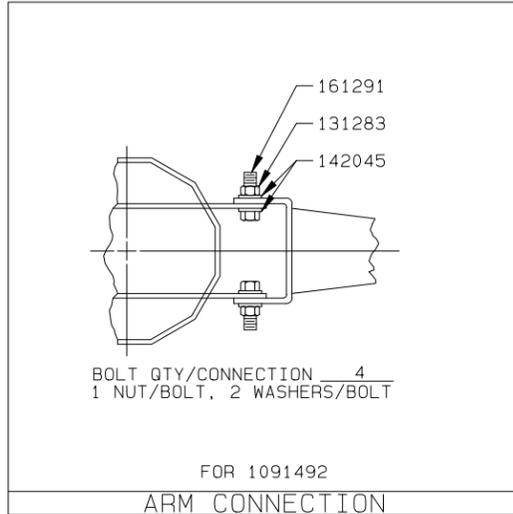
BASE PLATE CONNECTION



SPLICE DETAIL



ARM CONNECTION



ARM CONNECTION

- NOTES:
- POLE SHAFT-GOVERNING REACTIONS:
MOMENT = 20,669 IN-KIPS
SHEAR = 27,832 #
VERTICAL = 34,636 #
 - COMPONENT IDENTIFICATION: VALMONT ID TAG LOCATIONS ARE INDICATED BY CALLOUTS ON DRAWING. THE VALMONT ID TAG CONTAINS INFORMATION FOR INTERNAL TRACKING AND FIELD ASSEMBLY. ONLY THE VALMONT PART NUMBER NEEDS TO MATCH FOR FIELD ASSEMBLY, ALL OTHER IDENTIFICATION IS FOR INTERNAL USE.

A = MANUFACTURING SITE (ONE CHARACTER)
B = VALMONT PART NUMBER (SEVEN CHARACTERS)
C = FABRICATION SEQUENCE NUMBER (ONE OR MORE CHARACTERS)
D = VALMONT ORDER NUMBER (SIX CHARACTERS)
E = VALMONT ORDER RELEASE NUMBER (ONE OR MORE CHARACTERS)

(A) (BBBBBB) (C)
(DDDDDD) (E)
 - ASSEMBLY AND ERECTION GUIDELINES: SEE VALMONT TRANSMISSION INSTALLATION GUIDELINE I002 (WWW.VALMONTUTILITY.COM/I002).
 - SLIP JOINT JACKING FORCE
MINIMUM = 34,636#
MAXIMUM = 90,000#

BILL OF MATERIAL (SHIPPING SEQ.=1 FOR ALL)							
VALMONT PART NUMBER	DESCRIPTION	UNIT WEIGHT (LBS)	QTY PER STR				
307286A	SECTION ASSEMBLY	7,064	1				
307286B	SECTION ASSEMBLY	4,012	1				
1091492	SW_ARM	154	2				
1091493	COND_ARM	765	3				
VALMONT PART NUMBER	DESCRIPTION					QTY PER STR	
	HARDWARE SIZE (IN)			GENERAL	FINISH		ASTM SPEC
	BOLT DIA	NUT LONG	WSHR				
161291	1.00	3.25			HDGV	A325	8
142045			1.00	CS, FLAT	HDGV	F436	88
131283			1.00	DH, LOCK	HDGV	A563	44
161100	1.00	4.00			HDGV	A325	36

PROPRIETARY INFORMATION

THESE DOCUMENTS, DRAWINGS, AND/OR CALCULATIONS AND ALL INFORMATION RELATED TO THEM ARE THE EXCLUSIVE PROPERTY AND THE PROPRIETARY INFORMATION OF VALMONT INDUSTRIES, INC. AND ARE FURNISHED SOLELY UPON THE CONDITIONS THAT THEY WILL BE RETAINED IN STRICTEST CONFIDENCE AND SHALL NOT BE DUPLICATED, USED, OR DISCLOSED IN WHOLE OR IN PART FOR ANY PURPOSE, IN ANY WAY, WITHOUT THE PRIOR WRITTEN PERMISSION OF VALMONT INDUSTRIES, INC.

220-64 LINE STR 11-11

DUPLICATE DRAWING DISTRIBUTION PED49754485.0' AGH. STR 11/11

DWG SIZE D CLASS CODE (1) 1 CLASS NO. (3) 450

DRAWN	ENGR	DATE	SCALE
AG22	AT70	01/15/21	NONE
P.A. CHK	SHOP CHK		
AG22	01/15/21		
OTHER SPECIFICATIONS			
MATERIAL	THICKNESS	WEIGHT	
		13,773#	

REV ID DATE REV BY CHK BY REVISION DESCRIPTION

ORDER NO. 497544 CUSTOMER PECO ENERGY DESCRIPTION 85.0' AGH, STR 11/11 DWG NO. 307286Z

Letter of Notification Filing Checklist
PECO 220-64 LON Application

In an effort to facilitate the Commission's review process for a Letter of Notification (LON) for the Siting and Construction of Electric Transmission Lines, the following checklist may be consulted by the applicant. The applicable regulatory requirements for a LON application are found in 52 Pa. Code §§ 57.71-77. The checklist is provided to streamline the review process by anticipating requests for additional information that may arise from Commission staff. The checklist does not create additional mandates or regulatory requirements for approval of a LON.

1. Provide the name of the applicant and the address of its principal business office.

PECO Energy Company
2301 Market Street
Philadelphia, PA 19103

2. Name, title and business address of the attorney of the applicant and the person authorized to receive notice and communications with respect to the application if other than the attorney or the applicant.

Jennedy S. Johnson
Assistant General Counsel
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
215-841-4353
jennedy.johnson@exeloncorp.com
PA Bar No. 203098

3. General description of the proposed route of the HV line, to include the number of route miles, the right-of-way width and the location of the proposed HV line within each city, borough, town and township traversed. Describe which sections of 52 Pa. Code §57.72(d)(1)(i)-(iv) the applicant believes are applicable.

This project involves the construction of one new transmission monopole to replace the existing monopole ("existing Structure 11-11") that will conflict with the PennDOT Barbados Street connector road, which is part of PennDOT's Markley Street improvement project. Existing Structure 11-11 is located between Lafayette and Washington Streets in Norristown and is on PECO's 220-64 line, which runs from Barbados Substation to Plymouth Meeting Substation and is 3.57 miles long. All 34 structures that are located along the 220-64 line (including existing Structure 11-11) are 230 kV steel tubular monopoles with concrete drill-pier foundations. New Structure 11-11 will be relocated approximately 25 feet west of its existing location.

The proposed project is located entirely within the borough of Norristown, Pennsylvania.

This application is made pursuant to two provisions of 52 Pa. Code §57.72(d)(1):

- 52 Pa. Code §57.72(d)(1)(v): An HV line which is to be reconducted or reconstructed so long as the size, character, design or configuration of the proposed HV line does not substantially alter the right-of-way. *See* PECO answer to Question 12, below, for evidence that this project does not substantially alter the right-of-way.
- 52 Pa. Code §57.72(d)(1)(vi): An HV line having a proposed route of 2 miles or less. *Note:* the route of this project is approximately 25 feet.

4. Provide a general statement of the need for the proposed HV line in meeting identified present and future demands for service, of how the proposed HV line will meet that need and of the engineering justification for the proposed line.

The location of existing Structure 11-11 conflicts with PennDOT's proposed Barbados Street connector road between Lafayette Street and Washington Street in Norristown. PennDOT has requested that PECO relocate existing Structure 11-11 to permit PennDOT to construct the new road per their desired alignment. PECO will construct a new structure approximately 25 feet west of the existing structure at a location that PennDOT has approved. The new structure will be similar in size and height to the existing structure.

See PECO Answer to Question 23, below, for further discussion of alternatives considered.

5. Please provide an engineering assessment of the project including information to address the following:

- a) Provide an analysis of minimum conductor clearances and conductor thermal ratings.**
- b) Provide engineering design criteria and parameters such as vertical clearance to ground.**
- c) Provide an explanation as to how the project will be in compliance with the current NESC and, where applicable, information on how the applicant's design specifications and safety rules may exceed NESC suggested standards for transmission lines.**

- a) Conductor clearances and conductor thermal ratings:

Conductor clearances for the project meet or exceed the requirements of PECO's Engineering Practice EPP-2090 OHT Design Clearances. The clearance requirement in EPP-2090 exceeds the requirements of NESC-2017; examples of PECO clearance requirements are provided in subsection b., below. The existing conductor will not be replaced.

- b) Engineering design criteria and parameters such as vertical clearance to ground.

NESC Section 232 requires the following vertical clearances for 230 kV facilities:

Ground, Farmland	22.4'
Roadways, Driveways, Parking lots	22.4'
Railroads, above top or rail	30.4'
Area not accessible by vehicles	18.4'

For new construction (including proposed new Structure 11-11), PECO designs its facilities to meet the NESC rules plus a minimum of 3 feet of additional vertical clearance. Similarly, PECO adds a minimum of an additional 2 feet beyond the NESC horizontal clearance.

- c) Explanation as to how the project will be in compliance with the current NESC and, where applicable, information on how the applicant's design specifications and safety rules may exceed NESC suggested standards for transmission lines.

The ROW width for the proposed project is governed by the conductor displacement due to wind with the assumption that buildings can be erected on the easement line regardless of local municipality building setback requirements. The ROW width varies along the modified segment, but the ROW provided exceeds the requirements of the NESC and PECO's Engineering Practice EPP-2090 "OHT Design Clearances" and will provide access for line maintenance, repair, and vegetation management.

- 6. If applicable, provide the current height of the structures expected to be replaced, the proposed height of the new structures to be installed and the height of the structures to remain in place. Provide the number of structures proposed vs. current number of structures. Provide the location and footprint of the current structures compared to the proposed structures.**

The new structure will be installed, as described in the table below. Note that existing Structure 11-11 is 87 feet tall. The maximum height of towers in the area will thus remain unchanged.

New Structure Number	Height (ft)	Location compared to existing structure
11-11	85	About 25ft west of existing Structure 11-11. The new structure will be located on the existing transmission line alignment.

See also PECO Attachments 1 and 2, which are, respectively, a PlanProfile of the project and a Steel Tubular Monopole Structure rendering.

Existing Structure 11-11 will be removed once the new structure has been erected and the conductors are transferred over.

- 7. If applicable, state if any properties/easements that did not previously have structures will now have a structure. State if the easement agreement allows for structures on these properties that did not previously have a structure. Explain the Company's process of informing the property owners that a structure will be placed on the easement to their property.**

No new permissions or easements from other entities are required for this project.

- 8. If applicable, what is the PJM project ID No. for the proposed project? Has this project been submitted to the PJM Transmission Expansion Advisory Committee (TEAC)? If so, please provide a description of the project as submitted to the TEAC. If this project is part of a larger project, summarize the larger project of which the LON is a part. Please describe how this project may mitigate potential planning criteria violations.**

This project does not affect transmission flows. The project, therefore, does not involve potential planning criteria and is not subject to PJM review or approval. It has not been submitted to PJM or any PJM committee.

This project is also not part of a larger project.

- 9. Provide a breakdown of project costs. Please explain who will own, finance and build the proposed project.**

PECO estimates the project costs to be \$1.1 million. \$373,000 of that total is attributable to materials (e.g., a new monopole, foundation, and appurtenances). The remaining \$727,000 is attributable to direct labor – primarily design and engineering, civil and site work, and electrical construction – and allocated PECO overhead and management costs. PennDOT will be reimbursing PECO for the cost of the project. PECO will build and own the proposed project.

- 10. If available at the time the LON is filed, please provide a copy of any comments received from state or local officials.**

Not applicable. No comments have been received.

- 11. Please provide the anticipated construction commencement date and the proposed in-service date of the project.**

This project requires a transmission outage. The outage and structure erection work is scheduled to occur between April 19, 2021 and April 23, 2021.

- 12. Provide evidence to show that the size, character, design and configuration of the proposed HV line will not substantially alter its existing right-of-way, if applicable. Please identify all alterations necessary to the existing right-of-way.**

The project involves relocation of an existing monopole approximately 25 feet west of its existing location. No other changes are proposed. The conductors will remain at their existing locations.

See PECO Attachments 1 and 2.

13. A statement identifying the filing date on which the filing of the LON was or is to be made and a statement as found in 57.72(d)(iv) regarding the Commission's review.

PECO's Letter of Notification filing is being made today, March 15, 2021. PECO understands that, pursuant to 57.72(d)(iv), the Commission will review and, by order, approve or disapprove a letter of notification. If the Commission approves a letter of notification, the monopole shall be located and constructed without the application process set forth in this subchapter. If the Commission does not approve the letter of notification, its order shall direct the applicant to comply with the application process set forth in this subchapter.

14. Provide the number of streams and/or wetlands that will be crossed. Describe how these will be addressed. Will any endangered or threatened species be affected? If a PNDI is required, please provide the results.

Not applicable. No streams or wetlands will be crossed as part of the project.

15. Indicate the number of circuits on the proposed line. Note that if only one is being installed at this time, another LON may be needed when the second circuit is added.

This project involves the construction of one new monopole on a single circuit.

16. Please provide a copy of the certificate of service.

The certificate of service is attached to the filing.

17. Provide the specific NERC or other regulatory standard criteria which is driving the proposed project (e.g. TPL-004-1, P.2).

Not applicable.

18. Explain why the NERC, or other regulatory standard, violation, is now an issue where it wasn't previously.

Not applicable.

19. Explain whether the proposed project meets NERC or PJM minimum planning criteria or whether it exceeds these criteria to meet transmission owner planning criteria. If the project exceeds either of these minimum planning criteria to meet transmission owner criteria, provide a detailed explanation as to why.

See PECO's Answer to Question 5b, above. PECO notes that this project is required to meet the NESC requirements (even without PECO's additional safety margins discussed in the response to Question 5b). The additional PECO safety margin does not materially add to the complexity or cost of the project.

This project does not affect transmission flows and is thus not subject to PJM minimum planning criteria. *See* PECO Answer to Question 8.

20. Explain whether load growth in the area has led to any change in circumstances as it relates to the need for the proposed project. If so, quantify these load growth impacts.

Not applicable. This project is not related to load growth.

21. State the age and anticipated service life and describe the overall health of the transmission line facilities to be replaced. Additionally, include information related to conditions which may have accelerated aging or led to premature failure of the facilities (e.g. corrosive environment).

The need for this project is not related to the age or condition of the existing structures.

The structures were originally erected in 1984. PECO's maintenance procedures require a comprehensive inspection of its transmission structures every 5 years. The last inspection on the 220-64 line was performed in 2016, and the line was found to be in acceptable/satisfactory condition.

The service life of the new transmission monopoles and appurtenances is expected to be more than 40 years.

22. Provide information regarding any unplanned outages on the subject transmission facilities over the previous 5 years (or more), including the duration, cause, whether service to customers was interrupted by outages on the subject transmission line(s), and if so, the number and type of customers which were impacted. Additionally, explain whether the proposed project would mitigate the effects of these outages.

There have been two unplanned outages on this line in the past 10 years, neither of which involved this section of the line or would have been mitigated by this project. No customers lost service during these outages; the PJM transmission system absorbed the outage and continued to operate without interruption. **Outage information is Confidential and is being provided only in the Confidential version being provided to the Commission.**

23. Explain whether alternative solutions were considered. If so, provide a brief description of the alternative(s) and provide a detailed explanation of why the chosen solution was selected.

No alternate solutions were considered.

24. Explain whether any of the loads served by the transmission facilities to be replaced are considered to be critical customers.

The 220-64 line is an integrated part of the PJM transmission system and thus does not serve individual customers.

25. Quantify the anticipated increase in reliability in terms of customer average interruption duration index, system average interruption duration index, and system average interruption frequency index.

Not applicable. The 220-64 line has not experienced any outages related to this structure.

26. If a transmission owner customer requested the proposed project and is not paying the entire cost, explain why the costs will be assumed by other transmission owner customers.

PennDOT will be reimbursing PECO for the cost of the project.

27. Provide a detailed description of the methodology used to determine that the subject transmission facilities have reached the end of their useful service life. Additionally, provide any survival curves or utility specific data used in this determination.

Not applicable. The need for this project is not related to the useful service life of the existing structures.

Revised October 2018