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

April 8, 2021

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

DATE OF DEPOSIT
APR 08 2021
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Application of PECO Energy Company for Approval of the Transfer by Sale to the Borough of Narberth of Street Lighting Facilities located in Delaware County, Pennsylvania
Docket No.: A-2021-3024438 / Docket No.: U-2021-3024439
Utility Code: 110550

Dear Secretary Chiavetta:

Enclosed on behalf of PECO Energy Company ("PECO") are Responses to Data Requests of the Bureau of Technical Utility Services ("TUS"), Set I, relating to PECO's Application for approval of the transfer by sale to the Borough of Narberth for Street Lighting Facilities located in Delaware County, Pennsylvania.

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

Respectfully submitted,



Jack R. Garfinkle
Associate General Counsel

Enclosures

cc: Jordan Van Order – Email Only (jvanorder@pa.gov)

APPLICATION OF PECO ENERGY :
COMPANY FOR APPROVAL OF THE :
TRANSFER BY SALE TO THE : DOCKET NO.: A-2021-3024438
BOROUGH OF NARBERTH OF : DOCKET NO.: U-2021-3024439
STREET LIGHTING FACILITIES :
LOCATED IN DELAWARE COUNTY, :
PENNSYLVANIA :

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Response of PECO Energy Company
To Data Requests of Technical Utility Services

PA PUBLIC UTILITY COMMISSION
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TUS-I-1:

Reference the Agreement, Paragraph 6. The written and numerical value for street light poles is inconsistent. Please reconcile.

Response:

PECO erroneously included a typo in paragraph 6 of the Application referencing the written and numerical values of the facilities.

PECO hereby submits the below as corrected paragraph 6 of its application as follows:

Applicant proposes to transfer to Transferee by Agreement of Sale, a copy of which is attached hereto as Attachment "A" (the "Agreement of Sale"), certain street lighting Facilities presently owned by Applicant and dedicated to street lighting service on dedicated streets and located on and within the boundaries and property of the Borough of Narberth. The Assets proposed to be transferred by the Applicant consist of three hundred fifteen (315) street light luminaries; three hundred (300) street light brackets; and twenty-two (22) poles. Also included in the sale are the existing conductors extending from the luminaries to the Applicant's secondary wires in the case of aerial fed lights.

Please do not disclose the Confidential and Proprietary information contained herein, which is being provided in response to a PUC investigation. This document contains information that is exempt from disclosure under 66 Pa.C.S § 335(d) of the Pennsylvania Public Utility Code and 65 Pa.C.S. § 67.708 of Pennsylvania's Right to Know Law. PECO expressly does not waive any rights it has with respect to Privilege or Confidentiality.

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TUS-I-2:

Reference the Agreement, Exhibit B. The service life used for luminaires, brackets, and poles appears to be the same. Please explain how the service life of these separate assets is comparable.

Response:

PECO utilizes the group method of depreciation. The average service life for PECO's assets in FERC Account 373 – Street Lighting and Signal Systems (which includes lamps, brackets and poles etc.) is 24 years. The 24 - year service life is used in the Company's filing, Exhibit "A" Street Lighting Facilities for luminaires, brackets and poles. The determination of the average service lives of PECO's assets is based on the results of the depreciation study conducted by Gannett Fleming which included statistical analyses of PECO's historical data, discussions with subject-matter experts and consideration of the current practices in the broader utility industry. The average service life information for FERC Account 373 was reflected in "PECO's 2018 Electric Distribution, General and Common Plant Service Life Study Report" which was filed with the Commission on June 29, 2020 (Docket # M-2020-3020570).

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PENNSYLVANIA :

VERIFICATION

I, Richard G. Webster, Jr., hereby state that the facts set forth in PECO's Responses to the Bureau of Technical Utility Services' Data Requests, TUS-1 through TUS-2, 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 a hearing held in this matter. I understand that the statements herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to false statements to authorities).

Date: April 8, 2021



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

DATE OF DEPOSIT

APR - 8 2021

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

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AMY BOTAK

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PHILADELPHIA, PA 19103
UNITED STATES US

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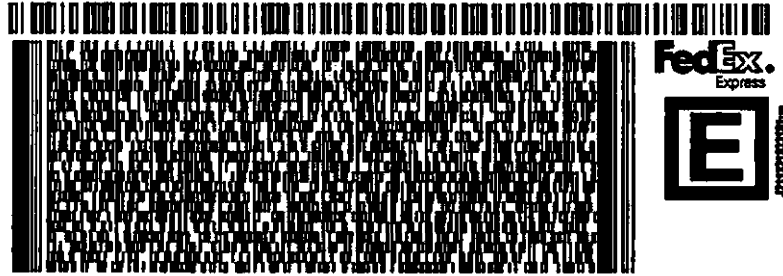
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PENNSYLVANIA PUBLIC UTILITY COMMISS
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, 2ND FLOOR
HARRISBURG PA 17120**

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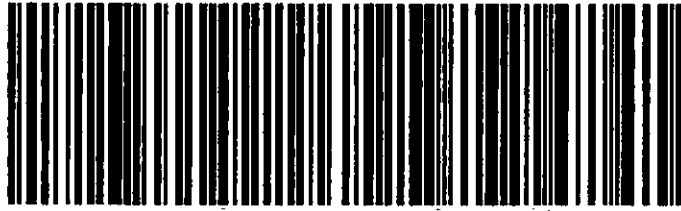
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APR 15 2021
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