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Mary 18, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Application of PECO Energy Company for Approval of the Acquisition of Used or Useful Property (the Chester and Delaware Tap Substations) from an Affiliated Interest (Exelon Generation Company)
Docket No. A-2021-3025080 and Docket No. G-2021-3025092

Dear Secretary Chiavetta:

Enclosed please find PECO Energy Company's Answer to the Bureau of Technical Utility Services' Data Request dated May 14, 2021.

If you have any questions regarding this filing, please do not hesitate to contact me. Thank you for your attention to this matter.

Very truly yours,

/s/ Christopher A. Lewis

Christopher A. Lewis
Counsel for PECO Energy Company

CAL/jm
Enclosures

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PECO Energy Company	:	
for approval of the Acquisition	:	Docket No. A-2021-3025080
of Used or Useful Property	:	
(at the Chester and Delaware Tap	:	
Substations)	:	Docket No. G-2021-3025092
from an Affiliated Interest	:	
(Exelon Generation Company, LLC)	:	
	:	
	:	

**ANSWER OF PECO ENERGY COMPANY TO THE DATA REQUEST OF THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
BUREAU OF TECHNICAL UTILITY SERVICES**

PECO Energy Company hereby provides the following answers to the May 14, 2021 Data Request of the Bureau of Technical Utility Services (“TUS”) of the Pennsylvania Public Utility Commission.

Dated: May 18, 2021

/s/ Christopher A. Lewis

Christopher A. Lewis, Esq.

Joel Michel, Esq.

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Bureau of Technical Utility Services
Energy Industry Group

Docket Nos. A-2021-3025080 & G-2021-3025092
PECO Energy Company
Data Request

TUS-3. Reference the TUS Data Requests, Response to TUS-1. The response does not fully address the question. Please provide a detailed explanation as to why PECO will provide compensation in the amount of \$900,000 to ExGen for the subject property when PECO previously sold the subject property to ExGen for compensation in the amount of \$1.00.

ANSWER:

The transfer of the Richmond property from PECO to Exelon Generation occurred pursuant to PECO's 1998 Restructuring Settlement in Docket Nos. R-00973953 and P-00971265. Pursuant to the Commission's December 23, 1997 Opinion and Order, PECO was allowed to recover \$5.024 billion of its stranded investment in the generation assets transferred to Exelon Generation. The \$1 recited in the deed refers to nominal consideration, not actual consideration.

TUS -4. Reference TUS Data Requests, Response to TUS-2. Please clarify whether Delco Tap Substation and Delaware Tap Substation are the same substation.

ANSWER:

Yes, Delco Tap and Delaware Tap are the same substation.

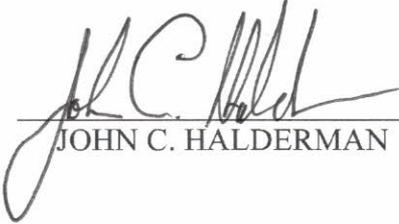
TUS-5. Reference the application, Paragraph 12. The acreage is not consistent with the 19.09 acres stated in Exhibit C, Page 1. Please explain.

ANSWER:

The appraisal attached as Exhibit C states the property is “approximately” 19.09 acres. The survey which was done after the appraisal shows the actual acreage is 17.94 acres. This discrepancy has no impact on the fair market value of the property. The appraisal indicates that the entire FMV is based on the value of 9 “usable acres” not already occupied by PECO facilities at \$100,000 per acre. *See Exhibit C, at 38.*

VERIFICATION

I, John C. Halderman, hereby state that the facts above set forth 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 made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



JOHN C. HALDERMAN