

Jennedy S. Johnson  
Assistant General Counsel

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Jennedy.Johnson@exelconcorp.com

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

August 18, 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 Replace One Structure in Plymouth Township, Montgomery County, Pennsylvania  
Docket No. A-2021-

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PECO Energy Company is a Letter of Notification (“LON”) requesting approval to Replace One Structure in Plymouth Township, Montgomery County, Pennsylvania. This LON is filed pursuant to the Pennsylvania Public Utility regulations at 52 Pa. Code § 57.72(d)(1).

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; the public version of Attachment 3 has been included with the filing package.

Should you have 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 REPLACE :  
ONE TRANSMISSION : Docket No. A-2021-\_\_\_\_\_  
STRUCTURE IN PLYMOUTH :  
TOWNSHIP, MONTGOMERY :  
COUNTY, PENNSYLVANIA :**

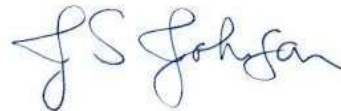
**CERTIFICATE OF SERVICE**

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 OR HARD COPY (WHERE NO  
EMAIL IS LISTED):**

Christopher G. Manero, Council President, Chair Plymouth Township Counsel 700 Belvoir Road Plymouth Meeting, PA 19462 <a href="mailto:cmanero@plymouthtownship.org">cmanero@plymouthtownship.org</a>	James Wallace, Code Enforcement Director Plymouth Township 700 Belvoir Road Plymouth Meeting, PA 19462 <a href="mailto:jwallace@plymouthtownship.org">jwallace@plymouthtownship.org</a>
Karen B. Weiss, Township Manager Plymouth Township 700 Belvoir Road Plymouth Meeting, PA 19462 <a href="mailto:kweiss@plymouthtownship.org">kweiss@plymouthtownship.org</a>	David Conroy, Zoning/Planning Officer Plymouth Township 700 Belvoir Road Plymouth Meeting, PA 19462 <a href="mailto:dconroy@plymouthtownship.org">dconroy@plymouthtownship.org</a>

<p>Dr. Valerie A. Arkoosh, Chair  Montgomery County Board of  Commissioners  P.O. Box 311  Norristown, PA 19404  <a href="mailto:val@montcopa.org">val@montcopa.org</a></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, 5<sup>th</sup> Floor  Harrisburg, PA 17120</p>	<p>Nancy Moses, Chair  Pennsylvania Historical and Museum  Commission  State Museum Building  300 North Street  Harrisburg, PA 17120</p>
<p>Richard A. Kanaskie, Director  Pennsylvania Public Utility Commission  Bureau of Investigation &amp; Enforcement  Commonwealth Keystone Building  400 North Street  Harrisburg, PA 17120  <a href="mailto:rkanaskie@pa.gov">rkanaskie@pa.gov</a></p>	<p>Teresa Reed Wagner, Executive Director  Office of Small Business Advocate  555 Walnut Street  1<sup>st</sup> Floor, Forum Place  Harrisburg, PA 17101  <a href="mailto:tereswagne@pa.gov">tereswagne@pa.gov</a></p>
<p>Christine M. Hoover, Esq.  Office of Consumer Advocate  555 Walnut Street  5<sup>th</sup> Floor, Forum Place  Harrisburg, PA 17101-1923  <a href="mailto:choover@paoca.org">choover@paoca.org</a></p>	



Dated: August 18, 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](mailto:jennedy.johnson@exeloncorp.com)

**BEFORE THE  
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PECO ENERGY COMPANY, FILED :  
PURSUANT TO 52 PA. CODE :  
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STRUCTURE IN PLYMOUTH :  
TOWNSHIP, MONTGOMERY :  
COUNTY, PENNSYLVANIA :**

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**LETTER OF NOTIFICATION**

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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 structure consisting of three wood poles that are 57 years old and at end of life.

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, S23-1  
Philadelphia, PA 19103  
215.841.4353  
[jennedy.johnson@exeloncorp.com](mailto: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 Plan and Profile Drawing
- Attachment 2 Steel Tubular Monopole Structure
- Attachment 3 Letter of Notification Filing Checklist<sup>1</sup>

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).

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<sup>1</sup> The confidential version of Attachment 3 has been filed with Secretary Chiavetta; the version included with this filing is the public version.

## **II. THE PROJECT**

### **A. Need for the Project**

8. This project involves the construction of one new transmission monopole (“new Structure 0-5”) to replace the existing structure – consisting of three wood poles that are 57 years old and at end of life. The existing poles have significant longitudinal cracking, bird holes, and rot.

### **B. Description of the Proposed Project**

9. Structure 0-5 is a three-pole wood structure that is located inside of PECO’s wood pole storage yard at the Gallagher Road facility in Plymouth Meeting, just outside the fence of the Plymouth Meeting Substation. Structure 0-5 (both existing and new) is located on PECO’s 130-35 line (Plymouth Meeting Substation to Bryn Mawr Substation), which is 9.83 miles long and comprised of 105 structures. Structure 0-5 is the last remaining wood pole structure on the line; all other structures are steel towers or steel tubular monopoles with concrete drill-pier foundations. New Structure 0-5 will be a 60’ tall tubular monopole, similar in height to the existing wood poles, and located approximately 25’ north of the existing structure.

10. New Structure 0-5 will be of similar size and height as the existing structure. The steel tubular monopole with concrete drill-pier foundations is shown in Attachment 2.

11. The total estimated cost of the Project is approximately \$500,000. As the owner of the 130-35 line, PECO will finance and build the proposed project.

12. Upon Commission approval, the Project has a scheduled construction start date of November 11, 2021

## **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 inside PECO’s wood pole storage yard at its Gallagher Road facility in Plymouth Meeting, which is located just outside the fence of PECO’s Plymouth Meeting Substation.

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

18. The closest airport to the Project area is Wings Field airport, which is located approximately 3.0 miles northeast of new Structure 0-5. 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).

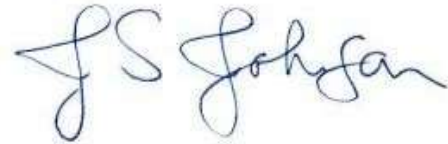
25. The proposed Project qualifies for use of a Letter of Notification because the new High Voltage transmission structure impacts less than two miles of the circuit.

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 structure consisting of three wood poles that are 57 years old and at end of life.

Respectfully submitted,



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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](mailto:anthony.gay@exeloncorp.com)  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)  
[jennedy.johnson@exeloncorp.com](mailto:jennedy.johnson@exeloncorp.com)

Dated: August 18, 2021

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**PECO ENERGY COMPANY, FILED** :  
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**STRUCTURE IN PLYMOUTH** :  
**TOWNSHIP, MONTGOMERY** :  
**COUNTY, PENNSYLVANIA** :

**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).

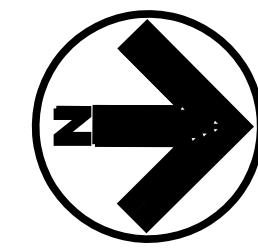


Date: Aug. 18, 2021

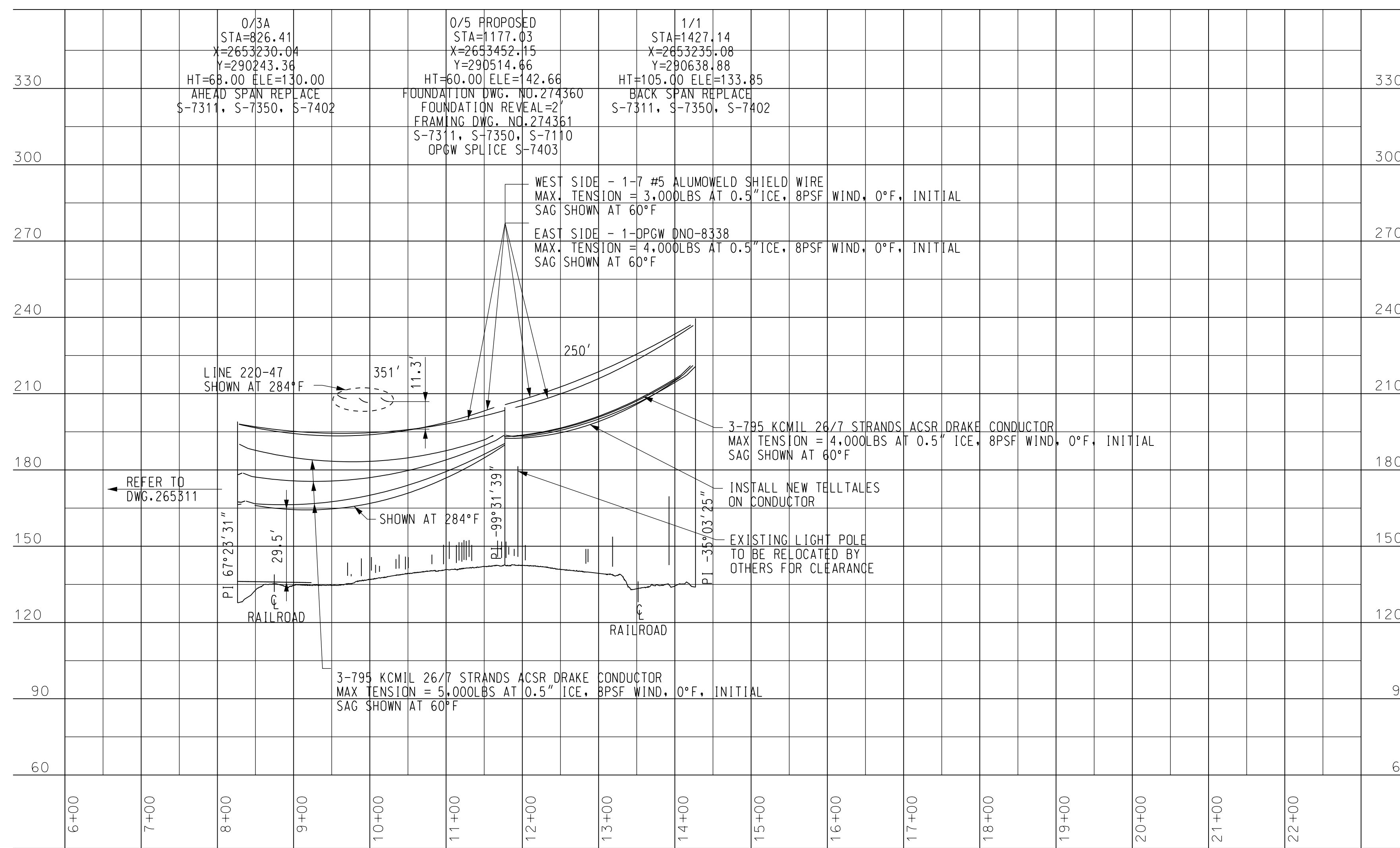
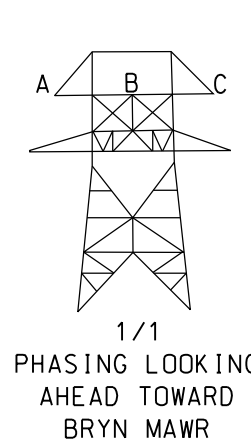
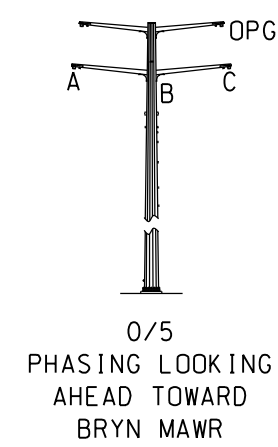
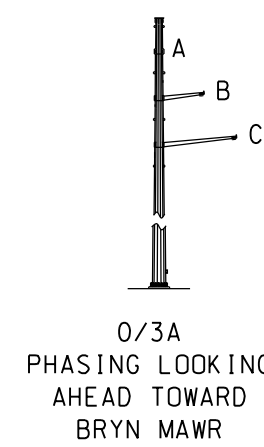
\_\_\_\_\_  
Brian D. Crowe  
Vice President of Transmission  
and Substation

# Attachment 1

## Page 1 of 1



- LEGEND**
- NEW POLE
  - ⊙ LIGHT POLE
  - ⊠ EXISTING TOWER
  - EXISTING POLE
  - - - - T-LINE CENTERLINE
  - ⊗ EXISTING POLE TO BE REMOVED
  - +++++ RAILROAD



**SCOPE OF WORK:**

- EXISTING STR. 0/5 WOOD POLES AND GUYS TO BE REPLACED WITH STEEL POLE.
- INSTALL NEW CONDUCTOR FROM STR. 0/3A TO STR. 1/1. REPLACE EXISTING HARDWARE AT CONNECTION.
- INSTALL NEW OPGW SPLICE AT STR. 0/5. INSTALL NEW OPGW FROM STR. 0/5 BACK TO PLYMOUTH MEETING SUB. SEE DWG. NO. 265311 FOR OPGW ASSEMBLIES.

**GENERAL NOTES**

- CONTRACTOR/INSTALLER SHALL TAKE ALL APPROPRIATE PRECAUTIONS TO ENSURE THE SAFETY OF ALL PEOPLE LOCATED ON THE WORK SITE, INCLUDING CONTRACTOR'S/INSTALLER'S PERSONNEL (OR THAT OF ITS SUBCONTRACTOR(S)) PERFORMING THE WORK.

**REFERENCE DRAWINGS:**

PLAN AND PROFILE	274364, 265311
FOUNDATION DRAWING	274360
STRUCTURE STAKING DRAWINGS	274359
FRAMING DRAWINGS	274361
STRINGING CHART	274362



**GRAPHIC SCALE**

VERTICAL SCALE 1"=30'  
HORIZONTAL SCALE 1"=100'

REV	DATE	DESCRIPTION	PREPARED	REVIEWED	APPROVED
A2	07/30/2021	ISSUE FOR CONSTRUCTION	SL	RG	ML
A1	06/04/2021	ISSUE FOR APPROVAL	SL	RG	ML



**Sargent & Lundy**

PROFESSIONAL CERTIFICATION: I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A QUALIFIED LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF PENNSYLVANIA, LICENSE NO. 0001080800.

DATE: 07/30/21

Signature: RGT

TABLE OF ADDITIONS & CHANGES  
USE ONLY PRINTS SHOWING LATEST DATE

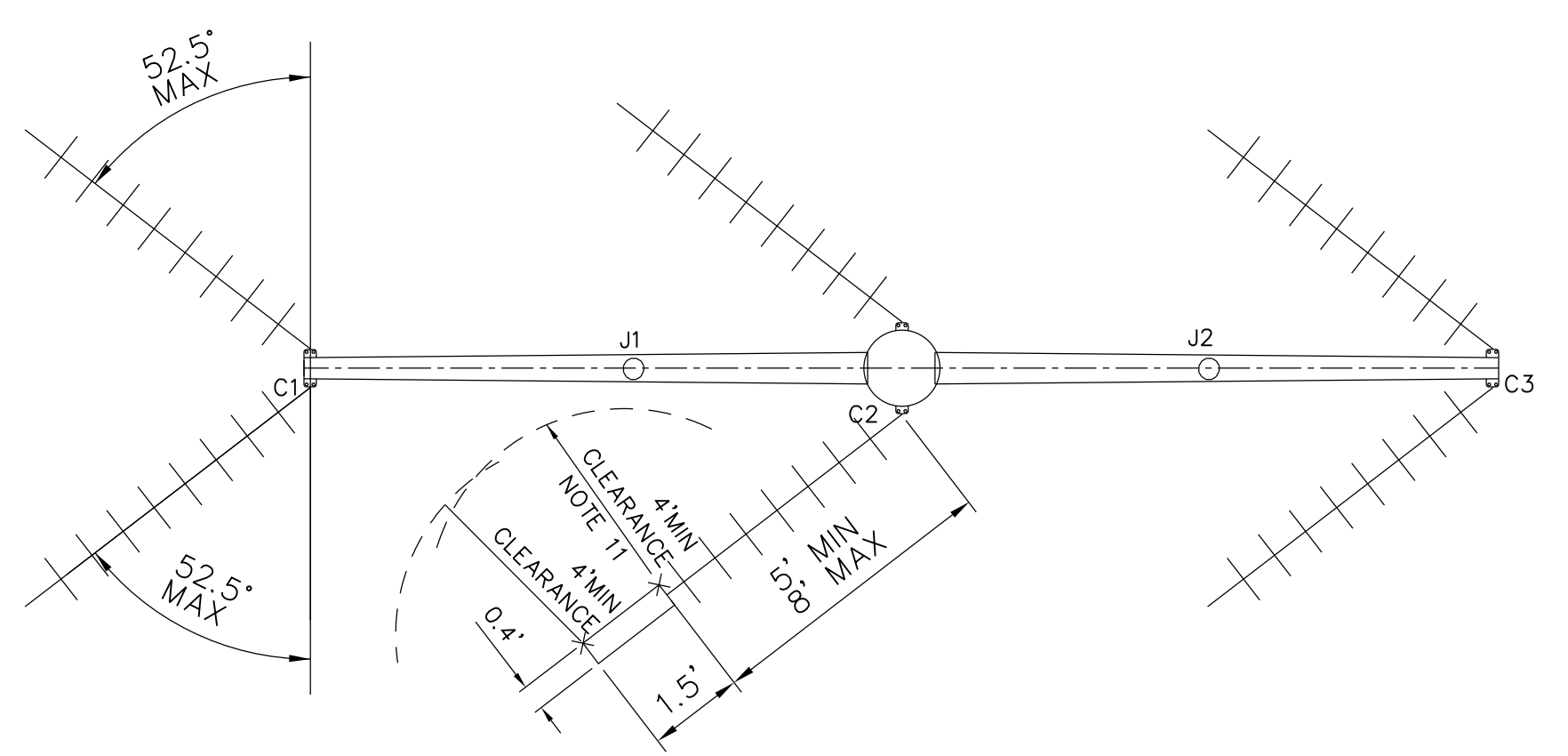
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A2	07/30/21	EC# 252137 W0# 17051130 ADDED THIS DRAWING ISSUE FOR CONSTRUCTION	SL	RG	ML

CIVIL		PLAN AND PROFILE 138KV DE STRUCTURE 0/5 130-35 LINE			
PLYMOUTH MEETING TO BRYN MAWR PECO Energy Company					
SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED DATE
NONE	SL	CB	RG		07/30/21
APPROVED				APPROVED	
APPROVED				APPROVED	
APPROVED				APPROVED	
SHEET 1 OF 1		C-274364-A2			

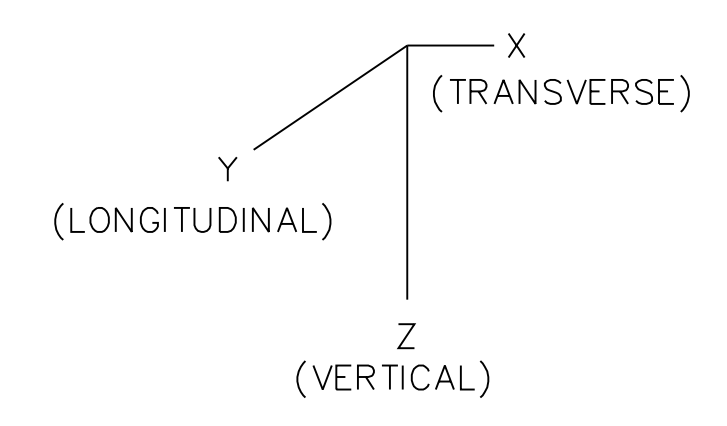
# Attachment 2 Page 1 of 1

		LOADING TABLE *									
ITEMS	LOADS	LOAD CASE									
		LC #1	LC #2	LC #3	LC #4	LC #5	LC #6	LC #7A	LC #7B	LC #8	LC #9
STATIC WIRE AND OPGW S1, S2	Sx	13.5	6.8	10.4	6.4	7.1	0.6	9	9	8.2	3.3
	Sy	0	0	0	0	5.3	8.3	0	0	0	0
	Sz	2.9	1.7	3.2	3	2.2	2.2	3.5	2.6	2.2	1.6
138KV CONDUCTOR C1, C2, C3	Cx	16.3	9.2	12.9	8.2	8.6	0.6	9.8	9.8	9.8	4.1
	Cy	0	0	0	0	6.4	10	0	0	0	0
	Cz	4.7	2.8	4.7	4.9	4.7	4.7	6.3	4.5	3.4	2.6
WIND ON STRUCTURE	W	10	31.25	4	0	10	10	4	4	4	0
	INTACT WIRE	INTACT WIRE	INTACT WIRE	INTACT WIRE	ANGLE DEADEND	TANGENT DEADEND	INTACT WIRE	INTACT WIRE	INTACT WIRE	INTACT WIRE	

\*\* X, Y & Z IN KIPS, W IN PSF



PLAN VIEW



**WIRE DATA:**

- OPGW 36 FIBER AC-92/614 DNO-8338  
5,000 LBS AT 4 PSF WIND,  
0.5" RADIAL ICE, 0°F,  
INITIAL TENSION
- STATIC WIRE 7 #5 ALUMOWELD  
5,000 LBS AT 4 PSF WIND,  
0.5" RADIAL ICE, 0°F,  
INITIAL TENSION
- 138kv CONDUCTOR 795 KCMIL 26/7 ACSR "DRAKE"  
6,000 LBS AT 4 PSF WIND,  
0.5" RADIAL ICE, 0°F,  
INITIAL TENSION

**SPAN AND ANGLE DATA:**

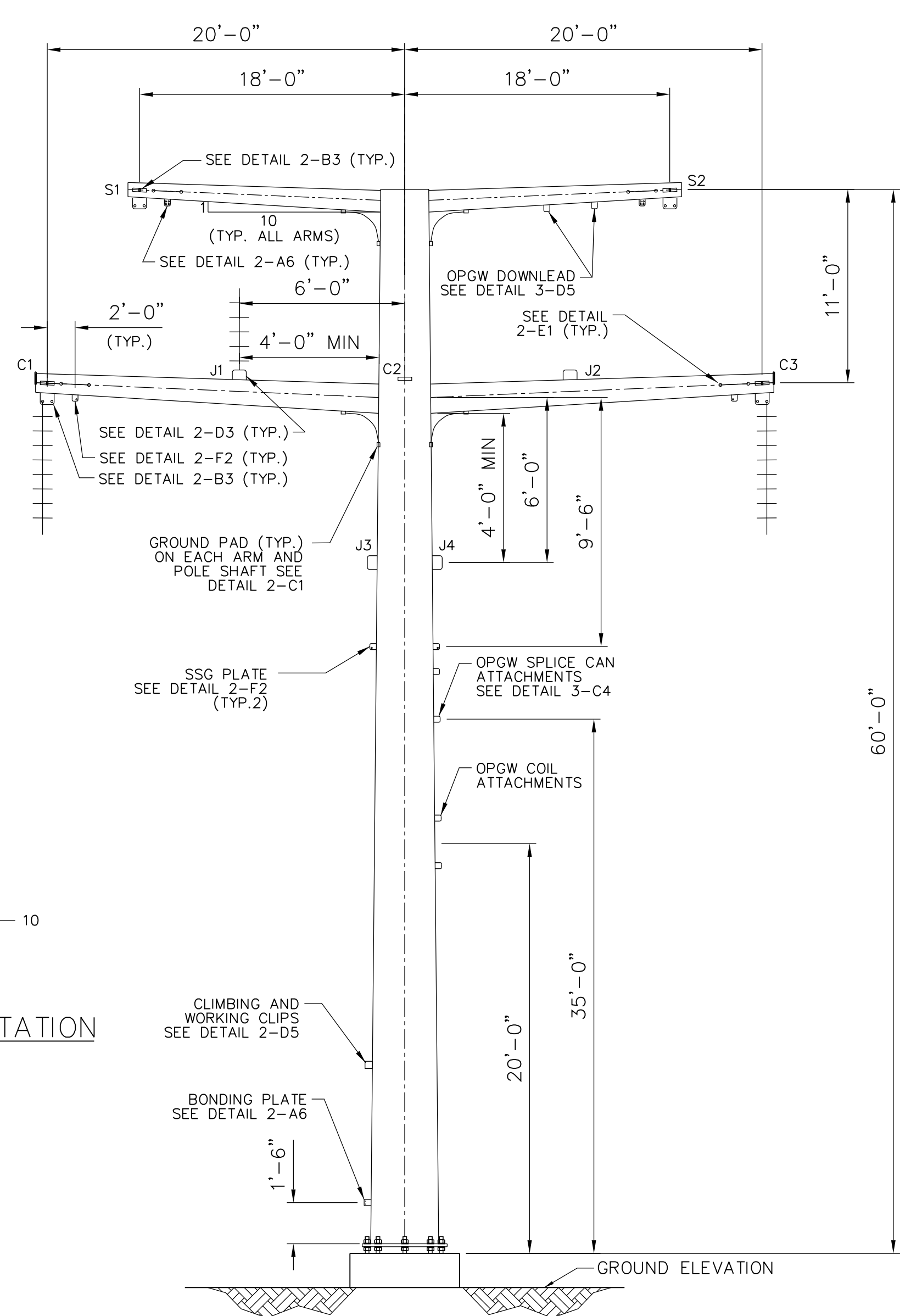
- VERTICAL (WEIGHT) SPAN: 800'
- HORIZONTAL (WIND) SPAN: 400'
- LINE ANGLE: 0-105°
- RULING SPAN: 400'

**NOTES:**

1. W = WIND ON PROJECTED AREA OF POLE AND ARMS WITH LOAD FACTORS. POLE FABRICATOR TO SELECT ORIENTATION OF THE WIND THAT CREATES MAXIMUM BENDING MOMENT.
2. CONDUCTOR LOADS AND STATIC WIRE LOADS ARE PER PHASE.
3. ALL LOADS ARE DESIGN LOADS WITH LOAD FACTORS.
4. VERTICAL LOADS AT CONDUCTOR ATTACHMENT POINTS INCLUDE HARDWARE AND INSULATOR WEIGHTS PLUS 500 LBS.
5. THE DIFFERENCE BETWEEN POLE TOP HORIZONTAL DEFLECTION UNDER LOAD CASE 8 AND LOAD CASE 9 SHALL BE LIMITED TO 4% OR LESS OF OVERALL STRUCTURE HEIGHT.
6. DESIGN PER PECO SPEC EPP-2070 AND FAB. PER TSE-01-05.
7. PROVIDE CLOSURE AT END OF ALL OPEN TUBES.
8. FABRICATOR TO FURNISH ANCHOR BOLTS, ERECTION BOLTS, NUTS AND LOCK WASHERS.
9. FABRICATOR TO FURNISH FACTORED FOUNDATION LOADS WITH INITIAL PROPOSAL.
10. STEEL STRUCTURE SHALL BE CONSTRUCTED OF WEATHERING STEEL.
11. FABRICATOR SHALL ADJUST LENGTH OF ATTACHMENT PLATES TO ACCOMMODATE CLEARANCE TO STRUCTURE.
12. DIMENSIONS AT THE ARMS SHOW DISTANCES BETWEEN CENTER OF ATTACHMENT POINTS. ARM LENGTH TO BE CALCULATED ACCORDINGLY.
13. BRACKETS FOR JUMPER POST INSULATORS TO BE INSTALLED AT J1, J2, J3, AND J4 SEE DETAIL 2-D3.
14. TWO (2) LUGS WITH 2" DIA. HOLES REQUIRED FOR LIFTING PURPOSES ON OPPOSITE SIDES (FLAT 1 AND 7) AT 1" UNDER TOP OF POLE.

**STRUCTURAL LOADING CRITERIA:**

- LOADING CONDITION 1 (NESC HEAVY)  
ALL WIRES INTACT, NESC LOAD FACTORS  
4 PSF WIND, 0.5" RADIAL ICE, 0°F, INITIAL  
LF = 1.65 TENSION LOADS  
2.50 WIND  
1.50 VERTICAL LOADS INCLUDING STRUCTURE WEIGHT
- LOADING CONDITION 2 (PECO EXTREME WIND)  
ALL WIRES INTACT  
25 PSF WIND, NO ICE, 60°F, INITIAL  
LF = 1.1 ON ALL LOADS
- LOADING CONDITION 3 (PECO EXTREME ICE WITH CONCURRENT WIND)  
ALL WIRES INTACT  
4 PSF WIND, 1.0" RADIAL ICE, 15°F, INITIAL  
LF = 1.0 ON ALL LOADS
- LOADING CONDITION 4 (PERSONNEL SUPPORT)  
ALL WIRES INTACT  
NO WIND, NO ICE, 60°F, FINAL  
LF = 2.0 ON ALL LOADS
- LOADING CONDITION 5 (NESC HEAVY-ANGLE DE)  
ALL WIRES INTACT ON ONE SIDE ONLY  
4 PSF WIND, 0.5" RADIAL ICE, 0°F, INITIAL  
LF = 1.65 TENSION LOADS  
2.50 WIND  
1.50 VERTICAL LOADS INCLUDING STRUCTURE WEIGHT
- LOADING CONDITION 6 (NESC HEAVY-TANGENT DE)  
ALL WIRES INTACT ON ONE SIDE ONLY  
4 PSF WIND, 0.5" RADIAL ICE, 0°F, INITIAL HEAVY  
LF = 1.65 TENSION LOADS  
2.50 WIND  
1.50 VERTICAL LOADS INCLUDING STRUCTURE WEIGHT
- LOADING CONDITION 7A (CONSTRUCTION-HEAVY VERTICAL)  
ALL WIRES INTACT  
2 PSF WIND, NO ICE, 30°F, INITIAL  
LF = 2.0 ON ALL LOADS
- LOADING CONDITION 7B (CONSTRUCTION-HEAVY VERTICAL)  
ALL WIRES INTACT  
2 PSF WIND, NO ICE, 30°F, INITIAL  
LF = 2.0 ON ALL LOADS
- LOADING CONDITION 8 (DEFLECTION)  
ALL WIRES INTACT  
4 PSF WIND, 0.5" ICE, 0°F, INITIAL  
LF = 1.0 ON ALL LOADS  
HORIZONTAL DEFLECTION LIMIT: 4% OF STRUCTURE HEIGHT
- LOADING CONDITION 9 (PRE CAMBER)  
ALL WIRES INTACT  
NO WIND, NO ICE, 60°F, FINAL  
LF = 1.0 ON ALL LOADS



ELEVATION VIEW

STRUCTURE TABLE			
STRUCTURE NO.	H	LINE ANGLE	STR. HUB GROUND ELEV.
0/5	60'	105°	142.83'

**REFERENCE DRAWINGS:**

138KV DEAD END STRUCTURE DETAILS C-274358 SHT.2 THRU 3

PECO TAPERED TUBULAR STEEL STRUCTURES SPECIFICATION\_TSE-01-05

REV	DATE	DESCRIPTION	SL	RG	ML
A3	04/28/2021	ISSUE FOR VENDOR DESIGN			
A2	04/19/2021	ISSUE FOR VENDOR DESIGN			
A1	04/05/2021	ISSUE FOR APPROVAL			

**Sargent & Lundy**

PROFESSIONAL CERTIFICATION, I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME AND THAT I AM A LICENSED PROFESSIONAL ENGINEER IN THE STATE OF PENNSYLVANIA, LICENSE NO. PE006202.

DATE: 04/28/21

ANY MODIFICATION OR ADDITION TO THIS DRAWING BY ANY ORGANIZATION OTHER THAN SARGENT & LUNDY IS NOT THE RESPONSIBILITY OF SARGENT & LUNDY

6810 DEERPATH RD., ELK RIDGE, MD

TABLE OF ADDITIONS & CHANGES USE ONLY PRINTS SHOWING LATEST DATE					
NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A1	04/05/21	EC# 252137 WO# 17051130 ADDED: THIS DRAWING ISSUE FOR APPROVAL	SL	RG	ML
A2	04/19/21	EC# 252137 WO# 17051130 ADDED: THIS DRAWING ISSUE FOR VENDOR DESIGN	SL	RG	ML
A3	04/28/21	EC# 252137 WO# 17051130 ADDED: THIS DRAWING ISSUE FOR VENDOR DESIGN	SL	RG	ML

STRUCTURAL

STRUCTURE LOADING  
138kv DE STR. 0/5  
130-35 LINE

PLYMOUTH MEETING TO BRYN MAWR  
PECO Energy Company

SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	SL	CB	RG			04/28/21

APPROVED: \_\_\_\_\_ APPROVED: \_\_\_\_\_

APPROVED: \_\_\_\_\_ APPROVED: \_\_\_\_\_

SHEET 1 OF 3      C-274358-A3

**Letter of Notification Filing Checklist**  
**PECO 130-35 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.**

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**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 wood pole Structure 0-5 that is at end of life. Structure 0-5 is a three-pole wood structure that is located inside of PECO's wood pole storage yard at the Gallagher Road facility in Plymouth Meeting, just outside the fence of our Plymouth Meeting Substation. The 130-35 line (Plymouth Meeting Substation to Bryn Mawr Substation) is comprised of 105 structures and is 9.83 miles long. Structure 0-5 is the last remaining wood pole structure on the line. All other structures are steel towers or steel tubular monopoles with concrete drill-pier foundations. Structure 0-5 will be relocated approximately 25'-0" north of the existing structure.

The proposed project is located entirely within the Plymouth Township, Montgomery County, 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 reconductored 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 11, 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 work is approximately 0.15 miles.

**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 existing 130-35 line is operated at 138 kV and is part of the national bulk electric system. Existing Structure 0-5 consists of three wood poles that are 57 years old and at end of life. The poles have significant longitudinal cracking, bird holes, and rot. The new pole will be located approximately 25' north of the existing structure. The new structure will be a 60' tall tubular monopole and will be similar in height to the existing wood poles.

**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) Provide an analysis of minimum conductor clearances and conductor thermal ratings.

Conductor clearances for the project meet or exceed the requirement 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 section b, below. The existing conductor will not be replaced.

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

Ground, Farmland	23.6'
Roadways, Driveways, Parking lots	23.6'

Railroads, above top or rail	31.6'
Area not accessible by vehicles	19.6'

A small segment of 795 kcmil 26/7 ACSR “Drake” conductor will be spliced in between Structure 0-3 to Structure 1-1 due to the longer span length. The Drake conductor matches the existing conductor, and the existing rating will remain. The existing conductor from Structure 1-1 will be transferred to new Structure 0-5.

- 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.

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. The existing structure, which is 61 feet high, will be removed once the new structure has been erected and the conductors are transferred over. See also PECO Attachment 1, which is a Plan and Profile of the project showing the location of the proposed tower in relationship to existing structures. PECO Attachment 1 is also being provided to Commission Staff in electronic format.

New Structure Number	Height (ft)	Location compared to existing structure
0-5	60	About 25ft north of existing structure 0-5; the new structure will be located on the existing transmission line alignment.

- 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 \$500,000. \$225,000 of that total is attributable to materials (e.g., new monopoles, foundation, and appurtenances). The remaining \$275,000 is attributable to direct labor – primarily design and engineering, civil and site work, and electrical construction – and allocated PECO overhead and management costs. As the owner of the 130-35 line, PECO will finance and build 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 for the structure erection and wire transfer work is currently scheduled for 11/17/2021 to 11/19/2021.

- 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 replacement of one existing structure and replacement of a small section of conductor as described in Question 6. No other changes are proposed. The conductors will remain in a similar location. 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, August 18, 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 structure 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 138 kV 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.**

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

- 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).**

Structure 0-5 consist of 3 wood poles that are 57 years old and at end of life. The poles have significant longitudinal cracking, bird holes, and rot.

PECO’s maintenance procedures require a comprehensive inspection on all transmission structures on a 5-year periodicity. The last inspection of the 130-35 line was in 2020. Structure 0-5 was identified to have pole top rot, checking (longitudinal cracking), and several bird holes. The remaining line and structures were found to be in acceptable/satisfactory condition. The service life of the new transmission monopoles and appurtenances is expected to be more than 60 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 has been one unplanned outage on this line in the prior 10 years, which involved this section of the line but would not 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. The date, cause, and duration of the outage was:

**\*\*BEGIN CONFIDENTIAL INFORMATION\*\***

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.....

**\*\*END CONFIDENTIAL INFORMATION\*\***

**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 130-35 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 130-35 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.**

Not applicable. The Structure is at end of life and requires replacement

**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.**

PECO transmission engineering has inspected Structure 0-5 and has determined that deterioration has reduced the structure strength capability below what is required. To ensure the reliability of the 130-35 line, the Structure needs to be replaced.

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