

Jennedy S. Johnson  
Assistant General Counsel

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

January 13, 2022

**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 Five Transmission Structures in East Fallowfield Township and Coatesville, Chester County, Pennsylvania  
Docket No. A-2022-

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PECO Energy Company is a Letter of Notification (“LON”) requesting approval to Replace Five Transmission Structures in East Fallowfield Township and Coatesville, Chester County, Pennsylvania that are at end of life. This LON is filed pursuant to the Pennsylvania Public Utility Commission’s 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 2 to the LON has been emailed directly to Secretary Chiavetta.

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  
Debra Backer, [dbacker@pa.gov](mailto:dbacker@pa.gov)  
Jordan Van Order, [jvanorder@pa.gov](mailto:jvanorder@pa.gov)

**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 :  
FIVE TRANSMISSION : Docket No. A-2022-\_\_\_\_\_  
STRUCTURES IN EAST :  
FALLOWFIELD TOWNSHIP AND :  
COATESVILLE, CHESTER 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):

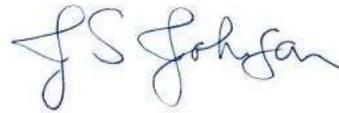
**VIA FIRST CLASS (& ELECTRONIC MAIL WHERE EMAIL IS LISTED):**

<p>Richard A. Kanaskie, Director*          Pennsylvania Public Utility Commission Bureau          of Investigation and 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>Patrick M. Cicero, Acting Consumer          Advocate *          Office of Consumer Advocate          555 Walnut Street          5<sup>th</sup> Floor, Forum Place          Harrisburg, PA 17101-1923  <a href="mailto:pcicero@paoca.org">pcicero@paoca.org</a></p>	<p>Rob McLarnon, Code Enforcement Officer          East Fallowfield Township          East Fallowfield Building Codes &amp;          Enforcement          2264 Strasburg Road          East Fallowfield, PA 19320  <a href="mailto:codeofficer@eastfallowfield.org">codeofficer@eastfallowfield.org</a></p>
<p>Wilson T. Lambert, Jr., Chairman          East Fallowfield Township          East Fallowfield Township Board of Supervisors          2264 Strasburg Road          East Fallowfield, PA19320  <a href="mailto:Board@eastfallowfield.org">Board@eastfallowfield.org</a>  <a href="mailto:wlambert@eastfallowfield.org">wlambert@eastfallowfield.org</a></p>	<p>Ellis Weiss, Chairman          East Fallowfield Township          East Fallowfield Township Zoning Hearing          Board          2264 Strasburg Road          East Fallowfield, PA 49320</p>

<p>Michael Domboski, Chairman  East Fallowfield Township  East Fallowfield Township Planning  Commission  2264 Strasburg Road  East Fallowfield, PA 19320</p>	<p>Scott M. Swichar, Township Manager  East Fallowfield Township  East Fallowfield Township  Administration  2264 Strasburg Road  East Fallowfield, PA 19320  <a href="mailto:manager@eastfallowfield.org">manager@eastfallowfield.org</a>  <a href="mailto:sswichar@eastfallowfield.org">sswichar@eastfallowfield.org</a></p>
<p>Linda Lavender-Norris, City Council  President  City of Coatesville Council  1 City Hall Pl  Coatesville PA, 19320  <a href="mailto:llavendernorris@coatesville.org">llavendernorris@coatesville.org</a></p>	<p>Joe DiSciullo, Chairman  City of Coatesville Redevelopment  Authority  1 City Hall Pl  Coatesville, PA, 19320</p>
<p>John Guerrero, Commissioner  City of Coatesville Planning Commission  1 City Hall Pl  Coatesville PA, 19320</p>	<p>James Logan, City Manager  City of Coatesville  1 City Hall Pl  Coatesville PA, 19320  <a href="mailto:jlogan@coatesville.org">jlogan@coatesville.org</a></p>
<p>Matt Hoffert, Codes Enforcement Officer  City of Coatesville Planning &amp; Codes  Enforcement  1 City Hall Pl  Coatesville, PA 19320</p>	<p>Marian Moskowitz, Chair  Chester County  Commissioners Office  313 West Market Street, Suite  6202  West Chester, PA 19382  <a href="mailto:cocommissioners@chesco.org">cccommissioners@chesco.org</a></p>
<p>Department of Environmental  Protection  Rachel Carson State Office Building  400 Market Street  Harrisburg, PA 17101</p>	<p>Nancy Moses, Chairman  Historical and Museum  Commission  State Museum Building  300 North Street  Harrisburg, PA 17120</p>

Yassmin Gramian, Secretary Department of Transportation Keystone Building 400 North Street, 5 <sup>th</sup> Floor Harrisburg, PA 17120	
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\* Served electronically only



Dated: Jan 13, 2022

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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  
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** :  
**FIVE TRANSMISSION** : **Docket No. A-2022-\_\_\_\_\_**  
**STRUCTURES IN EAST** :  
**FALLOWFIELD TOWNSHIP AND** :  
**COATESVILLE, CHESTER 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 replace five transmission structures that are at the end of life in East Fallowfield Township and Coatesville, Chester County (the “Project”). 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, Profile, and Structure Drawings
- Attachment 2 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 replacement of five (5) wood pole structures that are at end of life with four (4) new steel, single circuit monopole structures and one (1) new steel, single circuit H-frame structure in East Fallowfield Township and Coatesville, Chester County, Pennsylvania. PECO's existing 130-54 line longitudinally traverses 0.66 miles along an existing PECO right of way between PECO's Newlinville Substation located in East Fallowfield Township and the Cliffs Steel Substation located in Coatesville, PA. The need for this project is related to the condition and age of the existing wood structures.

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

9. The existing 130-54 line is 54 years old. The anticipated service life of the line was 50 years. The five wood pole structures that will be replaced have significant rot and are structurally at end of life. PECO's maintenance procedures require a comprehensive inspection on all transmission structures on a five-year periodicity. The last inspection on the 130-54 line was performed in 2018 when the line and structures were found to be in poor condition. A 2021 walkdown for the project identified that both cross arms on Structure 1-5 had failed. The cross arms were reinforced with braces and the line was returned to service. The repair is a temporary fix until the structure replacement project that is the subject of this LON is completed. The total length of construction is approximately 0.66 miles. A map of the proposed Project is provided in Attachment 1.

10. New Structures 1-2, 1-4, and 1-5 will be 20', 5', and 50'<sup>1</sup> taller than the existing structures, respectively. New Structure 1-1 will be 12' shorter than the existing structure and new

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<sup>1</sup> Existing Structure 1-5 is sandwiched between a steep drop off and a distribution line. In order to construct New Structure 1-5, it had to be moved away from the drop off and relocated opposite of the distribution line. This resulted

Structure 1-3 will be the same size as the structure it is replacing. *See* PECO Attachment 1, which contains structure erection drawings and the location of the proposed structures in relationship to existing structures; *see* Attachment 2, Question 6 for a detailed description of the structures that will be replaced.

11. PECO estimates the project costs to be \$2.5 million. \$700,000 of that total is attributable to materials (new monopoles, foundation, and appurtenances). The remaining \$1.8 million is attributable to direct labor – primarily design and engineering, civil and site work, and electrical construction – and allocated PECO overhead and management costs. PECO will finance, build, and own the proposed line upgrade.

12. Upon Commission approval, the Project has a scheduled construction start date of April 25, 2022.

### **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 exceed 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. With respect to vertical clearances, PECO designs its facilities to meet the NESC rules, plus three additional feet

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in a longer span with clearance issues due to the topography. In order to mitigate these challenges, the Structure was raised 50’.

of vertical clearance. Similarly, PECO adds two additional feet of horizontal clearance beyond the NESC horizontal clearance rules.

#### **IV. DESCRIPTION OF THE PROJECT AREA**

16. The 130-54 line is 0.66 miles long and located in an existing PECO right of way between PECO's Newlinville Substation located in East Fallowfield Township and Cliffs Steel Substation located in Coatesville, PA. The right of way width is 198.5 feet.

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

18. The closest airport to the Project area is the Chester County Airport, which is located approximately 1.5 miles west of the 130-54 line. 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 Project will not affect any state lands, national parks, state parks, local parks, recreational areas, or natural landmarks.

21. The Project will cross one stream. A PNDI was completed and identified a potential for bog turtle habitat. A Phase I bog turtle survey was conducted and determined the area to be clear of bog turtles. Further, the project work will not disturb this area.

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

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

**V. NOTICE**

24. 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**

25. 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).

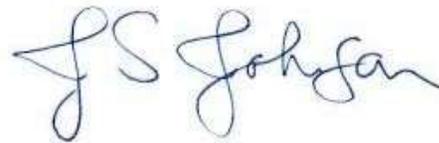
26. The proposed Project qualifies for use of a Letter of Notification because the new High Voltage transmission structure impacts less than two miles of the circuit.

27. 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 replace five transmission structures that are at end of life in East Fallowfield Township and Coatesville, Chester County, Pennsylvania as explained above and in the Attachments hereto.

Respectfully submitted,

A handwritten signature in blue ink that reads "JS Johnson". The initials "JS" are written in a large, stylized cursive font, followed by the name "Johnson" in a smaller, more legible cursive script.

---

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: January 13, 2022

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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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 facts 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: Jan. 13, 2022

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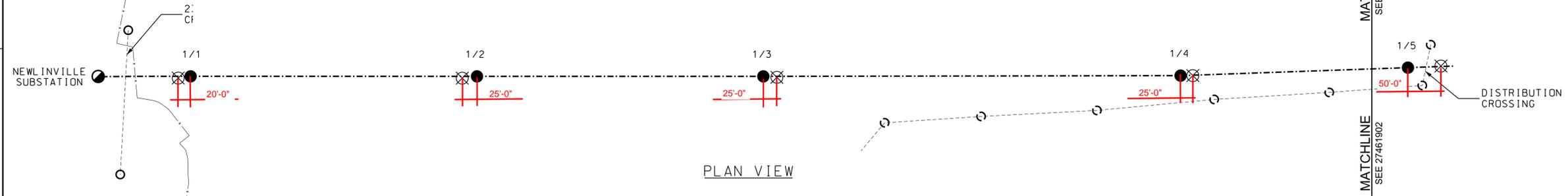
Brian D. Crowe  
Vice President of Transmission  
and Substation

C-274619

ROUTE ATLINECE

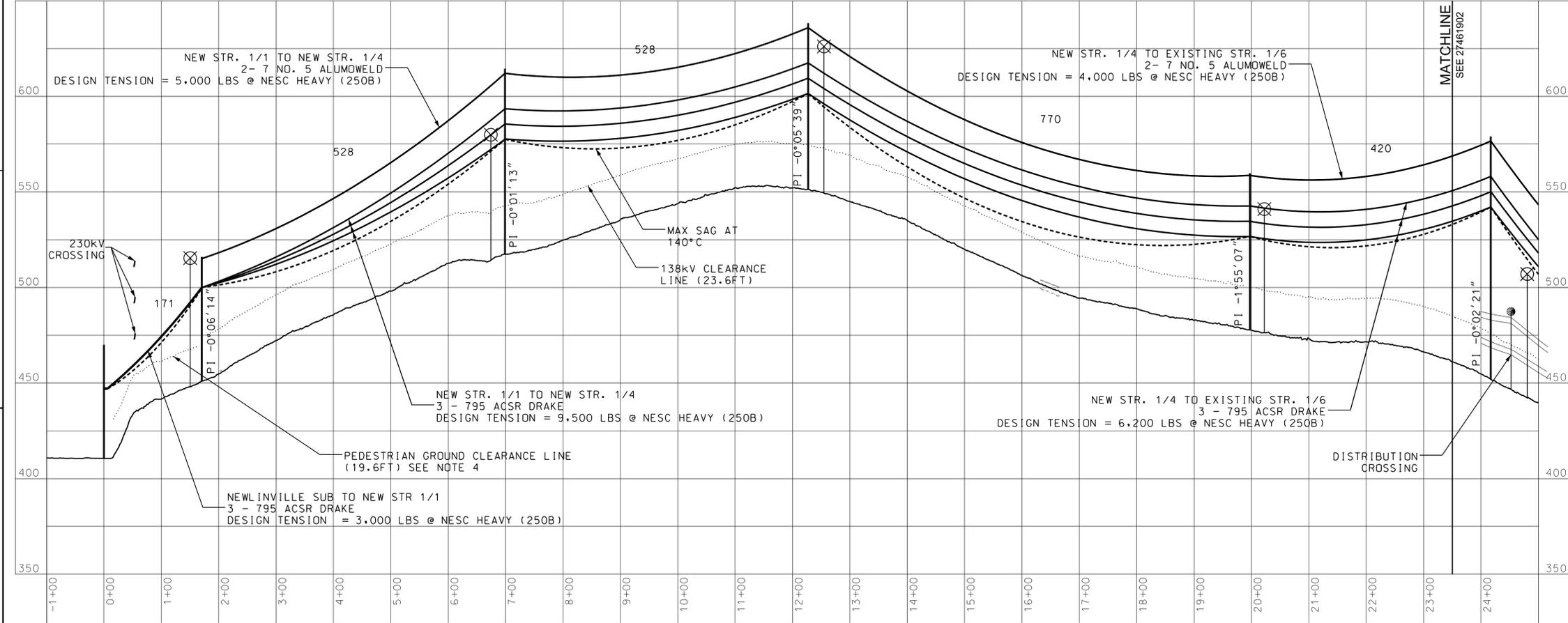
# Attachment 1 Sheet 1

- PLAN LEGEND:**
- TRANSMISSION CENTERLINE
  - DISTRIBUTION LINE
  - EDGE OF PAVEMENT
  - FENCE
  - PROPOSED STRUCTURE
  - ⊗ EXISTING STRUCTURE TO BE REMOVED
  - ⊙ EXISTING STRUCTURE TO REMAIN
  - DISTRIBUTION POLE
  - 230KV STRUCTURE
  - ⊕ TOP OF BUILDING

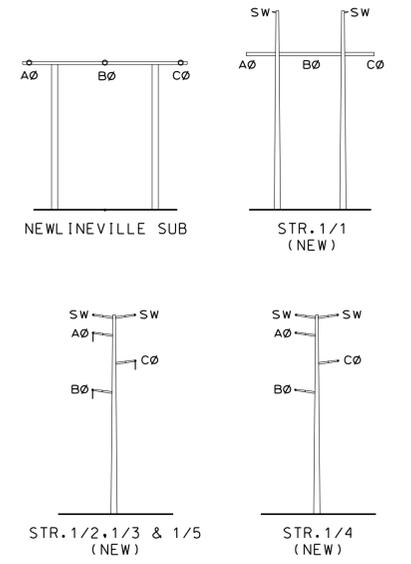


PLAN VIEW

<p>NEWLINVILLE EXISTING SUBDE 130-54 STA=0+00.00 HT=59.34 ELE=410.68 INS. ASSY: (3) S-7310-G4</p>	<p>1/1 SC-138-HDE 130-54 STA=1+70.54 HT=65.00 ELE=451.04 NORTH LEG REVEAL=2.00 SOUTH LEG REVEAL=2.35 INS. ASSY: (6) S-7310-G4 SW. ASSY: (2) S-7350-G1 JUMPER INS. ASSY: (3) S-7110-G4</p>	<p>1/2 SC-138-TAN 130-54 STA=6+98.98 HT=97.00 ELE=517.44 REVEAL=2.00 INS. ASSY: (3) S-7110-G4 SW. ASSY: (2) S-7211-G2</p>	<p>1/3 SC-138-TAN 130-54 STA=12+27.36 HT=87.00 ELE=551.34 REVEAL=2.00 INS. ASSY: (3) S-7110-G4 SW. ASSY: (2) S-7211-G2</p>	<p>1/4 SC-138-DE 130-54 STA=19+97.31 HT=82.00 ELE=477.83 REVEAL=2.00 INS. ASSY: (6) S-7310-G4 SW. ASSY: (2) S-7352-G1 JUMPER INS. ASSY: (3) S-7110-G4</p>	<p>1/5 SC-138-TAN 130-54 STA=24+17.04 HT=127.00 ELE=452.01 REVEAL=2.00 INS. ASSY: (3) S-7110-G4 SW. ASSY: (2) S-7211-G2</p>
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PROFILE VIEW



PHASING DIAGRAM  
LOOKING TOWARD LUKENS STEEL SUB

- PROFILE LEGEND:**
- DISTRIBUTION POLE
  - ⊗ EXISTING STRUCTURE TO BE REMOVED

- NOTES:**
- SAG SHOWN AT 60°F FINAL UNLESS OTHERWISE NOTED
  - 23.6 FT CLEARANCE LINE DISPLAYED FOR CONDUCTOR (138KV) BETWEEN STR. 1/1 AND LUKENS STEEL SUBSTATION
  - PHASING IS ASSUMED BASED ON LIDAR SURVEY. PECO TO PROVIDE EXISTING PHASING INFORMATION
  - 19.6 FT PEDESTRIAN CLEARANCE LINE DISPLAYED FOR CONDUCTOR 138KV BETWEEN NEWLINVILLE SUBSTATION AND STR. 1/1

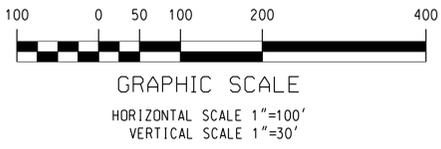
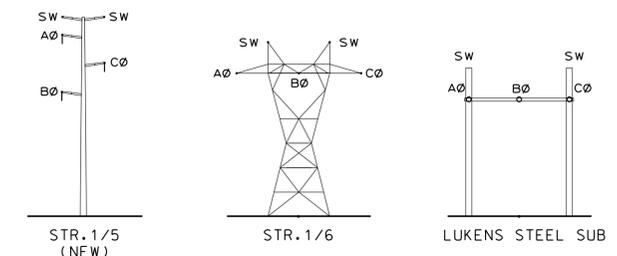
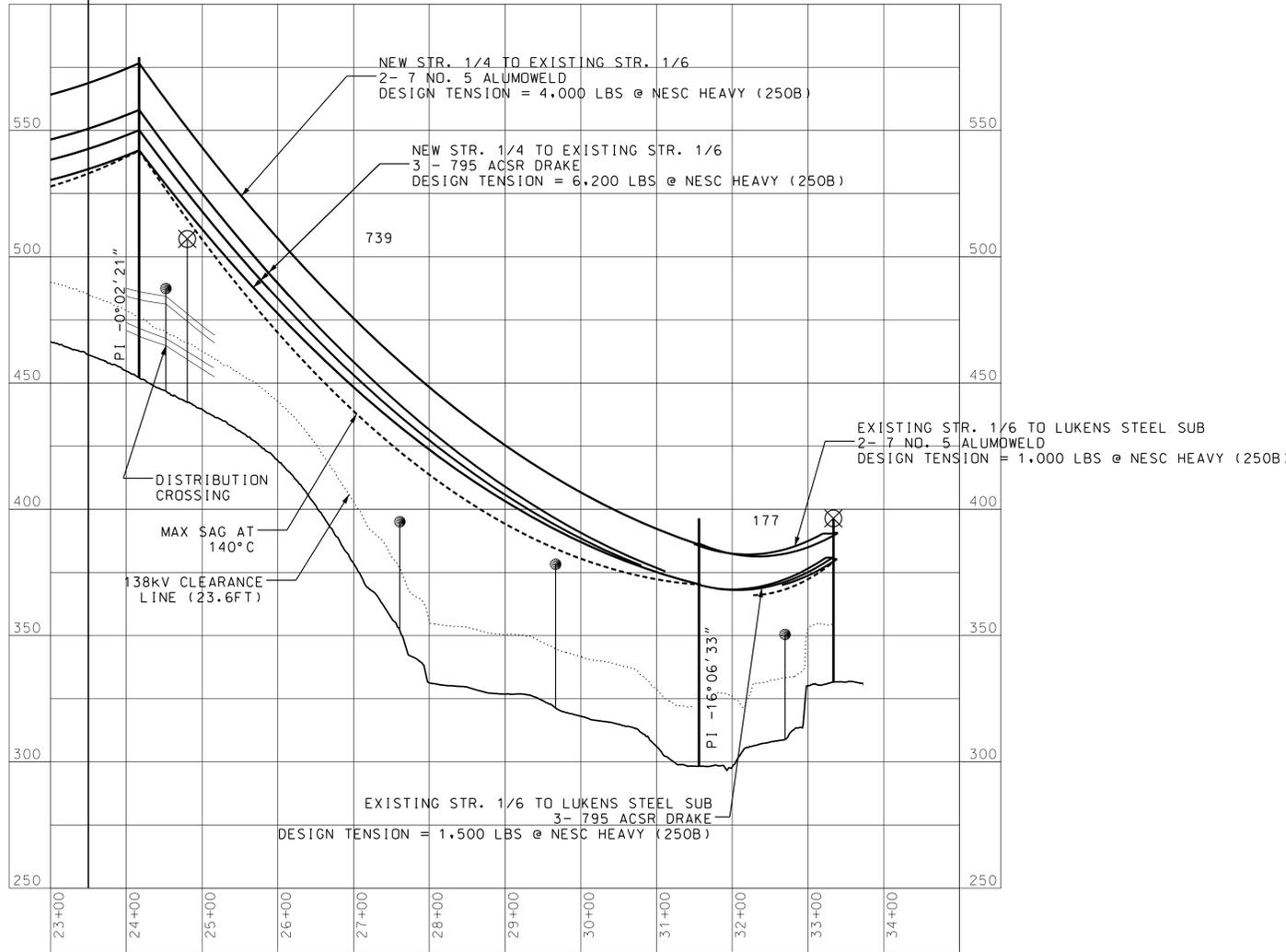
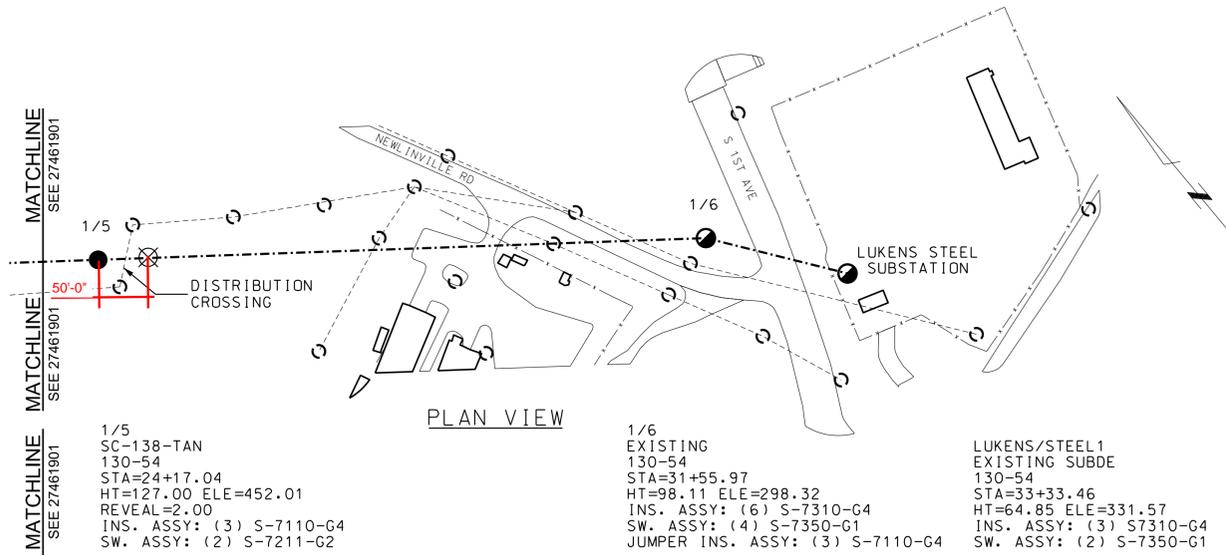


TABLE OF ADDITIONS & CHANGES USE ONLY PRINTS SHOWING LATEST DATE			
NO.	DATE	DESCRIPTION	REV'D CHK'D APP'D
A110	EC-254548		D
29	WO-17069093		M
21	POWER ENGINEERS, INC.	ADDED: THIS DRAWING ISSUED FOR BID	Y

TRANSMISSION LINE INDEX C-274618					
PLAN AND PROFILE 130-54 LINE 138KV TRANSMISSION LINE					
NEWLINVILLE TO LUKENS STEEL PECO Energy Company					
SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED DATE
NONE	PET	PET	PET		10-29-21
APPROVED				APPROVED	
APPROVED				APPROVED	
APPROVED				APPROVED	
SHEET 1 OF 2			C-274619-A1		

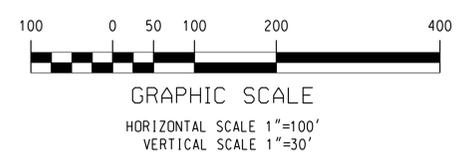
# Attachment 1 Sheet 2

- PLAN LEGEND:**
- TRANSMISSION CENTERLINE
  - DISTRIBUTION LINE
  - EDGE OF PAVEMENT
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  - PROPOSED STRUCTURE
  - ⊗ EXISTING STRUCTURE TO BE REMOVED
  - EXISTING STRUCTURE TO REMAIN
  - DISTRIBUTION POLE
  - 230KV STRUCTURE
  - TOP OF BUILDING



PHASING DIAGRAM  
LOOKING TOWARD LUKENS STEEL SUB

- PROFILE LEGEND:**
- DISTRIBUTION POLE
  - ⊗ EXISTING STRUCTURE TO BE REMOVED



- NOTES:**
- SAG SHOWN AT 60°F FINAL UNLESS OTHERWISE NOTED
  - 23.6 FT CLEARANCE LINE DISPLAYED FOR CONDUCTOR (138KV)
  - PHASING IS ASSUMED BASED ON LIDAR SURVEY. PECO TO PROVIDE EXISTING PHASING INFORMATION

TABLE OF ADDITIONS & CHANGES		USE ONLY PRINTS SHOWING LATEST DATE	
NO.	DATE	DESCRIPTION	
A110	EC-254548		
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	ADDED: THIS DRAWING		
	ISSUED FOR BID		

TRANSMISSION LINE INDEX C-274618						
PLAN AND PROFILE 130-54 LINE 138KV TRANSMISSION LINE						
NEWLINVILLE TO LUKENS STEEL PECO Energy Company						
SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	PET	PET	PET			10-29-21
APPROVED					APPROVED	
APPROVED					APPROVED	
APPROVED					APPROVED	
SHEET 2 OF 2		C-274619-A1		PLOT SCALE		
				FILE SCALE		

**Letter of Notification Filing Checklist**  
**PECO 220-22 LON Application**  
**Letter of Notification Filing Checklist**

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  
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Philadelphia, PA 19103  
215-841-4353  
[jennedy.johnson@exeloncorp.com](mailto: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.**

PECO's existing 130-54 line longitudinally traverses 0.66 miles along an existing PECO right of way between PECO's Newlinville Substation located in East Fallowfield Township and Cliffs Steel Substation located in Coatesville, PA. The right of way width is 198.5 ft.

As described in response to Question 4 (below), the purpose of this project is to replace five (5) wood pole structures that are at end of life with four (4) new steel, single circuit monopole structures and one (1) new steel, single circuit H-frame structure.

The proposed project is located within East Fallowfield Township and Coatesville, Chester 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 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 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. The route of this project work is approximately 0.66 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 130-54 line is operated at 138 kV and consists of six structures. Structure 1-6 is a steel lattice tower and in good condition and will not be replaced. The remaining five structures are wood poles that are at end of life and need to be replaced. The 130-54 line is one of two lines that feed the Cliffs Steel Substation located in Coatesville. The plant has indicated that this line is required for the foreseeable future.

**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 subsection b, below.

- 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'

The existing line rating will be maintained, and a similar sized new conductor will be installed.

- 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 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. For new construction PECO provides a 3’ vertical buffer and a 2’ horizontal buffer beyond all NESC clearance requirements.

- 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 structures will be installed, as described in the table below. The existing structures will be removed after the new structures have been erected.

<b>Structure Number</b>	<b>Existing Structure Height (ft)</b>	<b>New Structure Height (ft)</b>	<b>Structure Relocation Location (offset from existing)</b>
1-1	75’	63’	20’ south
1-2	75’	95’	25’ south
1-3	85’	85’	25’ north
1-4	75’	80’	25’ north
1-5	75’	125’	50’ north
1-6	70’	N/A	Existing structure (will not be replaced)

See also PECO Attachment 1, which consists of the proposed plan and profile of the project and shows the location of the proposed tower in relationship to existing structures. PECO Attachment 1 is also being provided to Commission Staff in electronic format for convenience as it can be enlarged to focus on specific areas of the project plan.

- 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 additional easement is required for this project. The new structures will be placed within the existing easement near the existing structures.

- 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 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 \$2.5 million. \$700,000 of that total is attributable to materials (new monopoles, foundation, and appurtenances). The remaining \$1.8 million is attributable to direct labor – primarily design and engineering, civil and site work, and electrical construction – and allocated PECO overhead and management costs. PECO will finance, build, and own the proposed line upgrade.

- 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 taking a transmission outage. The outage for the structure erection and wire transfer work is currently scheduled for 4/25/2022 to 5/27/2022. The proposed in-service date of this project is 5/27/2022.

- 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 replacing five existing structures and reconductoring the line as described in the response to Question 6. The structures will be located with the existing right-of-way along the existing center line near the existing structures. No other changes are proposed. See PECO Attachment 1.

The approximate ROW for the proposed project is 198.5 ft wide.

- 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, January 13, 2022. 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 HV line 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.**

One stream/storm drainage area was identified. A PNDI was completed and identified a potential for bog turtle habitat. A Phase I bog turtle survey was conducted and determined the area to be clear of bog turtles. Further, the project work will not disturb this area.

- 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.**

Only one 138 kV circuit is proposed for this line.

- 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).**

The existing 130-54 line is 54 years old. The anticipated service life of the line was 50 years. Five wood pole structures have significant rot and are structurally at end of life. The need for this project is related condition and age of the existing wood structures.

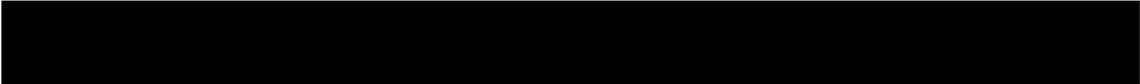
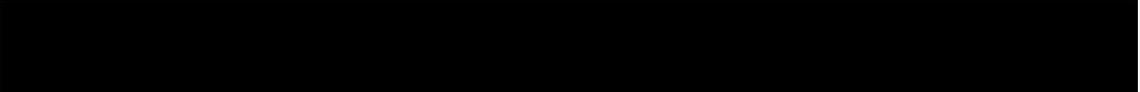
PECO's maintenance procedures require a comprehensive inspection on all transmission structures on a 5-year periodicity. The last inspection on the 130-54 line was performed in 2018. The line and structures were found to be in poor condition. A 2021 walkdown for the project identified both cross arms on structure 1-5 had failed. The cross arms were reinforced with braces and the line was returned to service. The repair was a temporary fix until the structure replacement project was completed.

The service life of the new transmission monopoles and appurtenances is expected to be 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 have been three unplanned outages on this line in the prior 10 years, none 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. The date, cause, and duration of the outages were as follows:

**\*\*\*\*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 130-54-line feeds the Cliffs Steel Substation. Cliffs Steel is not a critical customer.

**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.**

The existing 130-54 wood poles are at end of life with reliability trending downwards due to wood rot. Reliability on the 130-54 is expected to increase due to new robust steel structures, conductors, and hardware.

**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.

**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.**

*See* PECO Answer to Question 21, above.