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February 28, 2022

Via E-Filing

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

RE: PECO Energy Company's Electric Asset Optimization Plan Docket No. P-2015-2471423 and PECO Energy Company's Second Long-Term Infrastructure Improvement Plan for its Electric Operations Docket No. P-2020-3020974

Dear Ms. Chiavetta:

Enclosed for filing in the above referenced matter is PECO Energy Company's Electric Annual Asset Optimization Plan.

Due to the ongoing COVID-19 pandemic, PECO's office personnel are working remotely. Accordingly, PECO will not have its usual access to photocopying and U.S. mail, among other services. PECO requests that all communications with PECO be transmitted by email.

If you have any questions regarding this filing, please do not hesitate to contact me at 215-841-5777.

Sincerely,

cc: Parties of Record

PECO ENERGY COMPANY

ANNUAL ASSET OPTIMIZATION PLAN FOR 2021 - ELECTRIC OPERATIONS

Docket No. P-2020-3020974

PECO ENERGY COMPANY
ANNUAL ASSET OPTIMIZATION PLAN FOR 2021 - ELECTRIC
Docket No. P-2020-3020974

I. INTRODUCTION

On February 14, 2012, Governor Corbett signed into law Act 11 of 2012 (“Act 11”), which amended the Pennsylvania Public Utility Code in several respects, including the addition of Subchapter B (66 Pa. C.S. §§ 1350-1360). Act 11 authorized the Pennsylvania Public Utility Commission (“PUC” or “Commission”) to approve a distribution system improvement charge (“DSIC”) upon petition by an electric distribution company, a natural gas distribution company, a water utility, or a wastewater utility. A DSIC authorizes a utility to recover the reasonable and prudent costs incurred to repair, improve, or replace eligible property that is part of the utility’s distribution system. The DSIC allows utilities to recover the costs of DSIC-eligible property that is placed in service between base rate cases and, therefore, is not included in the existing revenue requirement being recovered in the utility’s base rates.

In addition, Subchapter B sets forth various requirements that must be satisfied by a qualifying utility in order to establish a DSIC and to recover the reasonable and prudent costs to repair, improve or replace eligible property.

On August 2, 2012, the Commission entered its *Final Implementation Order in Implementation of Act 11 of 2012* at Docket No. M-2012-2293611 (“Implementation Order”). The Implementation Order sets forth the Commission's expectations with regard to: 1) a Long Term Infrastructure Improvement Plan (“LTIIIP”), which must be filed as a precursor to a request to establish a DSIC (66 Pa.C.S. § 1352); and 2) Annual Asset Optimization Plans (“AAO Plans”

or “AAOP”), which must be filed each year by a utility that has an approved DSIC and LTIIIP (66 Pa.C.S. § 1356).

According to the Implementation Order, AAO Plans are intended to provide an overall status report regarding a utility's progress in making infrastructure improvements pursuant to a Commission-approved LTIIIP (Implementation Order at 30). AAO Plans are expected to: 1) demonstrate LTIIIP compliance and progress; and 2) identify a utility's near-term construction projects that will be funded by the DSIC, consistent with the LTIIIP.

On May 22, 2014, 52 Pa. Code Section 121.6 was adopted, which requires AAO Plan elements to include: (1) a description of all eligible property repaired, improved and replaced in the immediately preceding 12-month period pursuant to the utility's LTIIIP; and (2) a detailed description of all the facilities to be improved in the upcoming 12 months.

II. PECO’s Electric LTIIIP

A. LTIIIP I (2016-2020)

On March 27, 2015, PECO filed for *Approval of its Electric Long Term Infrastructure Improvement Plan and to Establish a Distribution System Improvement Charge for its Electric Operations* at Docket No. P-2015-2471423. PECO’s LTIIIP was a five-year plan spanning the years 2016-2020. It was designed to accelerate infrastructure improvements in order to enhance system resiliency and reliability. The plan consisted of three main project areas and a fourth category related to unreimbursed facility relocations: 1) Storm Hardening and Resiliency Measures; 2) Underground Cable Replacements; 3) Building Substation Retirements; and 4) Facility Relocations. During the 5-year LTIIIP period, PECO’s increased expenditures were anticipated to amount to \$324.3 million, with \$274.3 million for the above reliability projects and \$50 million for facility relocation work as permitted by 66 Pa. C.S. Section 1351 (definition

of “eligible property”). On October 22, 2015, the PUC approved PECO’s electric LTIIIP and DSIC petition.¹ PECO’s LTIIIP I plan ended on December 31, 2020.

B. LTIIIP II (2021-2025)

On July 22, 2020, PECO filed for *Approval of its [Second] Electric Long Term Infrastructure Improvement Plan* at Docket No. P-2020-3020974 (“LTIIIP II”). PECO’s LTIIIP II is a five-year plan spanning the years 2021-2025. It is designed to accelerate infrastructure improvements in order to enhance system resiliency and reliability. The plan consists of three main project areas and a fourth category related to unreimbursed facility relocations: 1) Storm Hardening and Resiliency; 2) Underground Cable Replacements; 3) Substation Switchgear Replacement; and 4) Facility Relocations. During the five-year LTIIIP II period, PECO’s increased expenditures are estimated to be \$1.44 billion, with \$1.36 billion for the above reliability projects and \$75 million for facility relocation work. On November 19, 2020, the PUC approved PECO’s electric LTIIIP II Plan.

PECO hereby provides its AAO Plan for 2021 and is filing copies of this AAO Plan with the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and other interested parties in Docket No. P-2020-3020974.

¹ The DSIC was approved subject to two issues referred to the Office of Administrative Law Judge for hearing: 1) whether the DSIC should apply to transmission voltage rates; and 2) what revenues associated with PECO’s tariff riders should be recovered through the DSIC. (See the Commission’s Opinion and Order, issued October 22, 2015, in Docket No. P-2015-2471423). On September 21, 2017, the Commission approved the Joint Petition for Settlement, which resolved the issues described above.

III. REQUIRED ELEMENTS OF THE AAO PLAN

A. Description of all Eligible Property Repaired, Improved, and Replaced in the Immediately Preceding 12-Month Period Pursuant to PECO's LTIIIP II

Exhibit A² attached hereto provides summary data with respect to projects that were completed in LTIIIP year 2021 for: 1) Storm Hardening and Resiliency Programs, 2) Underground Cable Replacement Programs, 3) Switchgear Replacement Program, and 4) Facility Relocations (as specified below). In 2021, PECO spent approximately \$187.8 million on the LTIIIP program areas described below compared to \$183.7 million estimated in the LTIIIP for 2021 (excluding Facility Relocations), which included execution of all 2021 projects, as well as substantial efforts to begin engineering and construction on planned 2022 electric LTIIIP II projects – primarily for Underground Residential Development (“URD”) Cable Replacement and Unit Substation Retirements. PECO met or exceeded its 2021 scope commitments for all planned LTIIIP work categories (i.e., Customers Experiencing Multiple Interruptions (“CEMI”) Areas, CEMI Targeted Circuits, Aerial Infrastructure Resiliency (“AIR”) Areas, AIR Targeted Assets, Circuit Rebuilds Enabling Unit Substation Retirements, Main Stem cable replacements, and URD cable replacements). Additionally, since the end of 2020 and LTIIIP I, PECO hired an additional 46 equivalent full-time employees internally. As a result of the 2021 programs, an additional 140 equivalent full-time contracting resources gained employment due to LTIIIP II Programs.

1. Storm Hardening and Resiliency Programs

a. Customers Experiencing Multiple Interruptions (“CEMI”) Programs

i. CEMI Areas

² Exhibit A also details estimated LTIIIP II spend in 2021.

As shown in Exhibit A, PECO met its 2021 LTIIIP II goals for CEMI Areas. The LTIIIP estimated that PECO would complete between eight and thirteen CEMI Areas projects and actual results were twelve. The CEMI Areas projects were completed in the following locations:

County	Number of Projects
Bucks	3
Chester	2
Delaware	7

The projects reduced the impact of storm conditions in these counties and involved: 1) replacing open wire and self-supporting cable installations with three-phase and single-phase spacer cable installations; 2) conversion and retirement of obsolete equipment; and 3) extending 34kV and 13kV facilities to create sectionalizing loops. In addition, PECO began preliminary CEMI Areas work planned for 2022 (i.e., detailed project design, vegetation management and preliminary construction) in Chester, Delaware, Montgomery, and York Counties. In 2021, PECO spent \$12.0 million on these CEMI Areas projects compared to the \$13.5 million estimated in the LTIIIP.

ii. CEMI Targeted Circuits

As shown in Exhibit A, PECO exceeded its 2021 LTIIIP II goals for CEMI Targeted Circuits. The LTIIIP estimated that PECO would complete between three and four CEMI Targeted Circuits projects and actual results were five. The CEMI Targeted Circuits projects were completed in the following locations:

County	Number of Projects
Delaware	2
Chester	2
Montgomery	1

The projects reduced the impact of storm conditions in these counties and involved: 1) replacing open wire and self-supporting cable installations with three-phase and single-phase spacer cable installations; 2) installing tree-resistant wire in heavily vegetated areas; and 3) installing express main cable. Additionally, PECO began preliminary CEMI Targeted Circuits work planned for 2022 (i.e., detailed project design, vegetation management and preliminary construction) in Chester, Delaware, and Bucks Counties. In 2021, PECO spent \$5.4 million on these CEMI Targeted Circuits projects compared to the \$6.5 million estimated in the LTIP.

b. Aerial Infrastructure Resiliency (“AIR”) Programs

i. AIR Areas

As shown in Exhibit A, PECO met its 2021 LTIP II goals for AIR Areas. The LTIP estimated that PECO would complete between two and five AIR Areas projects and actual results were three. The AIR Areas projects were completed in the following locations:

County	Number of Projects
Montgomery	1
Philadelphia	2

The projects reduced the impact of storm conditions in these counties and involved crossarms, poles, insulators, connectors, and cutouts.³ The replaced aging infrastructure is designed to withstand wind and ice loading consistent with the Grade B construction guidelines defined by the National Electric Safety Code. Additionally, PECO began preliminary AIR Areas work planned for 2022 (i.e., detailed project design, vegetation management and preliminary construction) in Philadelphia and Montgomery Counties. In 2021, PECO spent \$6.0 million on these AIR Areas projects compared to the \$4.9 million estimated in the LTIP.

³ A cutout is a combination of a fuse and switch used to protect overhead primary power feeder lines and taps from surges and overloads.

ii. AIR Targeted Assets

As shown in Exhibit A, PECO exceeded its 2021 LTIIIP II goals for AIR Targeted Assets. The LTIIIP estimated that PECO would replace between 2,500 and 3,500 assets and actual results were 16,690 assets.⁴ The AIR Targeted Assets replacements were completed in the following locations:

County	Number of Assets Replaced
Bucks	2,516
Chester	3,557
Delaware	1,061
Montgomery	9,328
Philadelphia	96
York	132

The projects reduced the impact of storm conditions in these counties and involved replacing poles, overhead conductors, cross-arms, insulators, connectors, switches, and cutouts. Additionally, PECO began preliminary AIR Targeted Assets work planned for 2022 (i.e., detailed project design, vegetation management and preliminary construction) in Bucks, Chester, Delaware, Montgomery, Philadelphia, and York Counties. In 2021, PECO spent \$30.2 million on these AIR Targeted Assets replacements compared to the \$30.3 million estimated in the LTIIIP.

iii. Building Substation Retirement

As part of the electric LTIIIP, PECO has committed to accelerating the retirement of obsolete building substations and all associated equipment operating at 4kV. In 2021, detailed design was finalized and construction design began on the retirement of the Upper Darby 4kV

⁴ The annual asset ranges initially filed with PECO's LTIIIP II Plan were based on the number of poles. Based on the types of aerial infrastructure replaced in 2021, the Company included qualifying aerial infrastructure as part of the asset count and will continue this practice in future AAOPs.

Substation in Delaware County. This multi-year project will run through 2023 and convert all 4kV infrastructure served out of Upper Darby Substation to 13kV supported by a combination of new and existing circuits. Overall reliability will be improved by creating new 13kV circuit breakdowns, installing new reclosers, and retiring obsolete equipment. In 2021, PECO spent \$14.4 million on Building Substation Retirements compared to the \$21.0 million estimated in the LTIIIP.

iv. Circuit Rebuild Enabling Unit Substation Retirements

As shown in Exhibit A, PECO met its LTIIIP II goal for Circuit Rebuild Enabling Unit Substation Retirements. The LTIIIP estimated that PECO would rebuild six to eight circuits supplied by Unit Substations and actual results were eight. PECO retired two 4kV Unit Substations in Philadelphia, four 4kV Unit Substations in Chester County, and two 4kV Unit Substations in Montgomery County. The associated circuits were rebuilt and converted to 13kV or 34 kV. Additionally, PECO began substantial preliminary Circuit Rebuild work for 2022 (i.e., detailed project design, vegetation management, civil construction, and electrical construction) in Delaware, Chester, Bucks, Montgomery, and Philadelphia Counties. In 2021, PECO spent \$29.0 million for all Circuit Rebuild work compared to the \$25.0 million estimated in the LTIIIP.

2. Underground Cable Replacement Programs

a. Main Stem Cable Replacements

As shown in Exhibit A, PECO met its LTIIIP II goal for Main Stem cable replacements for LTIIIP year 2021. The LTIIIP estimated that PECO would replace 28 and 33 miles of Main Stem cable and actual results were 28 miles. Main Stem cable was replaced in the following locations:

County	Miles Replaced
Chester	1.3
Delaware	4.5
Montgomery	8.2
Philadelphia	14.0

Additionally, PECO began preliminary Main Stem work planned for 2022 (i.e., detailed project design, material procurements and preliminary construction) in Delaware, Philadelphia, and Montgomery Counties. For 2021, PECO spent \$37.3 million on its Main Stem cable replacements compared to the \$30.5 million estimated in the LTIP.

b. Underground Residential Development Cable Replacements

As shown in Exhibit A, PECO met its 2021 LTIP II goal for URD cable replacements. The LTIP estimated that PECO would replace 95 to 110 miles of URD cable and actual results were 96 miles. URD cable replacements occurred in the following locations:

County	Miles Replaced
Bucks	41.9
Chester	12.6
Delaware	8.9
Montgomery	19.1
Philadelphia	13.0

PECO also began URD work planned for 2022 (i.e., detailed project design and preliminary construction) in Chester, Delaware, Bucks, Montgomery, and Philadelphia Counties. In 2021, PECO spent \$53.3 million on URD cable replacements compared to the \$51.5 million estimated in the LTIP.

3. Switchgear Replacement Program

PECO estimated that it would spend \$0.5 million for Substation Switchgear Replacement Program to begin engineering for future replacements within the LTIIIP II plan. In 2021, PECO spent \$0.2 million to begin engineering for the replacement of switchgear replacement.

4. Facility Relocation

Facility Relocations involve unreimbursed costs related to highway relocation projects that are eligible for recovery under 66 Pa.C.S. Sections 1351 and 1353. These costs arise when PECO moves its facilities at the direction of the state, a municipality, or another governmental entity to construct a new road or to perform other construction. Because these projects are reactive in nature, PECO's LTIIIP II did not include a projected number of relocations. PECO continued design efforts and the relocation of its facilities in support of PennDOT's improvements along State Route 202 (approximately \$1.1 million) in Montgomery County, State Route 1 (approximately \$0.6 million) in Bucks County, and the I-95 corridor (approximately \$0.6 million) through the Philadelphia area. PECO also continued to assist in the relocation of its facilities in support of Amtrak's project to improve about 18 miles of transmission lines between its Zoo substation and the Paoli substation (approximately \$0.4 million). Approximately \$4.6 million was spent on smaller type PennDOT and Municipal projects.

In 2021, PECO spent \$7.3 million on Facility Relocations compared to the \$15.0 million estimated in the LTIIIP II filing (and the \$17.5 million estimated based on projects scheduled at the time of the filing of the prior year's AAOP).

B. Description of the Facilities to be Improved in the Upcoming 12-Month Period (2022)

PECO expects to meet or exceed its LTIIIP II goals/targets for 2022 (as specified below and in Exhibit A). As filed, PECO estimated a total of approximately \$305.6 million for LTIIIP

II projects in 2022. From an overall financial perspective, PECO now estimates that it will spend approximately \$246.7 million on the following LTIIIP II projects in 2022.

1. Storm Hardening and Resiliency Programs

a. Customers Experiencing Multiple Interruptions (“CEMI”) Programs

i. CEMI Areas

PECO expects that it will meet or exceed its goal to complete between 8 and 13 CEMI Areas projects in 2022, with an LTIIIP II-filed amount of \$13.5 million and at an estimated cost of \$13.2 million. The majority of the 2022 CEMI Areas projects will be in Chester, Delaware, Montgomery, and York Counties. These projects will focus on 4kV to 13kV or 34kV conversions, spacer cable, tree wire installations, and Hendrix installations.

ii. CEMI Targeted Circuits

PECO expects that it will meet or exceed its goal to complete between 3 and 4 CEMI Targeted Circuits projects in 2022, with an LTIIIP II-filed amount of \$6.6 million and at an estimated cost of \$6.7 million. The 2022 CEMI Targeted Circuits projects will be in Chester, Delaware, and Bucks Counties. These projects will focus on spacer cable, main cable installations, and sectionalizing existing circuits.

b. Aerial Infrastructure Resiliency (“AIR”) Programs

i. AIR Areas

PECO expects that it will meet or exceed its goal to complete between 2 and 5 AIR Areas projects in 2022, with an LTIIIP II-filed amount of \$5.0 million and an estimated cost of \$5.0 million. The 2022 AIR Areas projects will be in Philadelphia and Montgomery Counties. These projects will focus on the replacement of aerial infrastructure, including poles, overhead

conductors, cross-arms, insulators, connectors, and cutouts in areas served by one or more circuits.

ii. AIR Targeted Assets

PECO expects that it will meet or exceed its goal to complete between 6,500 and 7,500⁵ AIR Targeted Assets replacements in 2022, with an LTIIIP II-filed amount of \$70.0 million and at an estimated cost of \$25.3 million. The 2022 AIR Targeted Assets are focused across the entire PECO service territory. The asset replacements focus on aerial infrastructure, including poles, overhead conductors, cross-arms, insulators, connectors, switches, and cutouts. As PECO has updated its AIR Targeted Assets program to account for equipment beyond poles, it anticipates meeting or exceeding its unit goal at the lower estimated budget.

iii. Building Substation Retirement

PECO will continue to develop engineering plans for, and begin construction on, the multi-year Upper Darby Building Substation and Overbrook Building Substation projects in 2022, with an LTIIIP II-filed amount of \$22.0 million and at an estimated cost of approximately \$21.0 million. This work will include finalizing conceptual and detailed engineering designs, environmental review and testing, long-lead material procurements, vegetation management, and underground civil construction. Additionally, this work will include underground and overhead electrical construction in 2022.

iv. Circuit Rebuild Enabling Unit Substation Retirements

PECO expects that it will meet its goal to retire between 7 and 10 Unit Substations and rebuild the associated circuits (i.e., obsolete 4 kV circuits) in 2022, with an LTIIIP II-filed

⁵ See footnote 4, *infra*.

amount of \$44.0 million and at an estimated cost of \$36.1 million. These projects will be in Delaware, Chester, Bucks, Montgomery, and Philadelphia Counties.

2. Underground Cable Replacement

a. Main Stem Cable Replacements

PECO expects that it will meet or exceed its goal to replace between 38 and 48 miles of Main Stem cable in 2022, with an LTIP II-filed amount of \$43.0 million and at an estimated cost of \$38.9 million. PECO will rebuild Main Stem primary and secondary infrastructure in Delaware, Philadelphia, and Montgomery Counties.

b. Underground Residential Development (“URD”) Cable Replacements

PECO expects that it will meet or exceed its goal to replace between 150 and 170 miles of URD cable in 2022, with an LTIP II-filed amount of \$80.0 million and at an estimated cost of \$80.9 million. PECO will upgrade URD systems in Chester, Delaware, Bucks, Montgomery, and Philadelphia Counties. As outlined in PECO’s LTIP II filing, the Company identified potential disruptions of business operations of manufacturers of distribution equipment, which could compromise the manufacturing and delivery supply chain for materials needed to complete PECO’s capital improvement projects. As a result of the ongoing COVID-19 pandemic, padmount transformers and URD cable have experienced a significant increase in lead time. The Company continues to leverage existing relationships and monitors the ongoing supply chain issues.

3. Switchgear Replacement Program

PECO’s LTIP II-filed amount was \$6.5 million, and the Company estimates that it will spend \$6.5 million for Substation Switchgear Replacement Program to continue engineering and start construction for future replacements within the LTIP II plan.

4. Facility Relocation

For 2022, PECO's LTIP II-filed amount was \$15 million, and the Company estimates that it will spend \$13.1 million on Facility Relocations based on currently scheduled projects. PECO notes that while it estimated spending \$15 million on Facility Relocations in 2022 in its LTIP II plan, that estimation is now lower based on currently scheduled projects.

EXHIBIT A

LTIP II

<i>Million \$</i>	<i>2021 LTIP</i>	<i>2021 Actual</i>	<i>2022 LTIP</i>	<i>2022 Forecast</i>
Customers Experiencing Multiple Interruptions (CEMI) Areas	\$13.5	\$12.0	\$13.5	\$13.2
Customers Experiencing Multiple Interruptions (CEMI) Targeted Circuits	\$6.5	\$5.4	\$6.6	\$6.7
Aerial Infrastructure Resiliency Areas	\$4.9	\$6.0	\$5.0	\$5.0
Aerial Infrastructure Resiliency Targeted Assets	\$30.3	\$30.2	\$70.0	\$25.3
Building Substation Retirement	\$21.0	\$14.4	\$22.0	\$21.0
Circuit Rebuild for Unit Substation Retirements	\$25.0	\$29.0	\$44.0	\$36.1
Main Stem Cable	\$30.5	\$37.3	\$43.0	\$38.9
URD Cable	\$51.5	\$53.3	\$80.0	\$80.9
Switchgear Replacement Program	\$0.5	\$0.2	\$6.5	\$6.5
Facility Relocation*	\$15.0	\$7.3	\$15.0	\$13.1
Total	\$198.7	\$195.1	\$305.6	\$246.7

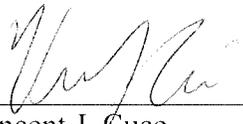
* LTIP plan included \$15.0M; however, PECO estimated that it would spend \$17.5 million on Facility Relocations based on projects scheduled at the time of the prior year AAOP filing. PECO estimates that it will spend \$13.1 million on Facility Relocations based on currently scheduled projects

<i>Units</i>	<i>2021 LTIP</i>	<i>2021 Actual</i>	<i>2022 LTIP</i>	<i>2022 Forecast</i>
Customers Experiencing Multiple Interruptions (CEMI) Areas (Projects)	8-13	12	8-13	8-13
Customers Experiencing Multiple Interruptions (CEMI) Targeted Circuits (Projects)	3-4	5	3-4	3-4
Aerial Infrastructure Resiliency Areas (Projects)	2-5	3	2-5	2-5
Aerial Infrastructure Resiliency Targeted Assets (Assets)	2,500-3,500	16,690	6,500-7,500	13,500-14,500
Building Substation Retirement	0	0	0	0
Circuit Rebuild for Unit Substation Retirements (Units)	6-8	8	7-10	7-10
Main Stem Cable (Miles)	28-33	28	38-48	38-48
URD Cable (Miles)	95-110	96	150-170	150-170
Switchgear Replacement Program	0	0	0	0
Facility Relocation	0	0	0	0

VERIFICATION

I, Vincent J. Cuce, hereby declare that I am Director of Engineering for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. § 4904 pertaining to false statements to authorities.

Date: February 28, 2022



Vincent J. Cuce
Director of Engineering

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF :
ITS ELECTRIC LONG TERM : Docket No. P-2020-3020974
INFRASTRUCTURE :
IMPROVEMENT PLAN :

CERTIFICATE OF SERVICE

I certify and affirm that I have this day served a copy of the *2021 Annual Asset Optimization Plan relating to PECO Energy Company's Electric Long Term Infrastructure Improvement Plan*, in the above-referenced docket, on the following persons in the matter specified with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

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Dated: February 28, 2022

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