



Jennedy S. Johnson
Assistant General Counsel

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

August 4, 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 Remove and Replace Seventeen Wood Structures in Havertown, Haverford Township, Delaware 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 Remove and Replace Seventeen Wood Structures in Havertown, Haverford Township, Delaware 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). Please note that due to necessary transmission outages, PECO is seeking expedited consideration of this filing – by the Commission’s October 6, 2022 Public Meeting.

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.

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
Jordan Van Order, 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 REMOVE AND :
REPLACE SEVENTEEN : **Docket No. A-2022-_____**
STRUCTURES IN HAVERFORD :
HAVERFORD TOWNSHIP, :
DELWARE 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 rkanaskie@pa.gov</p>	<p>Teresa Reed Wagner, Executive Director* Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101 tereswagne@pa.gov</p>
<p>Patrick M. Cicero, Acting Consumer Advocate * Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 pcicero@paoca.org</p>	<p>Haverford Township Building & Codes Department Haverford Township Building 1014 Darby Road Havertown, PA 19083 codes@havtwp.org</p>
<p>Haverford Township Planning and Zoning Department Haverford Township Building 1014 Darby Road Havertown, PA 19083 mbuchanan@haverfordtownship.org</p>	<p>David R. Burman, Township Manager Haverford Township Manager Haverford Township Building 1014 Darby Road Havertown, PA 19083 dburman@havtwp.org</p>

<p>Larry Holmes, Esquire, President & 6th Ward Commissioner Haverford Township Board of Commissioners Haverford Township Building 1014 Darby Road Havertown, PA 19083 lholfmes@havgtp.org</p>	<p>Monica Taylor, Chair Delaware County Council Government Center 201 W. Front Street Media, PA 19063 taylor@m@co.delaware.pa.us</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>
<p>Yassmin Gramian, Secretary Department of Transportation Keystone Building 400 North Street, 5th Floor Harrisburg, PA 17120</p>	

* Served electronically only



Dated: Aug. 4, 2022

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LETTER OF NOTIFICATION OF :
PECO ENERGY COMPANY, FILED :
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STRUCTURES IN HAVERTOWN :
HAVERFORD TOWNSHIP, :
DELAWARE COUNTY :
PENNSYLVANIA :**

LETTER OF NOTIFICATION

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 remove and replace seventeen (17) structures that are at the end of life in Havertown, Haverford Township, Delaware County (the “Project”). Due to the scheduled transmission outage needed to complete construction, PECO is requesting expedited treatment of this filing – by the October 6, 2022 Public Meeting. 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

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 removal of seventeen (17) wood structures that are at end of life – sixteen (16) of which will be replaced with new steel monopoles supported on drilled pier foundations along the existing 130-36 transmission line in Haverford Township, Delaware County, Pennsylvania. The need for this project is related to the condition and age of the existing wood structures which are at end of life with reliability trending downwards due to wood rot.

B. Description of the Proposed Project

9. The structures that will be replaced and reconditioned are: Structures 13-2 to 13-14, 14-1, 14-3, and 14-5. Structure 14-2 will be removed and will not be replaced due to access challenges and a longer span design. A new structure – Structure 13-1A – will be added to mitigate a potential horizontal clearance risk to the edge of the easement. All of the structures will be located within the existing right-of-way along near the existing center line and near the existing structures. The approximate right of way for the proposed Project is seventy-five (75) feet wide. See PECO Attachment 1 for a map of the proposed Project. Reliability on the 130-36 is expected to increase due to new robust steel structures, conductors, and hardware. The anticipated service life of the new transmission monopoles and appurtenances is expected to be sixty (60) plus years.

10. The sixteen replacement structures will be between 2 feet and 50 feet taller than the existing structures, as detailed in Attachment 2, Question 6. New Structure 13/1A will be 92'. 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 \$6.78 million. \$1.88 of that total is attributable to materials (new monopoles, foundation, and appurtenances). The remaining \$4.9 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 October 7, 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 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 130-36 line is operated at 138kV, consists of sixty-two (62) structures, and is 3.53 miles long, running between PECO’s Bryn Mawr and Llanarch substations along SEPTA’s

Norristown High Speed Line Right of Way. The rebuild area is approximately 1.3 miles long, entirely located in Havertown, Haverford Township, Delaware County, PA. The proposed Project is located within the existing PECO 75-ft easement.

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 Philadelphia International Airport, which is located approximately 8 miles southeast of the 130-36 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 area crosses three (3) small streams/storm drainage areas. The streams are below the 100-acre drainage area threshold and were eligible for waivers per the published waiver requirement in Chapter 105. A PNDI was not required.

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 structures impact 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 grant expedited approval to replace seventeen transmission structures that are at end of life in Havertown, Haverford Township, Delaware 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, S23-1
Philadelphia, PA 19103
215.841.4353 (bus)
215.568.3389 (fax)
anthony.gay@exeloncorp.com
jack.garfinkle@exeloncorp.com
jennedy.johnson@exeloncorp.com
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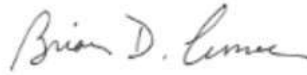
Dated: August 4, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LETTER OF NOTIFICATION OF :
PECO ENERGY COMPANY, FILED :
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HAVERFORD TOWNSHIP, :
DELAWARE COUNTY :
PENNSYLVANIA :

VERIFICATION

I, Brian D. Crowe, hereby declare that I am Vice President of Technical Services 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: Aug. 4, 2022

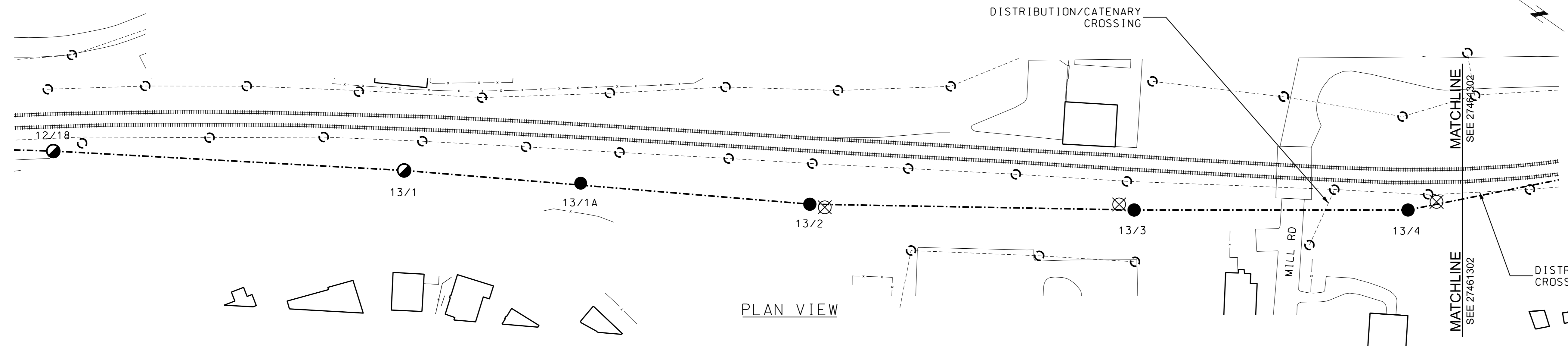
Brian D. Crowe
Vice President of Technical
Services

Attachment 1- Plan and Profile View, Sheet 1 of 5 Structure Locations (Existing and Proposed)

9 SHEET 1 OF 5
C-274613

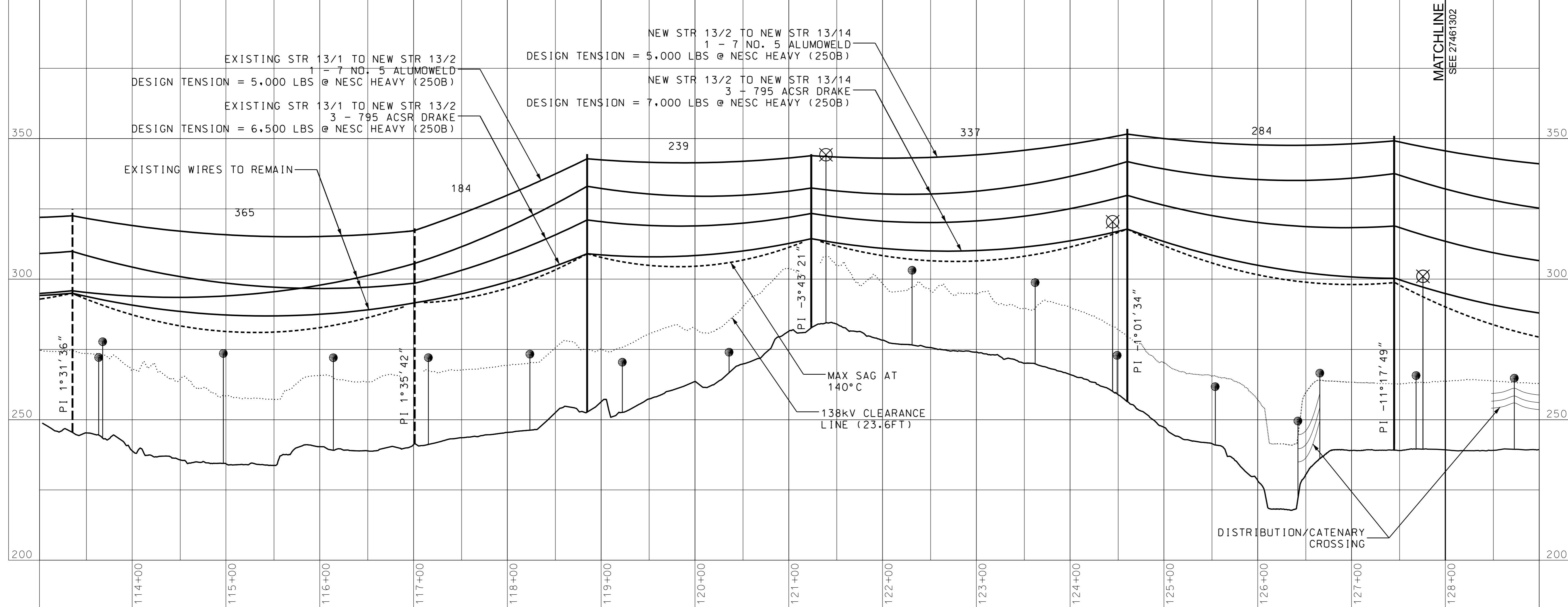
ROUTE ATLINEDE

- PLAN LEGEND:**
- TRANSMISSION CENTERLINE
 - DISTRIBUTION/CATENARY LINE
 - EDGE OF PAVEMENT
 - FENCE
 - RAILROAD
 - PROPOSED STRUCTURE
 - ⊗ EXISTING STRUCTURE TO BE REMOVED
 - EXISTING STRUCTURE TO REMAIN
 - DISTRIBUTION POLE
 - TOP OF BUILDING

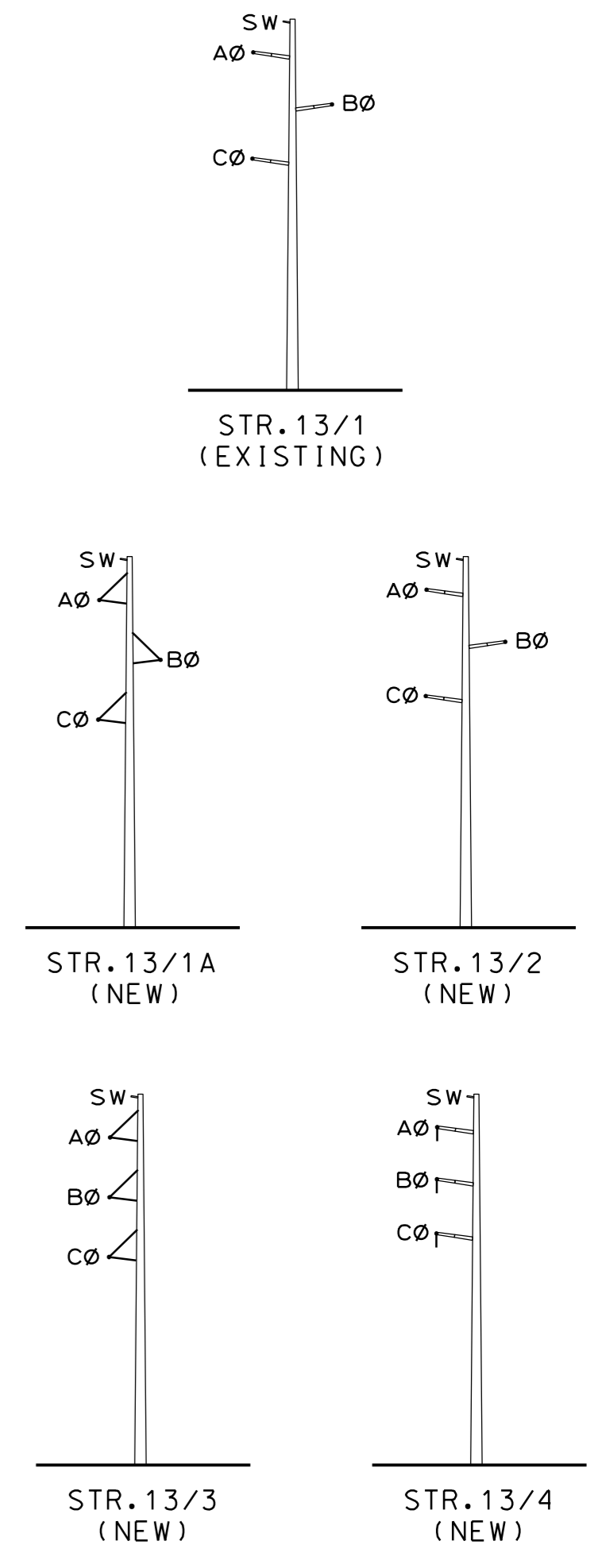


PLAN VIEW

12/18 EXISTING STR TO REMAIN STA=113+36.30 HT=79.53 ELE=245.47	13/1 EXISTING STR TO REMAIN STA=117+01.20 HT=75.00 ELE=241.54 INS ASSY: (3) S-7310-G4 SW ASSY: (1) S-7352-G1 JUMPER INS: (3) S-7110-G4	13/1A SC-138-TAN 130-36 STA=118+85.07 HT=90.00 ELE=252.69 REVEAL = 2.00 FT INS ASSY: (3) B210C061T12075MX WITH Y-CLEVIS, SOCKET EYE & SUSPENSION CLAMP SW ASSY: (1) S-7211-G2	13/2 SC-138-DE 130-36 STA=121+24.04 HT=60.00 ELE=282.67 REVEAL = 2.00 FT INS ASSY: (6) S-7310-G4 SW ASSY: (2) S-7352-G1 JUMPER INS: (3) S-7110-G4	13/3 SC-138-RA(0-10) 130-36 STA=124+60.94 HT=95.00 ELE=256.44 REVEAL = 2.00 FT INS ASSY: (3) B210C061T12075MX WITH Y-CLEVIS, SOCKET EYE & SUSPENSION CLAMP SW ASSY: (1) S-7211-G2	13/4 SC-138-RA(10-20)-LS 130-36 STA=127+45.42 HT=110.00 ELE=239.16 REVEAL = 2.00 FT INS ASSY: (3) S-7110-G4 SW ASSY: (1) S-7211-G2
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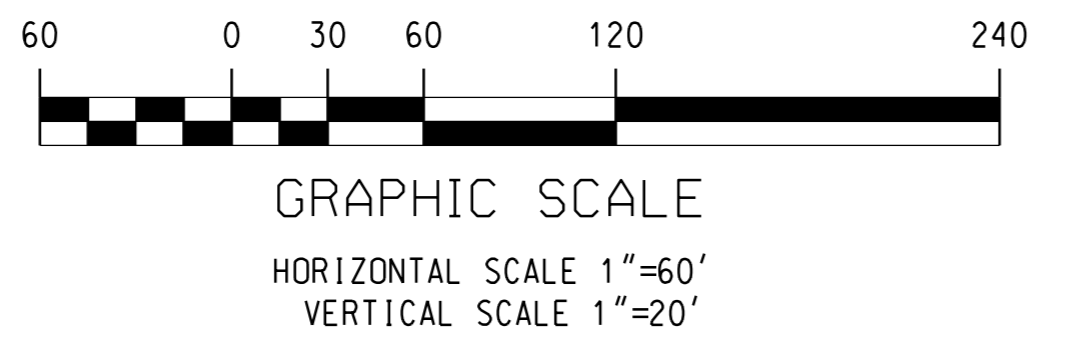
PROFILE VIEW



PHASING DIAGRAM
LOOKING TOWARD LLANERCH
(SEE NOTE 3)

- 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 THE PROVIDED LIDAR DATA. PECO TO PROVIDE EXISTING PHASING INFORMATION.

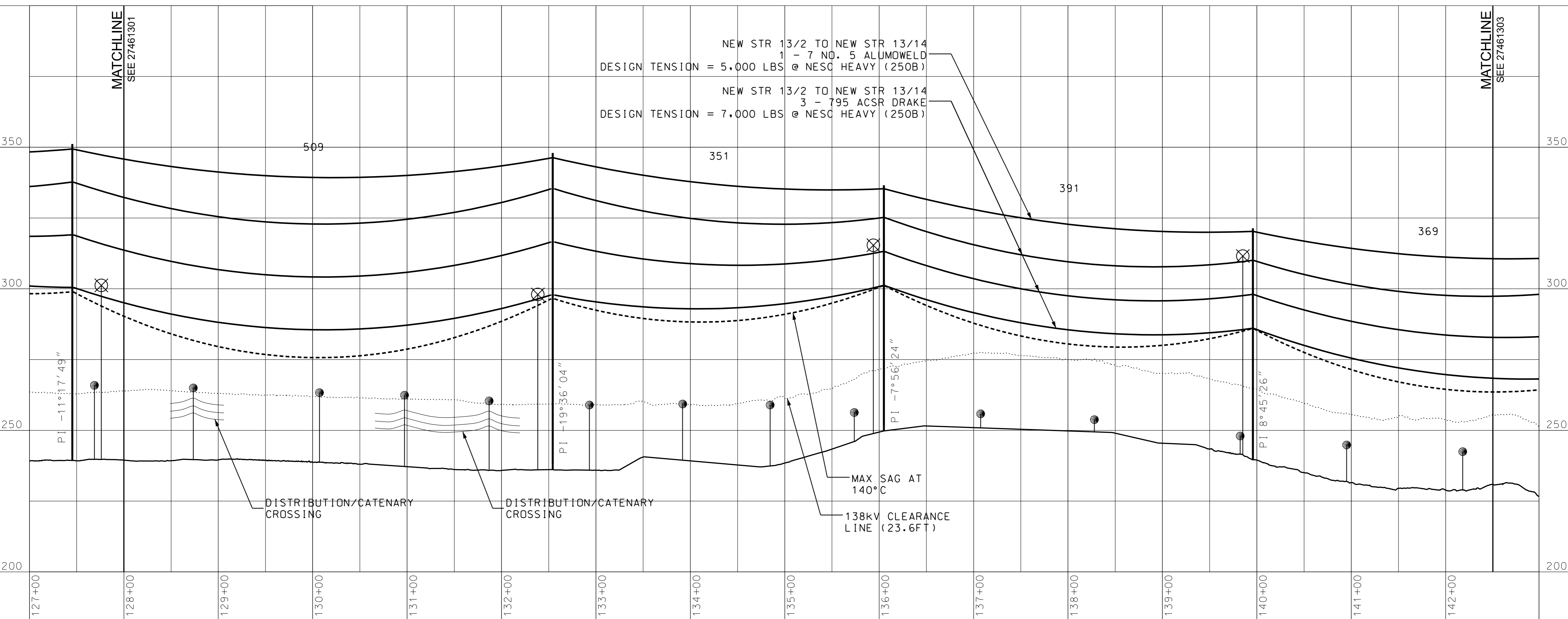
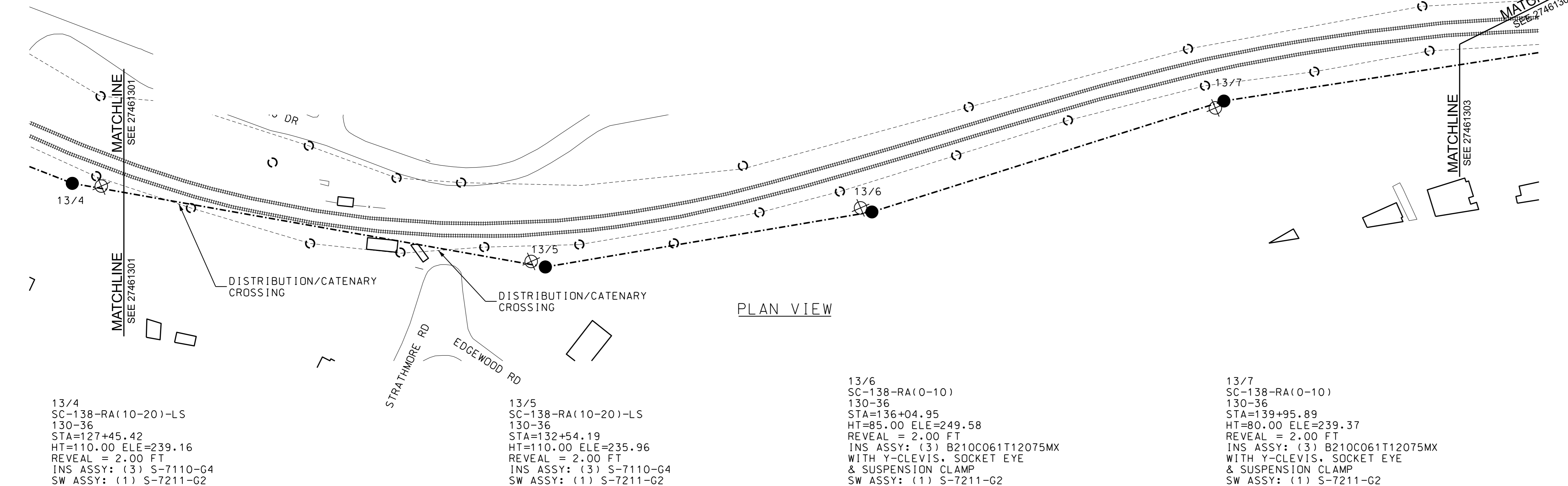


NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A307	EC-254547				
20	WO-16546944				
22	POWER ENGINEERS, INC.				
		CHANGED: ADDED STR 13/1A			
		MOVED STR 14/5			
		ISSUED FOR CONSTRUCTION			
A112	EC-254547				
03	WO-16546944				
21	POWER ENGINEERS, INC.				
		ADDED: ISSUED FOR REVIEW			
A202	EC-254547				
18	WO-16546944				
22	POWER ENGINEERS, INC.				
		ADDED: THIS DRAWING			
		ISSUED FOR CONSTRUCTION			

TRANSMISSION		INDEX C-274612	
PLAN AND PROFILE 130-36 LINE 138kV TRANSMISSION LINE			
BRYN MAWR - LLANERCH PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	PET	PET	PET
INSPECTED	APPROVED	DATE	
		12-03-21	
APPROVED _____	APPROVED _____		
APPROVED _____	APPROVED _____		
APPROVED _____	APPROVED _____		
SHEET 1 OF 5		C-274613-A3	
		PLOT SCALE FILE SCALE	

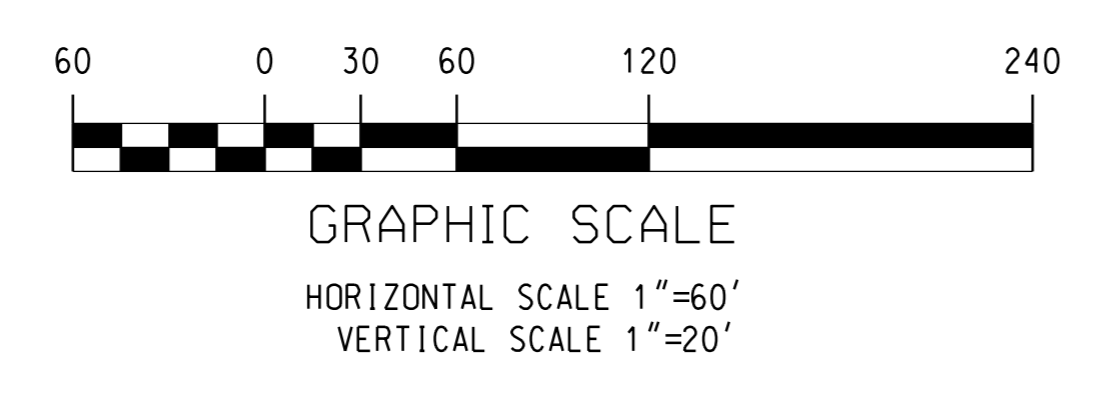
Attachment 1- Plan and Profile View, Sheet 2 of 5 Structure Locations (Existing and Proposed)

C-274613
SHEET 2 OF 5



NOTES:

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



NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A307	EC-254547				
20	WO-16546944				
22	POWER ENGINEERS, INC.				
		CHANGED: ADDED STR 13/1A			
		MOVED STR 14/5			
		ISSUED FOR CONSTRUCTION			
A112	EC-254547				
03	WO-16546944				
21	POWER ENGINEERS, INC.				
		ADDED: ISSUED FOR REVIEW			
A202	EC-254547				
18	WO-16546944				
22	POWER ENGINEERS, INC.				
		ADDED: THIS DRAWING			
		ISSUED FOR CONSTRUCTION			

TRANSMISSION LINE INDEX C-274612						
PLAN AND PROFILE 130-36 LINE 138KV TRANSMISSION LINE						
BRYN MAWR - LLANERCH PECO Energy Company						
SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	PET	PET	PET			12-03-21
APPROVED					APPROVED	
APPROVED					APPROVED	
APPROVED					APPROVED	
SHEET 2 OF 5		C-274613-A3		PLOT SCALE		FILE SCALE

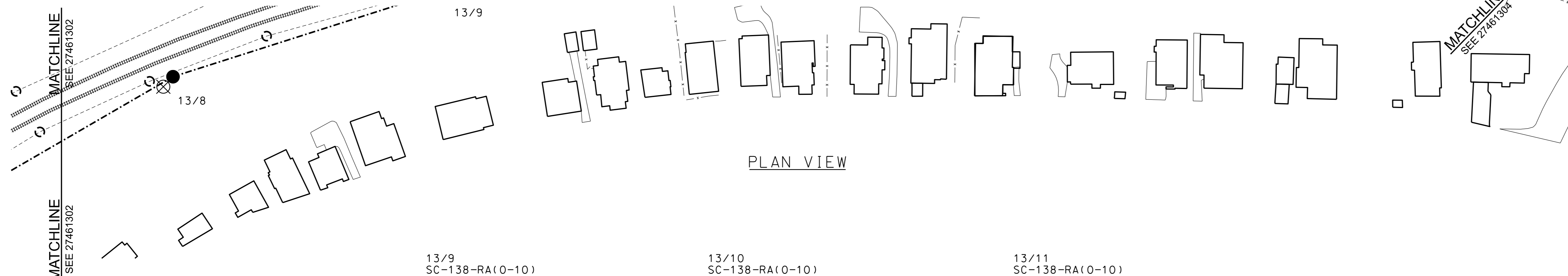
Attachment 1- Plan and Profile View, Sheet 3 of 5 Structure Locations (Existing and Proposed)

C-274613 SHEET 3 OF 5

ROUTE ATLINEDE

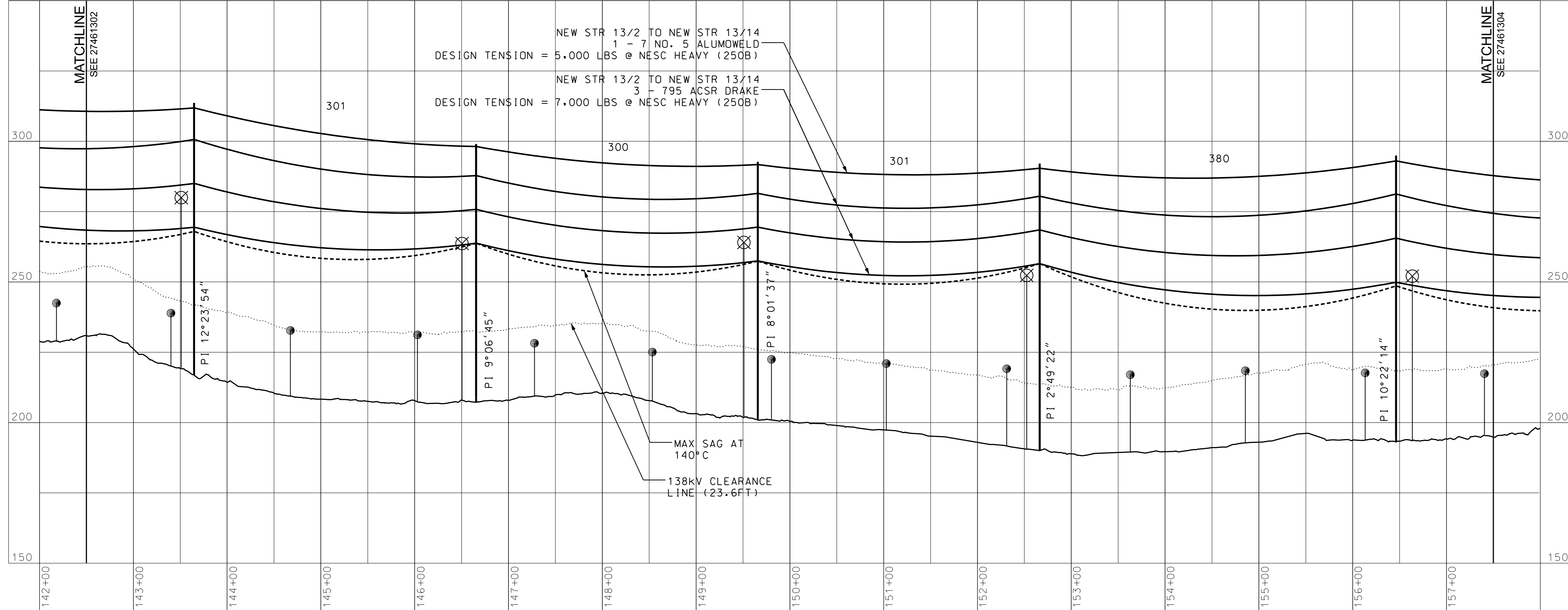
PLAN LEGEND:

- TRANSMISSION CENTERLINE
- DISTRIBUTION/CANTENARY LINE
- EDGE OF PAVEMENT
- FENCE
- RAILROAD
- PROPOSED STRUCTURE
- ⊗ EXISTING STRUCTURE TO BE REMOVED
- EXISTING STRUCTURE TO REMAIN
- DISTRIBUTION POLE
- ⊕ TOP OF BUILDING



PLAN VIEW

<p>13/8 SC-138-RA(10-20) 130-36 STA=143+64.79 HT=95.00 ELE=216.63 REVEAL = 2.00 FT INS ASSY: (3) S-7110-G4 SW ASSY: (1) S-7211-G2</p>	<p>13/9 SC-138-RA(0-10) 130-36 STA=146+65.48 HT=90.00 ELE=207.01 REVEAL = 2.00 FT INS ASSY: (3) B210C061T12075MX WITH Y-CLEVIS, SOCKET EYE & SUSPENSION CLAMP SW ASSY: (1) S-7211-G2</p>	<p>13/10 SC-138-RA(0-10) 130-36 STA=149+65.75 HT=90.00 ELE=200.69 REVEAL = 2.00 FT INS ASSY: (3) B210C061T12075MX WITH Y-CLEVIS, SOCKET EYE & SUSPENSION CLAMP SW ASSY: (1) S-7211-G2</p>	<p>13/11 SC-138-RA(0-10) 130-36 STA=152+66.33 HT=100.00 ELE=189.89 REVEAL = 2.00 FT INS ASSY: (3) B210C061T12075MX WITH Y-CLEVIS, SOCKET EYE & SUSPENSION CLAMP SW ASSY: (1) S-7211-G2</p>	<p>13/12 SC-138-RA(10-20) 130-36 STA=156+46.30 HT=100.00 ELE=192.91 REVEAL = 2.00 FT INS ASSY: (3) S-7110-G4 SW ASSY: (1) S-7211-G2</p>
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PROFILE VIEW

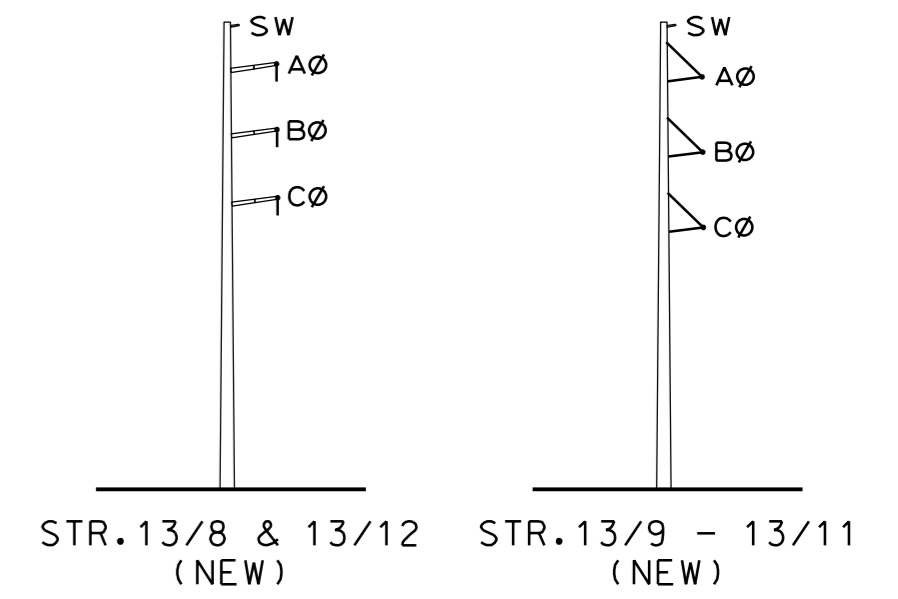
PROFILE LEGEND:

- 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 THE PROVIDED LIDAR DATA. PECO TO PROVIDE EXISTING PHASING INFORMATION.



GRAPHIC SCALE
HORIZONTAL SCALE 1"=60'
VERTICAL SCALE 1"=20'



PHASING DIAGRAM
LOOKING TOWARD LLANERCH
(SEE NOTE 3)

A307 EC-254547
20 WO-16546944
22 POWER ENGINEERS, INC.
CHANGED: ADDED STR 13/1A
MOVED STR 14/5
ISSUED FOR CONSTRUCTION

TABLE OF ADDITIONS & CHANGES USE ONLY PRINTS SHOWING LATEST DATE		REV'D	CHK'D	APP'D
NO.	DATE	DESCRIPTION		
A112	03	EC-254547 WO-16546944 POWER ENGINEERS, INC. ADDED: ISSUED FOR REVIEW	D M G P	G P G
A202	18	EC-254547 WO-16546944 POWER ENGINEERS, INC. ADDED: THIS DRAWING ISSUED FOR CONSTRUCTION	D M G P	G P G

TRANSMISSION LINE INDEX C-274612

PLAN AND PROFILE
130-63 LINE
138kV TRANSMISSION LINE

BRYN MAWR - LLANERCH
PECO Energy Company

SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	PET	PET	PET			12-03-21

APPROVED _____
APPROVED _____
APPROVED _____

SHEET 3 OF 5 C-274613-A3

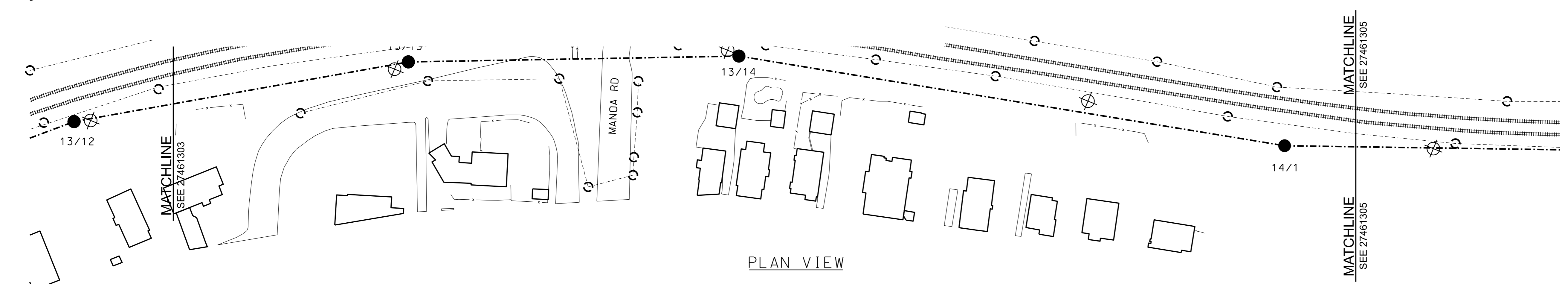
Attachment 1- Plan and Profile View, Sheet 4 of 5 Structure Locations (Existing and Proposed)

C-274613

ROUTE ATL INEED

PLAN LEGEND:

- TRANSMISSION CENTERLINE
- DISTRIBUTION/CANTENARY LINE
- EDGE OF PAVEMENT
- FENCE
- RAILROAD
- PROPOSED STRUCTURE
- ⊗ EXISTING STRUCTURE TO BE REMOVED
- EXISTING STRUCTURE TO REMAIN
- DISTRIBUTION POLE
- ⊕ TOP OF BUILDING



PLAN VIEW

13/12
SC-138-RA(10-20)
130-36
STA=156+46.30
HT=100.00 ELE=192.91
REVEAL = 2.00 FT
INS ASSY: (3) S-7110-G4
SW ASSY: (1) S-7211-G2

13/13
SC-138-RA(0-10)
130-36
STA=160+01.34
HT=80.00 ELE=205.98
REVEAL = 2.00 FT
INS ASSY: (3) B210C061T12075MX
WITH Y-CLEVIS, SOCKET EYE
& SUSPENSION CLAMP
SW ASSY: (1) S-7211-G2

13/14
SC-138-VDE
130-36
STA=163+47.06
HT=90.00 ELE=184.89
REVEAL = 2.00 FT
INS ASSY: (6) S-7310-G4
SW ASSY: (2) S-7352-G1
JUMPER ASSY: (3) H210C0050MXSS026
WITH Y-CLEVIS, SOCKET EYE
& SUSPENSION CLAMP

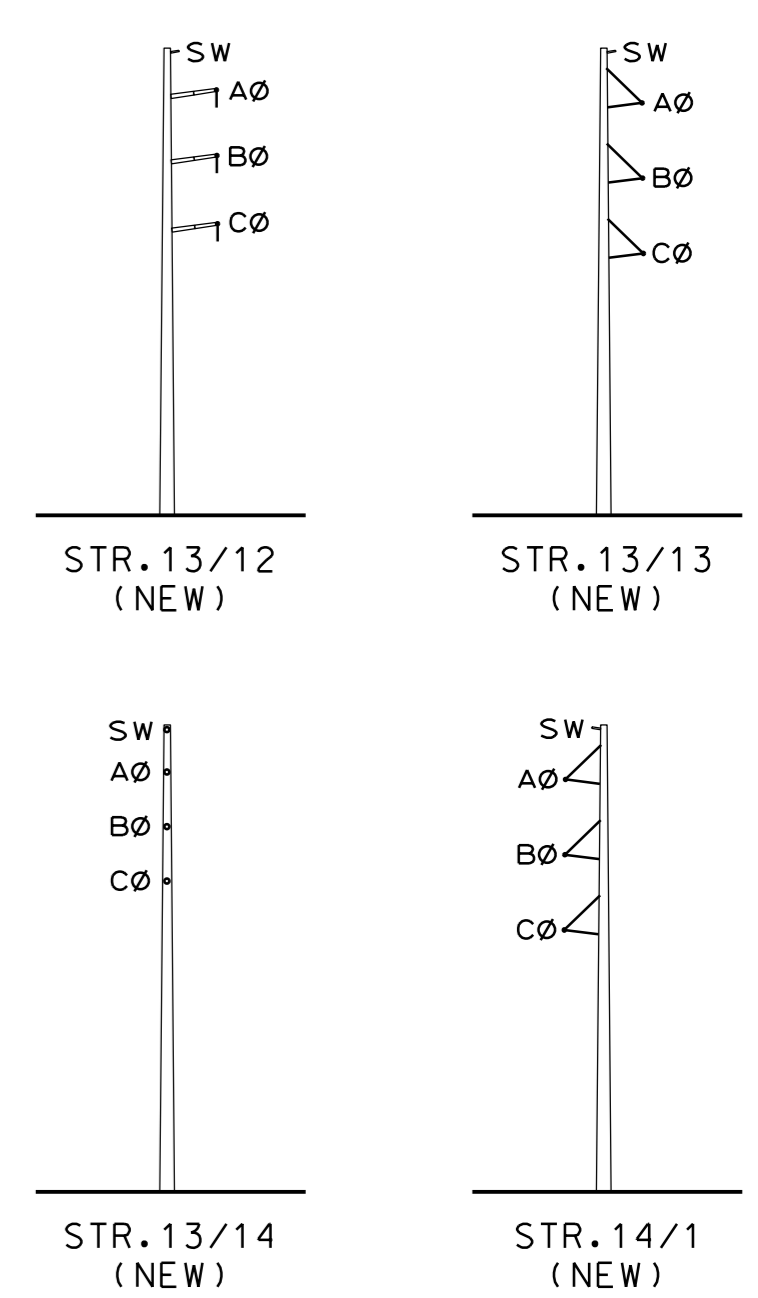
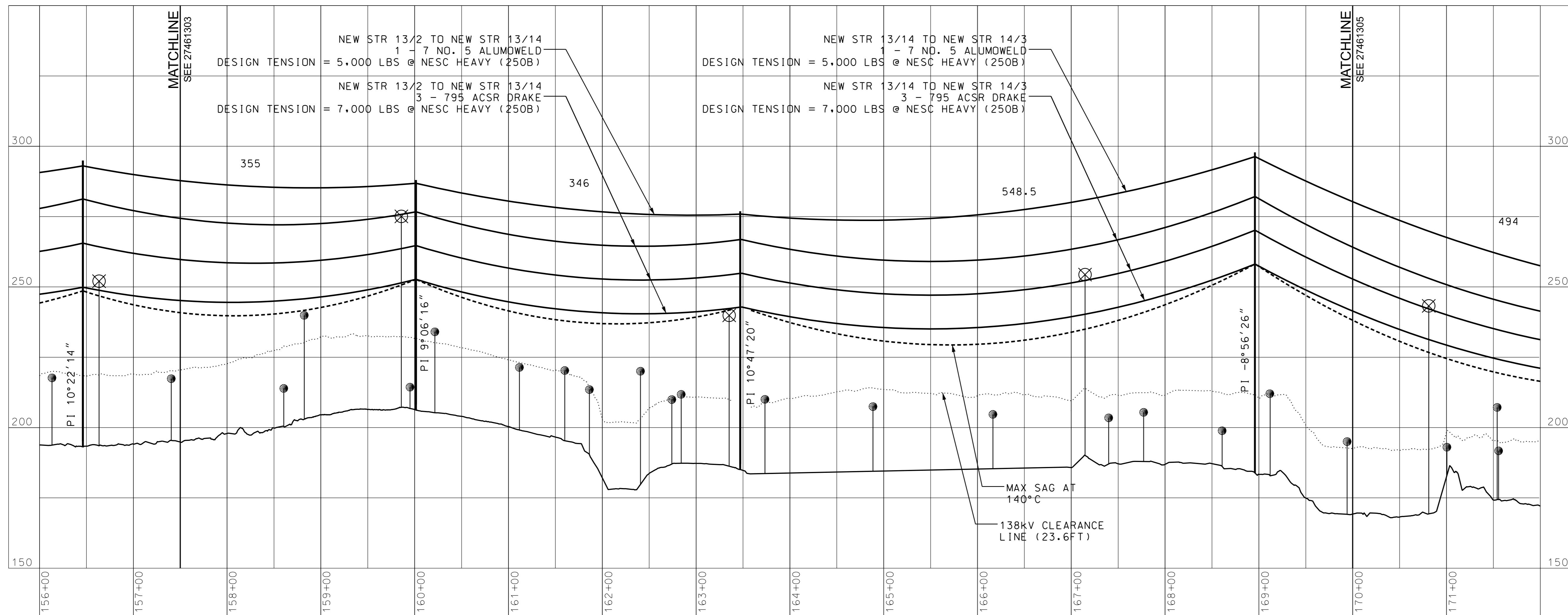
14/1
SC-138-RA(0-10)
130-36
STA=168+95.86
HT=100.00 ELE=195.61
REVEAL = 2.00 FT
INS ASSY: (3) HV-561
WITH Y-CLEVIS, SOCKET EYE
& SUSPENSION CLAMP
SW ASSY: (1) S-7211-G2

NEW STR 13/2 TO NEW STR 13/14
1 - 7 NO. 5 ALUMOWELD
DESIGN TENSION = 5,000 LBS @ NESC HEAVY (250B)

NEW STR 13/2 TO NEW STR 13/14
3 - 795 ACSR DRAKE
DESIGN TENSION = 7,000 LBS @ NESC HEAVY (250B)

NEW STR 13/14 TO NEW STR 14/3
1 - 7 NO. 5 ALUMOWELD
DESIGN TENSION = 5,000 LBS @ NESC HEAVY (250B)

NEW STR 13/14 TO NEW STR 14/3
3 - 795 ACSR DRAKE
DESIGN TENSION = 7,000 LBS @ NESC HEAVY (250B)



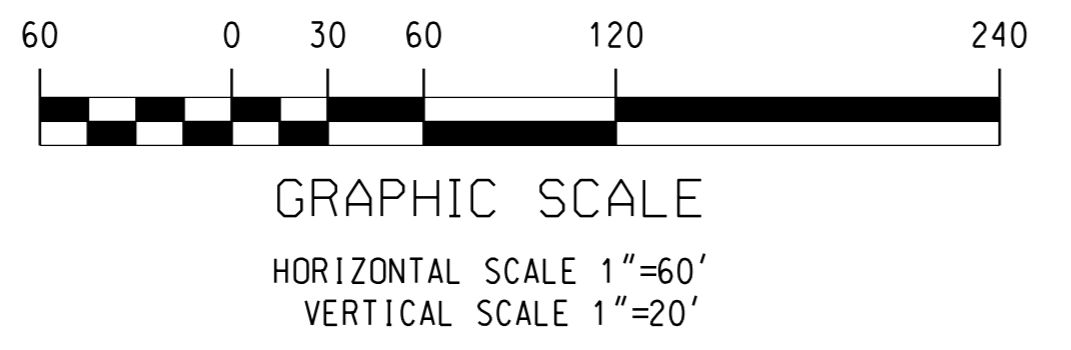
PHASING DIAGRAM
LOOKING TOWARD LLANERCH
(SEE NOTE 3)

PROFILE LEGEND:

- DISTRIBUTION POLE
- ⊗ EXISTING STRUCTURE TO BE REMOVED

PROFILE VIEW

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



NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A307	EC-254547				
20	WO-16546944				
22	POWER ENGINEERS, INC.				
		CHANGED: ADDED STR 13/1A			
		MOVED STR 14/5			
		ISSUED FOR CONSTRUCTION			
A112	EC-254547				
03	WO-16546944				
21	POWER ENGINEERS, INC.				
		ADDED: ISSUED FOR REVIEW			
A202	EC-254547				
18	WO-16546944				
22	POWER ENGINEERS, INC.				
		ADDED: THIS DRAWING			
		ISSUED FOR CONSTRUCTION			

TRANSMISSION LINE INDEX C-274612

PLAN AND PROFILE
130-63 LINE
138kV TRANSMISSION LINE
BRYN MAWR - LLANERCH
PECO Energy Company

SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	PEI	PEI	PEI			12-03-21

APPROVED _____ APPROVED _____
APPROVED _____ APPROVED _____
APPROVED _____ APPROVED _____

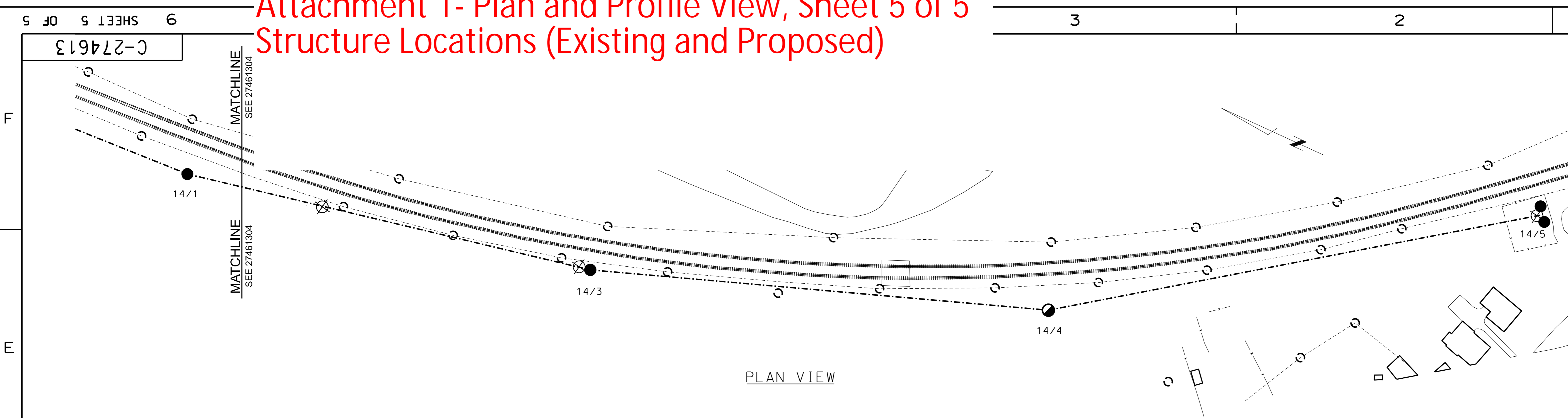
SHEET 4 OF 5 C-274613-A3

Attachment 1- Plan and Profile View, Sheet 5 of 5 Structure Locations (Existing and Proposed)

3 2 1

ROUTE ATLNEDE

- PLAN LEGEND:**
- TRANSMISSION CENTERLINE
 - DISTRIBUTION/CANTENARY LINE
 - EDGE OF PAVEMENT
 - FENCE
 - RAILROAD
 - PROPOSED STRUCTURE
 - ⊗ EXISTING STRUCTURE TO BE REMOVED
 - EXISTING STRUCTURE TO REMAIN
 - DISTRIBUTION POLE
 - TOP OF BUILDING

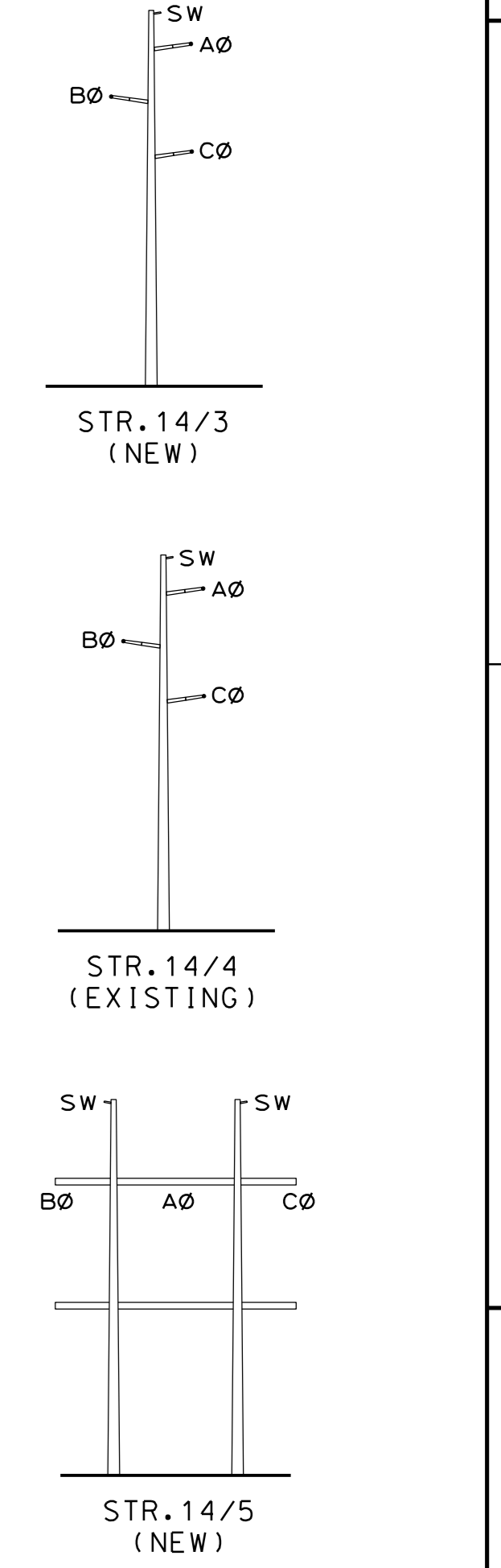
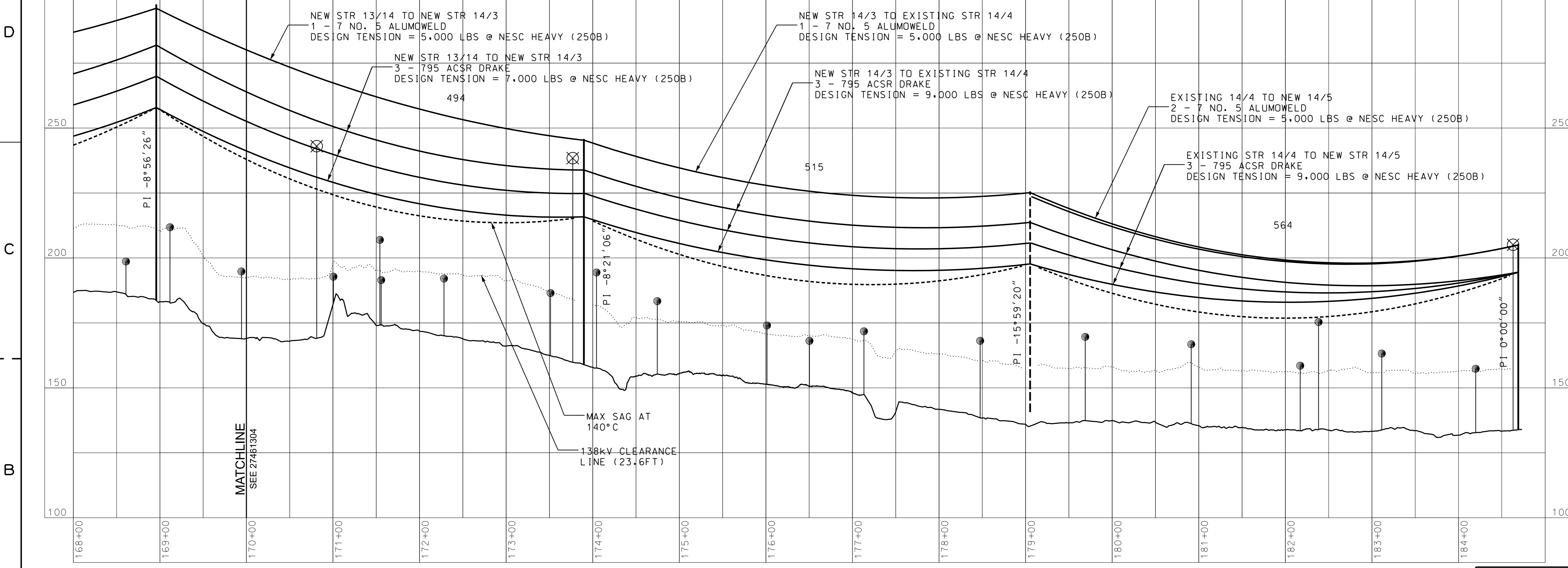


14/1
SC-138-RA(0-10)
130-36
STA=168+95.86
HT=100.00 ELE=195.61
REVEAL = 2.00 FT
INS ASSY: (3) HV-561
WITH Y-CLEVIS, SOCKET EYE
& SUSPENSION CLAMP
SW ASSY: (1) S-7211-G2

14/3
SC-138-DE
130-36
STA=173+89.78
HT=85.00 ELE=159.04
REVEAL = 2.00 FT
INS ASSY: (6) S-7310-G4
SW ASSY: (2) S-7352-G1
JUMPER ASSY: (3) S-7110-G4

14/4
EXISTING STR TO REMAIN
130-36
STA=179.05.14
HT=85.00 ELE=135.14
INS ASSY: (6) S-7310-G4
SW ASSY: (3) S-7352-G1
JUMPER ASSY: (3) S-7110-G4
WELD VANG TO THE AHEAD FLAT
TO SUPPORT THE 2ND WIRE

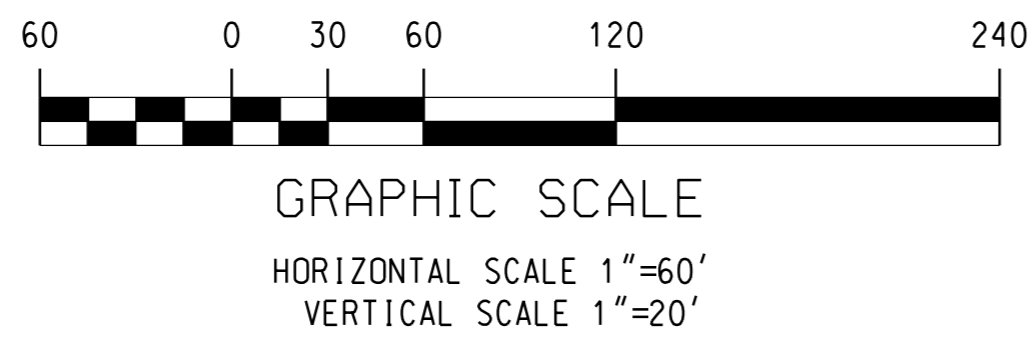
14/5
SC-138-HDE
130-36
STA=184+69.64
HT=70.00 ELE=133.81
INS ASSY: (6) S-7310-G4
SW ASSY: (2) S-7350-G1
JUMPER ASSY: (3) L2-SN361-45
WITH TRUNNION



PHASING DIAGRAM
LOOKING TOWARD LLANERCH
(SEE NOTE 3)

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

- NOTES:**
1. SAG SHOWN AT 60°F FINAL UNLESS OTHERWISE NOTED
 2. 23.6 FT CLEARANCE LINE DISPLAYED FOR CONDUCTOR (138kV)
 3. PHASING IS ASSUMED BASED ON THE PROVIDED LIDAR DATA. PECO TO PROVIDE EXISTING PHASING INFORMATION.



A307	EC-254547	D	G	P
20	WO-16546944	M	Y	G
22	POWER ENGINEERS, INC.			
CHANGED: ADDED STR 13/1A MOVED STR 14/5 ISSUED FOR CONSTRUCTION				

TABLE OF ADDITIONS & CHANGES USE ONLY PRINTS SHOWING LATEST DATE					
NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A112	EC-254547		D	M	P
03	WO-16546944		M	Y	G
21	POWER ENGINEERS, INC.				
ADDED: ISSUED FOR REVIEW					
A202	EC-254547		D	M	P
18	WO-16546944		M	Y	G
22	POWER ENGINEERS, INC.				
ADDED: THIS DRAWING ISSUED FOR CONSTRUCTION					

TRANSMISSION LINE INDEX C-274612

**PLAN AND PROFILE
130-63 LINE
138kV TRANSMISSION LINE**

**BRYN MAWR - LLANERCH
PECO Energy Company**

SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	PEI	PEI	PEI			12-03-21

APPROVED _____ APPROVED _____
APPROVED _____ APPROVED _____
APPROVED _____ APPROVED _____

SHEET 5 OF 5 **C-274613-A3**

PLOT SCALE
FILE SCALE

Letter of Notification Filing Checklist
PECO 130-36 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
2301 Market Street, S23-1
Philadelphia, PA 19103
215-841-4353
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 is requesting approval to remove 17 wood structures that are at end of life – 16 of which will be replaced with new steel monopoles supported on drilled pier foundations along the existing 130-36 transmission line. The structures that will be replaced and reconducted are: Structures 13-2 to 13-14, 14-1, 14-3, and 14-5. Structure 14-2 will be removed and not replaced due to access challenges and a longer span design. A new structure – Structure 13-1A – will be added to mitigate horizontal clearance risks to the edge of the easement.

The 130-36 line consists of a total of 62 structures and is 3.53 miles long; it runs between PECO’s Bryn Mawr and Llanarch substations along the SEPTA’s Norristown High Speed Line Right of Way. The rebuild area is entirely located in Havertown, Delaware County. The proposed project is located within the existing PECO 75-ft easement.

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 1.3 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 130-36 line is operated at 138 kV and consists of 62 structures. 45 existing structures are constructed of steel and are in good condition and will not be replaced. The remaining 17 structures are wooden, 63 years old, and at end of life. The 130-36 line is a key part of PECO's bulk electric system.

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.

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; however, a larger sized conductor will be installed in this 1.3 mile section. The existing 477 kcmil 30/7 ACSR conductor will be replaced with a 795 kcmil 26/7 ACSR conductor. The conductor on the remaining 2.3 miles of the line, where the structures are not being replaced, will remain 477 kcmil 30/7 ACSR.

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.**

Structure Number	Existing Structure Height Above Ground (ft)	New Structure Height Above Ground Including 2ft Foundation Reveal (ft)	Structure Relocation Location (offset from existing)
13/1A*	N/A	92.0	94' East, 158' South
13/2	60.3	62.0	6' West, 14' North
13/3	60.8	97.0	5' East, 16' South
13/4	61.6	112.0	24' West, 19' North
13/5	62.2	112.0	10' East, 12' South
13/6	67.8	87.0	12' East, 12' South
13/7	69.3	82.0	16' East, 1' South
13/8	60.0	97.0	16' East, 3' South
13/9	55.3	92.0	14' East, 7' South
13/10	60.7	93.0	15' East, 7' South
13/11	61.8	102.0	17' East, 6' South
13/12	58.1	102.0	3' West, 15' North
13/13	66.9	82.0	12' East, 12' South
13/14	53.0	92.0	1' West, 15' South
14/1	67.2	102.0	8' West, 182' South
14/2**	74.4	N/A	N/A
14/3	78.2	87.0	5' East, 14' South
14/5	71.5	72.0	6' East, 8' South

*New structure location, offset from Structure 13/1 which will remain

**Structure will be removed but not replaced

Coordinate System: NAD83: 3702 Pennsylvania South, US Survey Ft

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.**

A new structure 13-1A will be placed between the existing structure 13-1 and 13-2. The structure will be placed within PECO's easement on SEPTA property. PECO has the right to install, upgrade, and replace structures in any location along our easement with SEPTA.

- 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 \$6.78 million. \$1,880,000 of that total is attributable to materials (new monopoles, foundation, and appurtenances). The remaining \$4.9 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 10/7/2022 to 11/2/2022. The proposed in-service date of this project is 11/2/2022.

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 17 existing structures with 16 new structures and reconductoring the line as described in the response to Question 6. Structure 14-2 will be removed but not replaced due to access challenges as the line will span over 14-2. A new structure – Structure 13-1A – is being added to mitigate a potential horizontal clearance risk. All of the Structures will be located within the existing right-of-way along near the existing center line and near the existing structures.

See PECO Attachment 1.

The approximate ROW for the proposed project is 75 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, August 4, 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.

Three small streams/storm drainage area were identified. The streams are below the 100-acre drainage area threshold and were eligible for waivers per the published waiver requirement in Chapter 105. A PNDI was not required.

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 17 structures that will be removed (16 of which will be replaced) are wooden, 63 years old, and at end of life. The need for this project is related condition and age of the existing wood structures.

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.**

The 130-36 line had no unplanned outages within the last 8 years.

- 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 130-36 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.

The existing 130-36 wood poles are at end of life with reliability trending downwards due to wood rot. Reliability on the 130-36 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.