



Jennedy S. Johnson
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Telephone 215.841.4353
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August 12, 2022

Via E-Filing & Overnight Mail to:
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Letter of Notification 130-36 of PECO Energy Company for Approval to Remove and Replace Seventeen Wood Transmission Structures in Havertown, Haverford Township, Delaware County, Pennsylvania
Docket No. A-2022-3034261
Utility Code: 110550

Dear Secretary Chiavetta:

Pursuant to the Commission's August 8, 2022 Secretarial Letter in the above-referenced docket, enclosed please find PECO Energy Company's ("PECO") Responses to the Data Requests of the Bureau of Technical Utility Services.

As directed in the Secretarial Letter, the **Confidential** Attachments have been forwarded via overnight mail to Secretary Chiavetta only.

If you have any questions, feel free to contact me directly at (215) 841-4353.

Respectfully submitted,

A handwritten signature in blue ink that reads "JS Johnson". The signature is written in a cursive, flowing style.

Jennedy S. Johnson
Enclosures

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

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission

Letter of Notification of PECO Energy Company
for Approval to Remove & Replace Seventeen Wood Structures
on the 130-36 Transmission Line in
Havertown, Haverford Township, Delaware County, Pennsylvania

Docket No. A-2022-3034261
Utility Code: 110550

Responses of PECO Energy Company
To Data Requests of the
Bureau of Technical Utility Services

August 12, 2022

TUS-A-1:

Reference the Letter of Notification, Certificate of Service. Please provide a certificate of service for the Southeastern Pennsylvania Transportation Authority.

Response:

See Attachment TUS-A-1(a), PECO's Updated Certificate of Service.



Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
 Harrisburg, PA 17105-3265
EFILING - FILING DETAIL

| Date Created | Filing Number |
|--------------|---------------|
| 8/9/2022 | 2429960 |

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Docket Number: A-2022-3034261

Case Description: Certificate of Service - Updated

Transmission Date: 8/9/2022 12:10 PM

Filed On: 8/9/2022 12:10 PM

eFiling Confirmation Number: 2429960

| File Name | Document Type | Upload Date |
|---|------------------------|----------------------|
| Updated COS - LON 130-36 - 8-9-2022.pdf | Certificate of Service | 8/9/2022 12:10:28 PM |

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

No paper submission is necessary for filings under 250 pages.

You can view a record of this filing and previous filings you have submitted to the PUC by using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.



Jennedy S. Johnson
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PECO Energy Company
2301 Market Street / S23-1
Philadelphia, PA 19103

August 9, 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 130-36 of PECO Energy Company for Approval to Remove and Replace Seventeen Wood Transmission Structures in Havertown, Haverford Township, Delaware County, Pennsylvania
Docket No. A-2022-3034261
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Dear Secretary Chiavetta:

Enclosed for filing on behalf of PECO Energy Company is an **Updated Certificate of Service** for the 130-36 Letter of Notification. The Certificate of Service is being updated to reflect service upon the Southeastern Pennsylvania Transportation Authority ("SEPTA"), which was made on August 9, 2022.

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 | : | DOCKET NO.: A-2022-3034261 |
| APPROVAL TO REMOVE AND | : | UTILITY CODE: 110550 |
| REPLACE SEVENTEEN | : | |
| STRUCTURES IN HAVERTOWN | : | |
| HAVERFORD TOWNSHIP, | : | |
| DELAWARE COUNTY, | : | |
| PENNSYLVANIA | : | |

UPDATED CERTIFICATE OF SERVICE

I hereby certify that on this date, a true and correct copy of its *Letter of Notification of PECO Energy Company*, filed on August 4, 2022 in the above-referenced matter, 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):

| | |
|---|---|
| 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 | Teresa Reed Wagner, Executive Director* Office of Small Business Advocate 555 Walnut Street 1 st Floor, Forum Place Harrisburg, PA 17101 tereswagne@pa.gov |
| Patrick M. Cicero, Acting Consumer Advocate * Office of Consumer Advocate 555 Walnut Street 5 th Floor, Forum Place Harrisburg, PA 17101-1923 pcicero@paoca.org | Haverford Township Building & Codes Department Haverford Township Building 1014 Darby Road Havertown, PA 19083 codes@havtwp.org |
| Haverford Township Planning and Zoning Department Haverford Township Building 1014 Darby Road Havertown, PA 19083 mbuchanan@haverfordtownship.org | David R. Burman, Township Manager Haverford Township Manager Haverford Township Building 1014 Darby Road Havertown, PA 19083 dburman@havtwp.org |

| | |
|--|---|
| Larry Holmes, Esquire, President & 6 th Ward Commissioner Haverford Township Board of Commissioners Haverford Township Building 1014 Darby Road Havertown, PA 19083 lholmes@havtwp.org | Monica Taylor, Chair Delaware County Council Government Center 201 W. Front Street Media, PA 19063 taylorm@co.delaware.pa.us |
| Department of Environmental Protection Rachel Carson State Office Building 400 Market Street Harrisburg, PA 17101 | Nancy Moses, Chairman Historical and Museum Commission State Museum Building 300 North Street Harrisburg, PA 17120 |
| Yassmin Gramian, Secretary Department of Transportation Keystone Building 400 North Street, 5 th Floor Harrisburg, PA 17120 | Gino Benedetti ** Southeastern Pennsylvania Transportation Authority (SEPTA) General Counsel 1234 Market Street Philadelphia, PA 19104 GBenedetti@septa.org |

* Served electronically only

** Served on August 9, 2022 (All other parties served on August 4, 2022.)



Dated: Aug. 9, 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

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission

Letter of Notification of PECO Energy Company
for Approval to Remove & Replace Seventeen Wood Structures
on the 130-36 Transmission Line in
Havertown, Haverford Township, Delaware County, Pennsylvania

Docket No. A-2022-3034261
Utility Code: 110550

Responses of PECO Energy Company
To Data Requests of the
Bureau of Technical Utility Services

August 12, 2022

TUS-A-2:

Reference the Letter of Notification, Attachment 2, Section 7. Please explain how the property owner was notified of the additional transmission structure.

Response:

PECO has an easement on SEPTA property to operate and maintain the 130-36 transmission line. The easement permits PECO to repair, upgrade, replace, and improve our transmission facilities within the easement. Additionally, PECO provided the plan and profile drawings, access drawings, and our site-specific work plan to SEPTA for their review and approval.

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission

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Responses of PECO Energy Company
To Data Requests of the
Bureau of Technical Utility Services

August 12, 2022

TUS-A-3:

Reference the Letter of Notification, Paragraph 8. Please provide a detailed description of the health of the transmission line assets to be replaced.

Response:

The health of the existing wood pole H-frames is poor. The wood structures and cross arms are 63 years old and showing many signs of degradation. Pole top rot is an issue on all poles and is impacting the cross-arm connection points. The poles have numerous woodpecker holes and cracking along their length. The typical service life for a transmission wood pole is 40 years.

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission

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Responses of PECO Energy Company
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Bureau of Technical Utility Services

August 12, 2022

TUS-A-4:

Reference the Letter of Notification, Paragraph 8. Please provide a five-year history of maintenance expenses for the transmission facilities to be replaced as part of the proposed project.

Response:

Non-emergent corrective maintenance has been deferred on the wood pole structures on this line due to the structure replacement project. No corrective maintenance expenses have been recorded on this line in the last 5 years. A list of the corrective maintenance work performed on this section of line over the last 20 years has been provided in Confidential Attachment TUS-A-4(a).

**THE ATTACHMENT IS CONFIDENTIAL AND IS SUBMITTED ONLY IN THE
NON-PUBLIC VERSION OF THIS RESPONSE FILED WITH THE
COMMISSION**

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission

Letter of Notification of PECO Energy Company
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Havertown, Haverford Township, Delaware County, Pennsylvania

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Responses of PECO Energy Company
To Data Requests of the
Bureau of Technical Utility Services

August 12, 2022

TUS-A-5:

Reference the Letter of Notification, Paragraph 8. Please 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.

Response:

Per our preventive maintenance program PECO performs a comprehensive visual inspection on a 5-year periodicity on our transmission structures, conductors, hardware, and foundations. The inspection identified these wood poles on the 130-36 line as needing engineering evaluation. PECO Transmission engineering evaluated the poles utilizing past maintenance issues, estimated remaining strength, and engineering judgement to determine the poles were at end of life and needed to be replaced.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

| | | |
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| HAVERFORD TOWNSHIP, | : | |
| DELAWARE COUNTY, | : | |
| PENNSYLVANIA | : | |

VERIFICATION

I, Brian D. Crowe, hereby state that the facts set forth in PECO's Responses to the Bureau of Technical Utility Services' Data Requests, A-1 through A-5, are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to false statements to authorities).

Date: August 12, 2022



Brian D. Crowe
Vice President of Technical Services
PECO Energy Company