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Direct Dial: 215.841.6841
khadijah.scott@exeloncorp.com

May 25, 2022

VIA E-MAIL

Honorable Arlene Ashton
Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market St., Suite 4063
Philadelphia Pa 19107

RE: George and Margaret Robinson v. PECO Energy Company
Docket No.: C-2022-3030593
Date of Hearing: June 7th at 10:00 a.m.

Dear Judge Ashton:

Enclosed please find a copy of PECO Energy Company's Exhibits 1 through 9, which it intends to use in the above referenced hearing. By copy of this letter, I am sending a copy of same to the Complainant.

Please call my direct dial number if you have any questions regarding this case.

Respectfully submitted,

A handwritten signature in blue ink that reads "Khadijah Scott".

Khadijah Scott

KS/ab
Enclosure

Cc: George and Margaret Robinson (via email)

EXHIBIT 1

Event Number: EV2022120317 * Claim Number: 2022120706 * Claimant Name: ROBINSON, GEORGE

Activity Date: 02/09/2022**Date Time Created:**02/09/2022 10:35 AM**Entered by:** Timothy Grow**Note Type:**CL Claimant**Subject:****Important:**No

09-Feb-2022 10:00 AM (Timothy Grow)

Rec'd copy of claim registration form and formal complaint as first information.

Reviewed CIMS account # 35632-01403 for ratepayer Robinson.

Claim registration form was completed by George Robinson alleging that PECO failed to remove a tree that downed an overhead service line to their residence on 01/10/22 @ 2:12 AM. The incident lead to a fire loss to the Robinson home.

Reviewed OMS Event #C22011000001 PF2 call on 01/10/22. The fire call was routed to Joe Guiliano, E.S. ALM who terminated the electric service by removing and plating the AMR meter. A WR #1018208 was issued to remove a triplex service.

Eagle 352 circuit.

An acknowledgement call was placed to Mrs. Robinson who agreed to discuss the fire event. She reported that her and husband, George are third generation owners of a farmhouse said to be built over 300 years ago. She and her daughter were home at the time of the fire. She heard a noise downstairs and left her bedroom to observe an orange glow of fire in a family room. She yelled for her daughter to exit the home and called 911. The home experienced significant fire damage. Five of her cats perished in the fire. Robinson was said to lost art work and family heirlooms. She became very emotional during the conversation. This loss is currently being addressed by her insurance carrier, USAA.

Questioned where the tree had fallen? Robinson replied that PECO provides overhead service to both her home and mother-in-law nearby. She stated there are 4-5 aerial pole spans from the roadway to an aerial transformer on the last pole. The tree was reported to have fallen between the transformer pole and a second pole. The physical force of the tree impact damaged the overhead line, pole and customer service equipment to the residence. She further claims that a family friend has previously removed trees on the property, Writer questioned her husband's form claiming the subject tree that fell should have been removed by PECO. Robinson referred any specific questions to her husband. He is currently deployed in Egypt for the National Guard and was not present at the time of the fire. He is (7) hours ahead of EST. and difficult to reach by telephone. He is not expected to return to the states any time soon.

Mrs. Robinson provided permission for this writer to visit the property to assist in the claim investigation. Advised her that PECO has not been notified by their carrier reporting the fire loss.

Email to Dana Johnson, Manager, Veg Mgmt.

11-Feb-2022 (Timothy Grow)

Attached an email from Eric Reed, Veg Mgmt.

14-Feb-2022 9:23 AM (Timothy Grow)

Returned an voicemail from Mrs. Margaret Robinson who wanted to know when a site inspection will take place.

A review of CIMS Account # 3872600307 noted ratepayer requested PECO inspect a tree/vine on the overhead wire on 06/07/20. The tree trim request was completed on 06/17/20. A second tree trim request was issued on

09/04/20. Mr. Robinson signed a tree removal permission slip on 09/09/20. See attached copy supplied by VEG MGMT. Joe Cairo was the Inspector for Asplundh Tree Expert Company.

The Eagle 352 circuit was trimmed on routine over the period of April-May 2021. See attached copy.

There were no additional tree requests issued from Mr. & Mrs. Robinson after 09/04/20. Fire event 01/10/22.

02/16/22 9:00 AM (TJG)

Met with Mrs. Robinson at her residence. In attendance was SERVPRO Company addressing the fire damage. An inspection was performed to the first floor and basement of the residence. Several photographs were secured by this writer. Robinson stated that her insurance company tagged a receptacle adjacent to a fireplace in the family as the C/O of the fire. See attached photo.

Robinson and her teenage daughter are currently living at a Hyatt Regency in Lionville, PA. Although, her mother-in-law's home located prior to the entrance of her home was not affected by the fire.

PECO serves both properties from its overhead electric distribution line along Horseshoe Lane at Verizon pole #23. A 1-phase primary and neutral travel along the Robinson driveway a total of four pole spans to PECO pole # 18448 supporting a 50 KVA aerial transformer.

A secondary triplex service supplies power to her mother-in-law, Deborah Robinson home. A second overhead triplex service is attached to (2) private property poles and serves the fire site with underground service. Robinson pointed to the uprooted tree location between PECO's transformer pole #18448 and a pp pole adjacent to an out building (original carriage house). See photographs of downed tree.

Writer requested why she placed PECO on notice of the complaint? Robinson claims she requested PECO perform tree trimming to all of the overhead locations and nothing was completed. She was aware that two of the poles were not PECO adding one pole will need to be straightened by her contractor.

Explained PECO's account records to include dates of past visits and tree removals by Asplundh. Advised her that the uprooted tree fell onto her triplex service and given the location, not an area of line clearance requirement by PECO. Advised her that based on my site inspection, this act of nature that downed power line was not caused by PECO. It was not a tree that PECO owned nor had a duty to maintain. Robinson questioned when PECO was returning to reintroduce electric service to her home. I agreed to provide her electrical contractor with further instruction. Aware of the requirement for an Underwriting Certificate.

Once inspected, PECO will reattach the triplex to her pp pole, remake taps at the transformer and set meter.

16-Feb-2022 12:35 PM (Timothy Grow)

Emailed claimant a copy of S&M application for her electrician.

16-Feb-2022 4:10 PM (Timothy Grow)

Spoke to Bob Kershaw, ET Supervisor to request secondary service be remounted on pp pole to appease Mrs. Robinson. Advised taps must remain cut and service off until UW certification. Email to Kershaw.

17-Feb-2022 4:35 PM (Timothy Grow)

Jerry Newell, ET Foreman, Delchester Region contacted this writer after visiting the Robinson Farm. He met Mrs. Robinson and her mother-in-law. Newell viewed the 1/O secondary service downed by the tree. Robinson requested the line not be rehung until tree trimming is completed. Newell advised her that any tree trimming activity to the overhead secondary service would require a private tree trimming company and not Asplundh on behalf of PECO.

Newell was provided the name of the GC, Scott 610.888.6932 and Electrician, Brian 610.291.2488.

17-Feb-2022 5:15 PM (Timothy Grow)

Call placed to Robinson's electrician. He declined the offer for an S&M application. Advised that he has several copies. Brian reported that he must replace one of two pp poles along with interior electrical repairs. Advised him

that once PECO receives an UW certificate, a crew will reattach the downed secondary, make taps at transformer, reinstall meter-understood.

18-Feb-2022 12:01 PM (Timothy Grow)

Call placed to Mrs. Robinson to advise of my phone conversation with her electrician. Also, reiterated the point that PECO/Asplundh will not be performing any tree trimming activity from the transformer pole to her residence, a total of two secondary service spans. Robinson questioned if it was a new policy. She further claims that this section of overhead service was previously trimmed by the utility. She referred me to speak with her husband in Egypt using a whatsapp. I stated that it has always been the line clearing practice of PECO.

Robinson is projecting the house restoration may exceed (10) months in duration.

Ended the conversation that I hope the restoration time is less and her insurance company provides full compensation for the fire loss.

Robinson was previously advised by this writer that the downed tree event was not caused by the utility, PECO. She was in agreement with the statement.

EXHIBIT 2



EXHIBIT 3



EXHIBIT 4



EXHIBIT 5



EXHIBIT 6



EXHIBIT 7

Report Number: PECO DSOMPEART_B20200616123123

Field/WO Number: 582043715 PCAD Number: DSO-20200607-00033 Host System: CIMS
 Circuit: EAGLE 352 County & Address: CHESTER 2604 HORSESHOE TRL

Order Issuance Comments/Description: 06/07/20 03:16 AM

xst Davis Ln the tree and vines are currently pressuring lin, es

Veg Mgmt Follow-Up Office Review

Work Required	Removal Permit
<input type="checkbox"/> YES	<input type="checkbox"/>
Work Code	Voltage
<input type="checkbox"/> DR35	<input type="checkbox"/> 34
Next DPM Trim	Circuit
<input type="checkbox"/> 2021	<input type="checkbox"/> EAGLE 352
Customer	Quad
<input type="checkbox"/> DOOR_HANG	<input type="checkbox"/> 29C3H7
Scheduled Outage	Work Center
<input type="checkbox"/> NO	<input type="checkbox"/> 20850
Outage Type	Foreman 1
<input type="checkbox"/>	<input type="checkbox"/>
Outage Reason	Foreman 2
<input type="checkbox"/>	<input type="checkbox"/>
Outage Duration	Other Foreman
<input type="checkbox"/>	<input type="checkbox"/>

All Facilities

Primary
 Neutral
 Bundle Secondary
 Open Wire Secondary
 Service Triplex
 Rear Bus

Requiring Maintenance

<input type="checkbox"/> SS	<input checked="" type="checkbox"/> 1 PH
<input type="checkbox"/> CCMS	<input type="checkbox"/> 2 PH
<input type="checkbox"/> Rear Bus	<input type="checkbox"/> 3 PH
<input type="checkbox"/> Isolated OW Secondary	<input type="checkbox"/> Srv Wire
<input type="checkbox"/> Isolated Bundled Secondary	
<input checked="" type="checkbox"/> Neutral	<input type="checkbox"/> Other

Tree Conditions

Ingrowth
 Overhang
 Hazard Tree
 Strategic Tree
 Vines
 Broken Limb/Trunk

Crews Required

	Est. Hrs	Act. Hrs
<input type="checkbox"/> 100-Ft Hi-Ranger	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> Manual	<input type="text"/>	<input type="text"/>
<input checked="" type="checkbox"/> Lift	2.0	<input type="text"/>
<input type="checkbox"/> Urban Lift	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> Backyard Lift	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> Log Truck	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> Flaggers	<input type="text"/>	<input type="text"/>

Schedule Date	Interruption Date
<input type="checkbox"/> 07/05/20	<input type="checkbox"/>
Week Ending	Completion Date
<input type="checkbox"/> 07/11/20	<input type="checkbox"/>

Screeener Report Comments

06/16/20 12:31 PM

**JOB COMPLETED BY
 JUAN VARGAS
 DR-36
 DATE: 06/16/2020
 CREW # 021-011**

2604 HORSESHOE TRAIL 19425. ***BACK DOWN DIRT DRIVEWAY*** LEFTSIDE POLE 18446, REMOVE 1 BROKEN VINE COVERED TREE FROM PRIMARY AND NEUTRAL WIRES. DH-BP

EXHIBIT 8



An Exelon Company

PECO
Vegetation Management Department
2301 Market Street, N3-1
Philadelphia, PA 19103

Source Substation: Cromby

Circuit: Eagle 352

Date: 09-09-20

Dear Valued Customer:

PECO's Vegetation Management department is performing tree trimming work in your area. This work reduces the amount of outages caused by trees and other vegetation and ensures safe and reliable electric service for all of our customers. In addition to tree trimming, it may be necessary to remove unhealthy trees that could potentially come in contact with our electrical equipment. There is no charge for this additional work. However, we must ensure you are aware that this additional work will take place on your property.

Please read and sign this notification and send the form back to us via email, fax or mail. You can also call to have the form picked up and speak with a representative during this visit.

EMAIL THIS FORM TO: BARBARA.ZIPPERER@EXELONCORP.COM
FAX TO: (215) 674-3319

OR CALL FOR PICKUP: 1-800-311-6345, OPTION 2

Thank you.

Please read, sign, and return this notification by _____ *****Failure to do so may result in the tree being made safe for PECO's wires; the remainder of the standing stump will be the property owner's responsibility*****

X George Robinson III
PRINT NAME
Owner/Authorizing Agent

X [Signature]
SIGN NAME
Owner/Authorizing Agent

Address/Location: 2604 Horseshoe Tr. Chester Springs 19425

For the purpose of cutting trees or vegetation that may presently interfere, or due to expected growth, will interfere with the overhead lines of PECO; I/We authorize PECO's vegetation management contractor to do whatever is reasonably necessary to accomplish the purpose, as described below. Stump(s) will be treated to prevent future growth. PECO does not remove or grind stumps.

Description: Remove ④ dead ash tree's single phase primary and neutral lines in driveway on right btw p# 18445 and p# 18447 marked with

Brush and debris will be chipped and removed.

Wood will be: 18-24 inch logs left on site

Jim Cairns
PRINT NAME
Vegetation Management Representative

WORK CODE DC 20 WO # _____

Priority Tree Removal



Key Sub

Circuit

Address

Cross St

City / Town

T-Quad

Work Type Lift Manual

Region BM DC PH

Work Details

Remove dead ash tree single phase primary and neutral lines in driveway on right p# 18445 marked with yellow paint chip brush

Work

Tree Location
 Front Prop Rear Prop
 Side Prop Other

Equipment Lift Manual

Permit Acquired Yes No

Flagging Yes No

State Roads Yes No

Leave Wood Yes No

Est. Hours- Lift

Est. Hours- Manual

Tree

TRAQ Rating

Likelihood of Failure
 Improbable Possible
 Probable Imminent

Likelihood of Impact
 Very Low Low
 Medium High

Likelihood of Failure + Impact
 Unlikely Some Likely
 Likely Very Likely

Consequences of Failure
 Negligible Minor
 Significant Severe

Risk Rating
 Low Moderate
 High Extreme

Species

DBH

Tree Count

Facility

Pole #

Phase 3 2 1

Voltage 34kV 13.2kV 4kV

Line Type Solid Fused

Inspection

Date Inspected Inspector Work Date

Date Submitted Phone # QA Date

Standards Met

Priority Tree Removal



Key Sub	Cromby	
Circuit	Eagle 352	
Address	2604 Horseshoe Tr	
Cross St	Davis Ln	
City / Town	Chester Springs	19428
T-Quad	2903 A6	

Work Type

Lift

Manual

Region

BM

DC

PH

Work Details

Remove dead ash tree single phase primary and neutral lines in driveway on right p# 18445 marked with yellow paint chip brush

Work	Tree	Species
<p>Tree Location</p> <p>Front Prop <input checked="" type="checkbox"/> Rear Prop <input type="checkbox"/></p> <p>Side Prop <input type="checkbox"/> Other <input type="checkbox"/></p> <p>Equipment <input checked="" type="radio"/> Lift <input type="radio"/> Manual</p> <p>Permit Acquired Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Flagging Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>State Roads Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Leave Wood <input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Est. Hours- Lift <input type="text" value="7.0"/></p> <p>Est. Hours- Manual <input type="text"/></p>	<p>TRAQ Rating</p> <p>Likelihood of Failure</p> <p>Improbable <input type="checkbox"/> Possible <input type="checkbox"/></p> <p>Probable <input checked="" type="checkbox"/> Imminent <input type="checkbox"/></p> <p>Likelihood of Impact</p> <p>Very Low <input type="checkbox"/> Low <input type="checkbox"/></p> <p>Medium <input type="checkbox"/> High <input checked="" type="checkbox"/></p> <p>Likelihood of Failure + Impact</p> <p>Unlikely <input type="checkbox"/> Some Likely <input type="checkbox"/></p> <p>Likely <input checked="" type="checkbox"/> Very Likely <input type="checkbox"/></p> <p>Consequences of Failure</p> <p>Negligible <input type="checkbox"/> Minor <input type="checkbox"/></p> <p>Significant <input checked="" type="checkbox"/> Severe <input type="checkbox"/></p> <p>Risk Rating</p> <p>Low <input type="checkbox"/> Moderate <input type="checkbox"/></p> <p>High <input checked="" type="checkbox"/> Extreme <input type="checkbox"/></p>	<p><input type="text" value="Ash"/></p> <p>DBH <input type="text" value="22"/></p> <p>Tree Count <input type="text" value="1"/></p>
<p>Facility</p> <p>Pole # <input type="text" value="18445"/></p> <p>Phase 3 <input type="radio"/> 2 <input type="radio"/> 1 <input checked="" type="radio"/></p> <p>Voltage <input checked="" type="radio"/> 34kV <input type="radio"/> 13.2kV <input type="radio"/> 4kV</p> <p>Line Type Solid <input type="radio"/> Fused <input checked="" type="radio"/></p>		

Inspection

Date Inspected	<input type="text" value="09-09-20"/>	Inspector	<input type="text" value="Joe Cairo"/>	Work Date	<input type="text"/>
Date Submitted	<input type="text"/>	Phone #	<input type="text" value="267-216-8908"/>	QA Date	<input type="text"/>
				Standards Met	<input type="text"/>

Priority Tree Removal



Key Sub: Cromby

Circuit: Eagle 352

Address: 2604 Horseshoe Tr

Cross St: Davis Ln

City / Town: Chester Springs 19425

T-Quad: 29B3 Ab

Work Type: Lift Manual

Region: BM DC PH

Work Details

Remove dead ash tree single phase primary and neutral lines in driveway on right p# 18445 marked with yellow paint chip brush

Work	Tree	Species
<p>Tree Location</p> <p>Front Prop <input checked="" type="checkbox"/> Rear Prop <input type="checkbox"/></p> <p>Side Prop <input type="checkbox"/> Other <input type="checkbox"/></p> <p>Equipment: <input checked="" type="radio"/> Lift <input type="radio"/> Manual</p> <p>Permit Acquired: Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Flagging: Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>State Roads: Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Leave Wood: <input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Est. Hours- Lift: <u>5.0</u></p> <p>Est. Hours- Manual: <u> </u></p>	<p>TRAQ Rating</p> <p>Likelihood of Failure</p> <p>Improbable <input type="checkbox"/> Possible <input type="checkbox"/></p> <p>Probable <input checked="" type="checkbox"/> Imminent <input type="checkbox"/></p> <p>Likelihood of Impact</p> <p>Very Low <input type="checkbox"/> Low <input type="checkbox"/></p> <p>Medium <input type="checkbox"/> High <input checked="" type="checkbox"/></p> <p>Likelihood of Failure + Impact</p> <p>Unlikely <input type="checkbox"/> Some Likely <input type="checkbox"/></p> <p>Likely <input checked="" type="checkbox"/> Very Likely <input type="checkbox"/></p> <p>Consequences of Failure</p> <p>Negligible <input type="checkbox"/> Minor <input type="checkbox"/></p> <p>Significant <input checked="" type="checkbox"/> Severe <input type="checkbox"/></p> <p>Risk Rating</p> <p>Low <input type="checkbox"/> Moderate <input type="checkbox"/></p> <p>High <input checked="" type="checkbox"/> Extreme <input type="checkbox"/></p>	<p><u>Ash</u></p> <p>DBH: <u>16</u></p> <p>Tree Count: <u>1</u></p>
<p>Facility</p> <p>Pole #: <u>18445</u></p> <p>Phase: 3 <input type="radio"/> 2 <input type="radio"/> <u>1</u> <input checked="" type="radio"/></p> <p>Voltage: <u>34kV</u> <input checked="" type="radio"/> 13.2kV <input type="radio"/> 4kV <input type="radio"/></p> <p>Line Type: Solid <input type="radio"/> <u>Fused</u> <input checked="" type="radio"/></p>		

Inspection

Date Inspected: 09-09-20 Inspector: Joe Caino Work Date:

Date Submitted: Phone #: 267-216-8908 QA Date:

Standards Met:

Priority Tree Removal



Key Sub: Cromby

Circuit: Eagle 352

Address: 2604 Horseshoe Tr

Cross St: DAVIS Ln

City / Town: Chester Springs 19425

T-Quad: 29 D3 A6

Work Type: Lift 100ft
 Manual

Region: BM
 DC
 PH

Work Details

Remove dead ash tree single phase primary and neutral lines in driveway on right p# 18447 marked with yellow paint chip brush

Work

Tree Location

Front Prop Rear Prop
 Side Prop Other

Equipment: Lift Manual

Permit Acquired: Yes No

Flagging: Yes No

State Roads: Yes No

Leave Wood: Yes No

Est. Hours- Lift: 12.0

Est. Hours- Manual:

Tree

TRAQ Rating

Likelihood of Failure

Improbable Possible
 Probable Imminent

Likelihood of Impact

Very Low Low
 Medium High

Likelihood of Failure + Impact

Unlikely Some Likely
 Likely Very Likely

Consequences of Failure

Negligible Minor
 Significant Severe

Risk Rating

Low Moderate
 High Extreme

Species: Ash

DBH: 26

Tree Count: 1

Facility

Pole #: 18447

Phase: 3 2 1

Voltage: 34kV 13.2kV 4kV

Line Type: Solid Fused

Inspection

Date Inspected: 09-09-20 Inspector: JULCAINO Work Date:

Date Submitted: Phone #: 267-216-8908 QA Date:

Standards Met:

EXHIBIT 9

Priority Trees Removed in 2021 at 2604 Horseshoe Trail

Work Class	Leave Wood	Removal Type	Partial Removal	Haz. Sent to ATE	KeySub Project	Work Area	Tree Species	Risk	Address	City/Town	Work Cmp Date (MM/DD/YY)	DBH (in)	DRG Rec. QA	Standards Met	QA Inspector	Comments	Remote ID
Routine	Yes	Full Removal	N/A	2020-09-10	CROMBY	EAGLE 352	ASH	high	2604 HORSESHOE TRL	CHESTER SPRINGS	2021-01-09	26	2021-01-13	Yes	Chris Dolan 267-254-6903	REMOVE DEAD ASH TREE SINGLE PHASE PRIMARY AND NEUTRAL LINES IN DRIVEWAY ON RIGHT POLE 18447 MARKED WITH YELLOW PAINT CHIP BRUSH	TXB20200910145513
Routine	Yes	Full Removal	N/A	2020-09-10	CROMBY	EAGLE 352	ASH	high	2604 HORSESHOE TRL	CHESTER SPRINGS	2021-01-09	32	2021-01-13	Yes	Chris Dolan 267-254-6903	REMOVE DEAD ASH TREE SINGLE PHASE PRIMARY AND NEUTRAL LINES IN DRIVEWAY ON RIGHT POLE 18445 MARKED WITH YELLOW PAINT CHIP BRUSH	TXB20200910145146
Routine	Yes	Full Removal	N/A	2020-09-10	CROMBY	EAGLE 352	ASH	high	2604 HORSESHOE TRL	CHESTER SPRINGS	2021-01-09	22	2021-01-13	Yes	Chris Dolan 267-254-6903	REMOVE DEAD ASH TREE SINGLE PHASE PRIMARY AND NEUTRAL LINES IN DRIVEWAY ON RIGHT POLE 18445 MARKED WITH YELLOW PAINT CHIP BRUSH	TXB20200910145306
Routine	Yes	Full Removal	N/A	2020-09-10	CROMBY	EAGLE 352	ASH	high	2604 HORSESHOE TRL	CHESTER SPRINGS	2021-01-09	16	2021-01-13	Yes	Chris Dolan 267-254-6903	REMOVE DEAD ASH TREE SINGLE PHASE PRIMARY AND NEUTRAL LINES IN DRIVEWAY ON RIGHT POLE 18445 MARKED WITH YELLOW PAINT CHIP BRUSH	TXB20200910145411