

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17120**

Public Meeting held September 15, 2022

Commissioners Present:

Gladys Brown Dutrieuille, Chairman
John F. Coleman, Jr., Vice Chairman
Ralph V. Yanora

Letter of Notification of PECO Energy Company
for approval to Remove and Replace Wood
Transmission Structures on the 130-36 138 kV
Transmission Line located in Haverford
Township, Delaware County, Pennsylvania

Docket Number:
A-2022-3034261

ORDER

BY THE COMMISSION:

On August 4, 2022, PECO Energy Company (PECO), Utility Code 110550, filed a Letter of Notification (LON) pursuant to 52 Pa. Code § 57.72(d)(1)(vi) of the Pennsylvania Public Utility Commission's (Commission) transmission line siting regulation. For the reasons expressed in this Order, the LON is approved.

Copies of the LON were served in accordance with Section 57.72(d)(3) and 57.74(b) & (c), 52 Pa. Code §§ 57.72(d)(3), 57.74(b) & (c), on the PA Department of Transportation, PA Department of Environmental Protection, PA Historical and Museum Commission,

Delaware County Commissioners, Haverford Township, *et al.* No protests were filed. No hearings were held.

PECO requests approval to remove and replace wood transmission structures on the 130-36 138 kV Transmission Line (130-36) in Haverford Township, Delaware County, Pennsylvania. The structures to be replaced are located along an approximately 1.3-mile section of the 130-36 transmission line which spans approximately 3.53 miles from PECO's Bryn Mawr substation to its Llanerch Substation. PECO states that the line includes 17 wood pole structures and 45 steel pole structures. The steel structures remain in good health. Application ¶¶8, 16 and Attachment 2. § 4.

PECO submits that removing and replacing the wood structures on the 130-36 transmission line (Proposed Project) is necessary to resolve the asset health condition of the structures. PECO submits that per its preventive maintenance program it performs a comprehensive visual inspection on a 5-year periodicity on transmission structures, conductors, hardware, and foundations and that the inspection identified the wood poles on the 130-36 line as needing engineering evaluation. PECO further submits that its transmission engineering evaluated the poles utilizing past maintenance issues, estimated remaining strength, and engineering judgement to determine the poles are at end of life and need to be replaced. Application ¶8 and PECO Data Request Response No. 5.

PECO further states that the subject structures are approximately 63 years in age and that the wood H-frame structures on the 130-36 transmission line are in poor condition and showing many signs of degradation. PECO states that the poles have numerous woodpecker holes, cracking along their length, and that top rot is an issue on all poles. PECO further states that these issues are impacting the cross-arm connection points. Finally, PECO states that the anticipated service life for a wood transmission pole is 40 years. Application ¶8 and PECO Data Request Response No. 3.

PECO avers that to address these issues it will remove the existing conductors and 17 wood pole structures and install new conductors and hardware supported on 16 new steel monopoles. PECO also avers that the new structures will be supported on drilled pier foundations and will range from approximately 62 feet in height to 112 feet in height. PECO further avers that the existing transmission structures range from approximately 53 feet in height to 74 feet in height. Finally, PECO avers that the Proposed Project has been designed and will be built within a 75-foot-wide existing right-of-way (ROW) of the 130-36 transmission line and that no new ROW is needed. Application ¶¶8-9 and Attachment §6.

PECO asserts that the Proposed Project will be designed, constructed, operated and maintained in a manner that meets or surpasses all applicable PECO and National Electrical Safety Code minimum standards and all applicable legal requirements. Application ¶¶14-15.

PECO states that the total estimated cost for the Proposed Project is approximately \$6.78 million and will be paid for by PECO. Construction of the project is anticipated to commence in October 2022 with a proposed in-service date of November 2022. Application ¶11 and Attachment 2, §11.

Section 57.72 authorizes the abbreviated LON siting application process in lieu of an application for the following:

- (i) An HV line which is proposed to be located entirely on an existing transmission line right-of-way, so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.

- (ii) An HV line which is proposed to be located entirely within a public road.

- (iii) An HV line which is proposed to be located entirely within applicant's existing transmission line right-of-way and the property of the sole customer to be served by the line, so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.
- (iv) A line for which the voltage is proposed to be increased above its present levels so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.
- (v) An HV line which is to be reconductored or reconstructed so long as the size, character, design or configuration of the proposed HV line does not substantially alter the right-of-way
- (vi) An HV line having a proposed route of 2 miles or less.

52 Pa. Code § 57.72(d).

We agree with PECO that the formal PECO Letter of Notification and manner in which it was filed conforms to the requirements of 52 Pa. Code § 57.72(d)(1)(vi) because the Proposed Project removes and replaces the existing wood pole transmission structures on a section of the 130-36 transmission line that is less than 2 miles in length. Moreover, the Commission has reviewed the filing and does not find it to be inconsistent with the applicable law or Commission policy regarding transmission line siting and, therefore, to be in the public interest.

We also note that our approval of the Letter of Notification does not address the issues of accounting treatment, and cost recovery; **THEREFORE,**

IT IS ORDERED:

1. That the Letter of Notification filed by PECO Energy Company for approval to Remove and Replace Wood Transmission Structures on the 130-36 138 kV Transmission Line located in Haverford Township, Delaware County, Pennsylvania, is hereby approved.
2. That upon completion of the subject project, PECO Energy Company shall file the final project cost with the Commission.
3. That upon completion of Ordering Paragraph 2, this proceeding at Docket No. A-2022-3034261 be closed.

BY THE COMMISSION,



Rosemary Chiavetta
Secretary

ORDER ADOPTED: September 15, 2022

ORDER ENTERED: September 15, 2022