



AN EXELON COMPANY

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

May 3, 2023

**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 Partially Reconductor the Croydon-Burlington 220-30 Line located in Bristol Township, Bucks County, Pennsylvania  
Docket No. A-2023-\_\_\_\_\_

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PECO Energy Company is a Letter of Notification (“LON”) requesting approval to partially reconductor PECO’s Croydon-Burlington 220-30 line in Bristol Township, Bucks County, Pennsylvania. PJM’s Regional Transmission Expansion Plan (“RTEP”) analysis identified thermal overload of the Croydon-Burlington line (220-30) for the loss of various system elements; PECO was therefore directed by PJM to reconductor this portion of the 220-30 line. This LON is filed pursuant to the Pennsylvania Public Utility Commission’s regulations at 52 Pa. Code § 57.72(d)(1).

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](mailto:dbacker@pa.gov)  
Jordan Van Order, [jvanorder@pa.gov](mailto: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,** : **Docket No. A-2023- \_\_\_\_\_**  
**FOR APPROVAL TO PARTIALLY** :  
**RECONDUCTOR THE** :  
**CROYDON-BURLINGTON 220-30** :  
**LINE LOCATED IN BRISTOL** :  
**TOWNSHIP, BUCKS 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 &amp; Chief Prosecutor*          Pennsylvania Public Utility Commission          Bureau of Investigation and Enforcement          Commonwealth Keystone Building          400 North Street          Harrisburg, PA 17120  <a href="mailto:rkanaskie@pa.gov">rkanaskie@pa.gov</a></p>	<p>Office of Small Business Advocate*          555 Walnut Street          1<sup>st</sup> Floor, Forum Place          Harrisburg, PA 17101  <a href="mailto:ra-sba@pa.gov">ra-sba@pa.gov</a></p>
<p>Patrick M. Cicero, Consumer Advocate*          Office of Consumer Advocate          555 Walnut Street          5<sup>th</sup> Floor, Forum Place          Harrisburg, PA 17101-1923  <a href="mailto:pcicero@paoca.org">pcicero@paoca.org</a></p>	<p>James McMahon, Chairperson*          Bristol Township Zoning Board          2501 Bath Road          Bristol, PA 19007  <a href="mailto:jmcmahon@bristoltownship.org">jmcmahon@bristoltownship.org</a></p>
<p>John A. Greer, III, Chairperson*          Bristol Township Planning Commission          2501 Bath Road          Bristol, PA 19007  <a href="mailto:jgreer@bristoltownship.org">jgreer@bristoltownship.org</a></p>	<p>Robert McTague, Director*          Bristol Township Building &amp; Planning          2501 Bath Road          Bristol, PA 19007  <a href="mailto:rmctague@bristoltownship.org">rmctague@bristoltownship.org</a>  <a href="mailto:li@bristoltownship.org">li@bristoltownship.org</a></p>

<p>Craig Bowen, Council President*          Bristol Township Council          2501 Bath Road          Bristol, PA 19007  <a href="mailto:cbowen@bristoltownship.org">cbowen@bristoltownship.org</a></p>	<p>Randee Elton, Township Manager*          Bristol Township          2501 Bath Road          Bristol, PA 19007  <a href="mailto:relton@bristoltownship.org">relton@bristoltownship.org</a></p>
<p>Robert J. Harvie, Jr., Board Chair*          Bucks County Board of Commissioners          Bucks County Administration Bldg.          55 East Court Street          Doylestown, PA 18901  <a href="mailto:CommHarvie@buckscounty.org">CommHarvie@buckscounty.org</a></p>	<p>Department of Environmental          Protection          Rachel Carson State Office          Building          400 Market Street          Harrisburg, PA 17101</p>
<p>Yassmin Gramian, Secretary          Department of Transportation          Keystone Building          400 North Street, 5<sup>th</sup> Floor          Harrisburg, PA 17120</p>	<p>Nancy Moses, Chairman          Historical and Museum          Commission          State Museum Building          300 North Street          Harrisburg, PA 17120</p>

\* Served electronically only



Dated: May 3, 2023

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](mailto:jennedy.johnson@exeloncorp.com)

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**LINE LOCATED IN BRISTOL** :  
**TOWNSHIP, BUCKS COUNTY,** :  
**PENNSYLVANIA** :

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**LETTER OF NOTIFICATION**

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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 partially reconductor PECO’s Croydon-Burlington 220-30 Line located in Bristol Township, Bucks County, Pennsylvania (the “Project”). 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](mailto: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
- 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 reconductoring a portion of PECO's Croydon-Burlington 220-30 Line located in Bristol Township, Bucks County, Pennsylvania. The existing 220-30 line is operated at 230 kV and is part of the national bulk electric system. The need for this project was identified through the PJM Interconnection, LLC ("PJM") Regional Expansion Transmission Plan ("RTEP") process. The RTEP process consists of annually evaluating the transmission grid to determine system upgrades necessary to address reliability, market efficiency, and operational needs that keep electricity flowing to the millions of people throughout PJM's region. As part of PJM's analysis of both 1) the generator retirements for Pedricktown and Newark Bay ("2022 Generator Deactivation") and 2) the 2026 RTEP summer evaluation ("2026 Reliability Study"), PJM identified thermal overload of the Croydon-Burlington line (220-30) for the loss of various system elements. PECO was directed by PJM to reductor this portion of the 220-30 line.

### **B. Description of the Proposed Project**

9. This project involves the partial reconductoring of PECO's 220-30 line. The 220-30 line is 1.4 miles long and has a 300' wide right of way. The line will be reducted from Croydon substation to PECO Structure 1-9, a total of 0.8 miles. The project will utilize existing structures, and there will be no new structures or replacements. As discussed in paragraph 8, above, this project was identified through PJM's RTEP process. The proposed project is located entirely within Bristol Township and Borough, Bucks County, Pennsylvania.

10. The project will utilize existing structures, there will be no new structures or replacements.

11. PECO estimates the total project costs to be \$1.3 million. \$210,000 of that cost is attributed to materials (new conductor/hardware). The remaining costs are attributable to direct labor – primary engineering and design, clearance reviews, and electrical construction – and allocated PECO overhead and management costs. PECO will own, finance, and build the proposed project.

12. Upon Commission approval, the Project has a scheduled construction start date of November 25, 2023. The proposed in-service date of the project is December 16, 2023. This project requires a transmission outage. The outage for the reconductoring work is currently scheduled for November 25, 2023 to December 16, 2023.

### **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 220-30 line is 1.4 miles long and has a 300' wide right of way. The line will be reconducted from Croydon substation to PECO Structure 1-9, a total of 0.8 miles. The project will utilize existing structures, and there will be no new structures or replacements. The proposed project is located entirely within Bristol Township and Borough, Bucks County, Pennsylvania.

17. PECO does not anticipate vegetation management being required as a result of this LON.

18. The closest airport to the Project area is Northeast Philadelphia Airport which is located approximately 6 miles west of the 220-30 line. In addition, there is a helipad adjacent to one end of the project location. PECO does not anticipate any interference with airport operations because there will be no change in structure locations or heights. 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 one (1) wetland area. The area is a tributary area to the Delaware River, a stream that is approximately 50 ft. wide. This area will be crossed aerially to eliminate ground disturbance within the vicinity of the wetland. Since the wetland crossing is aerial, it is anticipated that a permit and PNDI will not be required.

22. The Project is not expected to have any impacts on communications towers, pipelines, or other utilities.

23. The project is partially located within a 100-year floodplain. Two of the existing structures are located within the 100-year floodplain.

## **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 pursuant to three Provisions of 52 Pa Code §57.72(d)(1):

- 52 Pa Code §57.72(d)(1)(i): An HV line which is to be recondored 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* Attachment 2, 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 which is to be recondored 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* Attachment 2, PECO answer to Questions 3, 4, and 12, for a description of the partial recondoring.
- 52 Pa Code §57.72(d)(1)(vi): An HV line having a proposed route of 2 miles or less. *Note:* The route of this project work is approximately 0.8 miles.

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 the Pennsylvania Public Utility Commission grant approval to partially reconductor PECO's Croydon-Burlington 220-30 line located in Bristol Township, Bucks 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 stylized, cursive font, followed by the name "Johnson" in a similar 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)  
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[anthony.gay@exeloncorp.com](mailto:anthony.gay@exeloncorp.com)  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)  
[jennedy.johnson@exeloncorp.com](mailto:jennedy.johnson@exeloncorp.com)

Dated: May 3, 2023

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**TOWNSHIP, BUCKS COUNTY,** :  
**PENNSYLVANIA** :

**VERIFICATION**

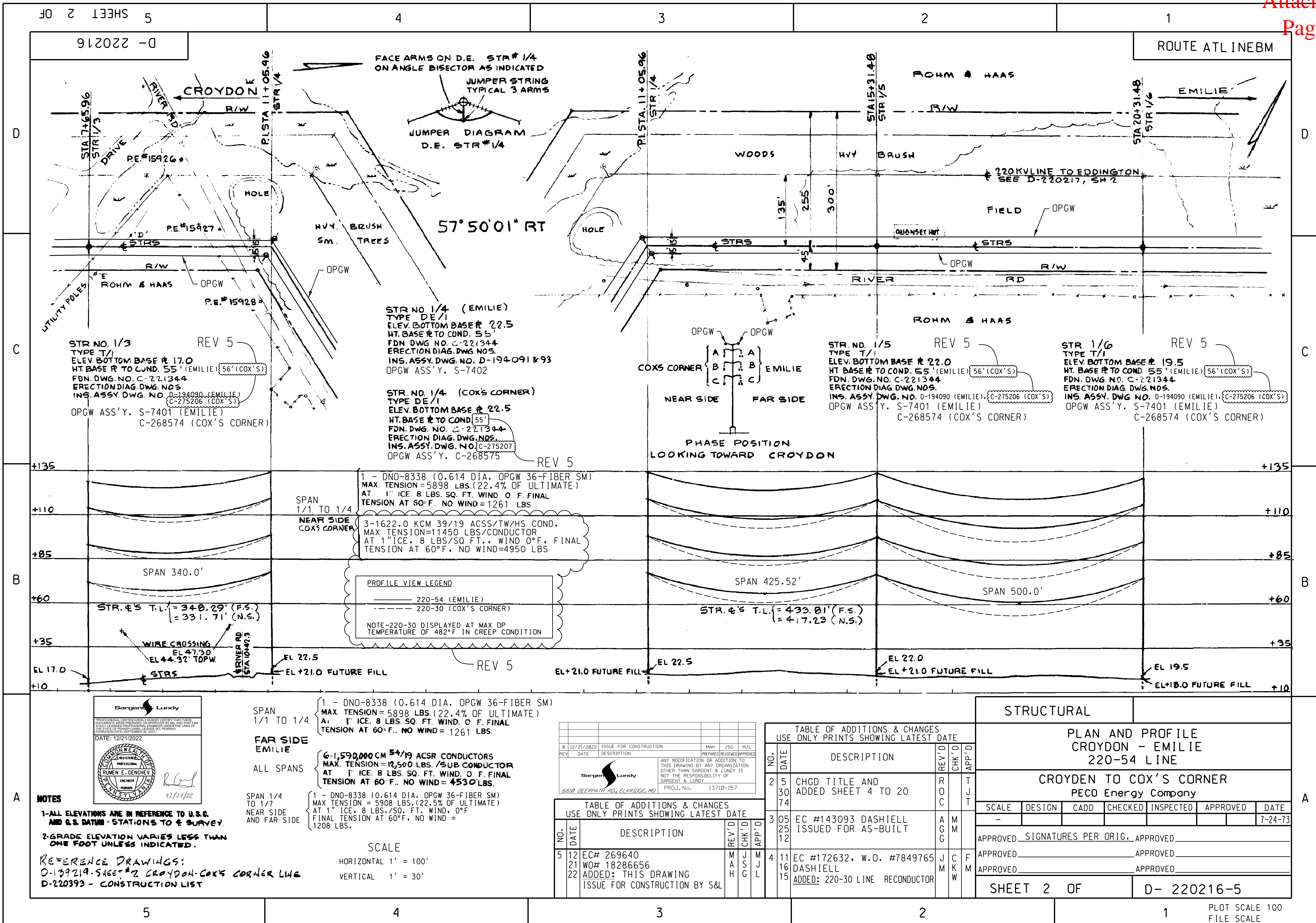
I, Drew T. Davis, hereby declare that I am Vice President, Transmission and Substation for PECO Energy Company; hereby state that the facts set forth in the above-captioned Letter of Notification are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to 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: May 3, 2023



Drew T. Davis  
Vice President, Transmission  
and Substation





JO 2 SHEET 5

4

3

2

1

912022 - D

ROUTE ATL INEBM

**STR. NO. 1/3**  
TYPE T/1  
ELEV. BOTTOM BASE # 17.0  
HT. BASE # TO COND. 55' (EMILIE) {56' (COX'S)}  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. D-194090 (EMILIE), C-275206 (COX'S)  
OPGW ASS'Y. S-7401 (EMILIE), C-268574 (COX'S CORNER)

**STR. NO. 1/4 (EMILIE)**  
TYPE DE/1  
ELEV. BOTTOM BASE # 22.5  
HT. BASE # TO COND. 55'  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. D-194091 & 93  
OPGW ASS'Y. S-7402

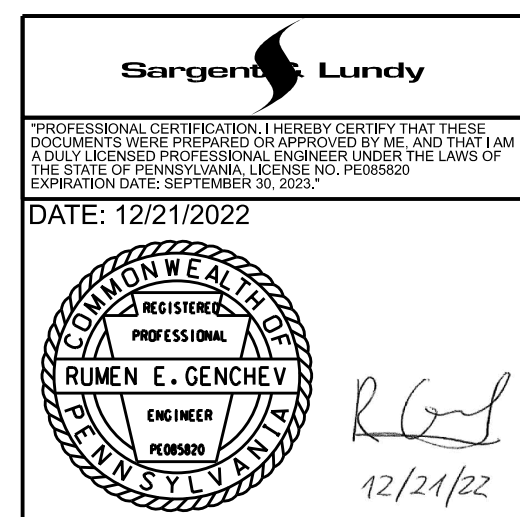
**STR. NO. 1/4 (COX'S CORNER)**  
TYPE DE/1  
ELEV. BOTTOM BASE # 22.5  
HT. BASE # TO COND. 55'  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. C-275207  
OPGW ASS'Y. C-268575

**STR. NO. 1/5**  
TYPE T/1  
ELEV. BOTTOM BASE # 22.0  
HT. BASE # TO COND. 55' (EMILIE) {56' (COX'S)}  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. D-194090 (EMILIE), C-275206 (COX'S)  
OPGW ASS'Y. S-7401 (EMILIE), C-268574 (COX'S CORNER)

**STR. 1/6**  
TYPE T/1  
ELEV. BOTTOM BASE # 19.5  
HT. BASE # TO COND. 55' (EMILIE) {56' (COX'S)}  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. D-194090 (EMILIE), C-275206 (COX'S)  
OPGW ASS'Y. S-7401 (EMILIE), C-268574 (COX'S CORNER)

SPAN 1/1 TO 1/4  
NEAR SIDE COX'S CORNER  
1 - DNO-8338 (0.614 DIA. OPGW 36-FIBER SM)  
MAX. TENSION = 5898 LBS. (22.4% OF ULTIMATE)  
AT 1" ICE, 8 LBS. SQ. FT. WIND 0 F. FINAL TENSION AT 60°F. NO WIND = 1261 LBS.  
3-1622.0 KCM 39/19 ACS/TW/HS COND.  
MAX. TENSION = 11450 LBS./CONDUCTOR  
AT 1" ICE, 8 LBS./SQ. FT., WIND 0 F. FINAL TENSION AT 60°F. NO WIND = 4950 LBS.

**PROFILE VIEW LEGEND**  
—— 220-54 (EMILIE)  
- - - 220-30 (COX'S CORNER)  
NOTE-220-30 DISPLAYED AT MAX OP TEMPERATURE OF 482°F IN CREEP CONDITION



**NOTES**  
1-ALL ELEVATIONS ARE IN REFERENCE TO U.S.C. AND G.S. DATUM - STATIONS TO & SURVEY.  
2-GRADE ELEVATION VARIES LESS THAN ONE FOOT UNLESS INDICATED.

REFERENCE DRAWINGS:  
D-139219-SHEET #2 CROYDON-COX'S CORNER LINE  
D-220393 - CONSTRUCTION LIST

SPAN 1/1 TO 1/4  
FAR SIDE EMILIE  
ALL SPANS  
SPAN 1/4 TO 1/7  
NEAR SIDE AND FAR SIDE  
1 - DNO-8338 (0.614 DIA. OPGW 36-FIBER SM)  
MAX. TENSION = 5908 LBS. (22.5% OF ULTIMATE)  
AT 1" ICE, 8 LBS./SQ. FT. WIND 0 F. FINAL TENSION AT 60°F. NO WIND = 1208 LBS.  
6-1,590,000 CM 54/19 ACSR CONDUCTORS  
MAX. TENSION = 12,500 LBS./SUB CONDUCTOR  
AT 1" ICE, 8 LBS. SQ. FT. WIND 0 F. FINAL TENSION AT 60°F. NO WIND = 4530 LBS.

**SCALE**  
HORIZONTAL 1" = 100'  
VERTICAL 1" = 30'

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
8	12/21/2022	ISSUE FOR CONSTRUCTION			

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
5	12/21/22	EC# 269640 WO# 18286656 ADDED: THIS DRAWING ISSUE FOR CONSTRUCTION BY S&L	M A H	J S G	M J L

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
2	5/30/24	CHGD TITLE AND ADDED SHEET 4 TO 20	R O C		T J T
3	05/25/22	EC #143093 DASHIELL ISSUED FOR AS-BUILT	A G M		
4	11/16/15	EC #172632, W.O. #7849765 DASHIELL ADDED: 220-30 LINE RECONDUCTOR	J M W	C K W	F M

**STRUCTURAL**

PLAN AND PROFILE  
CROYDON - EMILIE  
220-54 LINE

CROYDON TO COX'S CORNER  
PECO Energy Company

SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
-						7-24-73

APPROVED SIGNATURES PER ORIG. APPROVED \_\_\_\_\_

SHEET 2 OF D- 220216-5

5

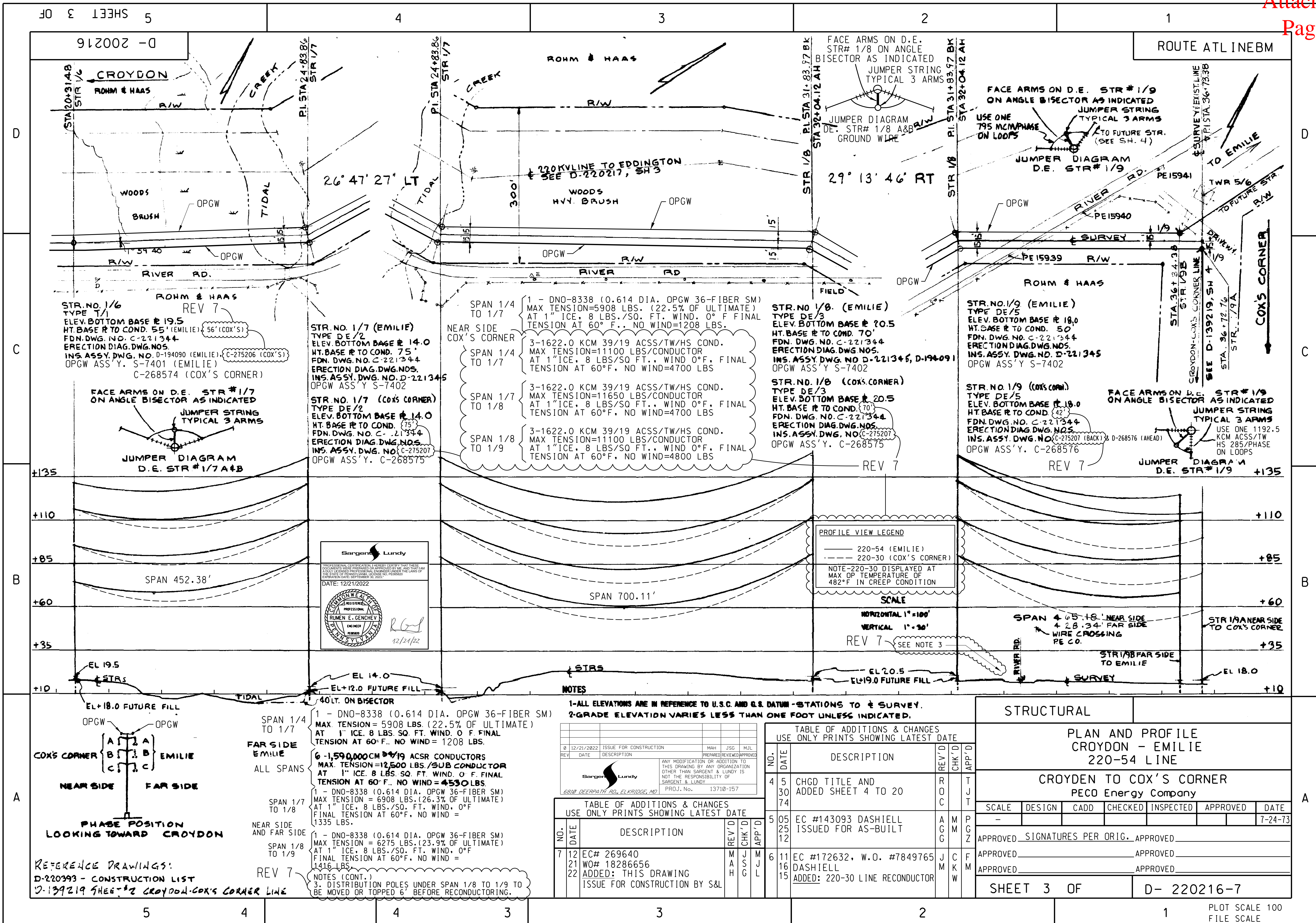
4

3

2

1

PLOT SCALE 100  
FILE SCALE



STR. NO. 1/6  
TYPE T/1  
ELEV. BOTTOM BASE # 19.5  
HT. BASE # TO COND. 55' (EMILIE) 56' (COX'S)  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. D-194090 (EMILIE), C-275206 (COX'S)  
OPGW ASS'Y. S-7401 (EMILIE)  
C-268574 (COX'S CORNER)

STR. NO. 1/7 (EMILIE)  
TYPE DE/2  
ELEV. BOTTOM BASE # 14.0  
HT. BASE # TO COND. 75'  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. D-221345  
OPGW ASS'Y. S-7402

STR. NO. 1/7 (COX'S CORNER)  
TYPE DE/2  
ELEV. BOTTOM BASE # 14.0  
HT. BASE # TO COND. 75'  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. C-275207  
OPGW ASS'Y. C-268575

SPAN 1/4 TO 1/7

SPAN 1/4 TO 1/7

SPAN 1/7 TO 1/8

SPAN 1/8 TO 1/9

1 - DNO-8338 (0.614 DIA. OPGW 36-FIBER SM)  
MAX TENSION=5908 LBS. (22.5% OF ULTIMATE)  
AT 1" ICE, 8 LBS./SQ. FT. WIND, 0° F FINAL TENSION AT 60° F., NO WIND=1208 LBS.

3-1622.0 KCM 39/19 ACSS/TW/HS COND.  
MAX TENSION=11100 LBS/CONDUCTOR  
AT 1" ICE, 8 LBS/SQ FT., WIND 0° F. FINAL TENSION AT 60° F., NO WIND=4700 LBS

3-1622.0 KCM 39/19 ACSS/TW/HS COND.  
MAX TENSION=11650 LBS/CONDUCTOR  
AT 1" ICE, 8 LBS/SQ FT., WIND 0° F. FINAL TENSION AT 60° F., NO WIND=4700 LBS

3-1622.0 KCM 39/19 ACSS/TW/HS COND.  
MAX TENSION=11100 LBS/CONDUCTOR  
AT 1" ICE, 8 LBS/SQ FT., WIND 0° F. FINAL TENSION AT 60° F., NO WIND=4800 LBS

STR. NO 1/8 (EMILIE)  
TYPE DE/3  
ELEV. BOTTOM BASE # 20.5  
HT. BASE # TO COND. 70'  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. D-221345, D-194091  
OPGW ASS'Y S-7402

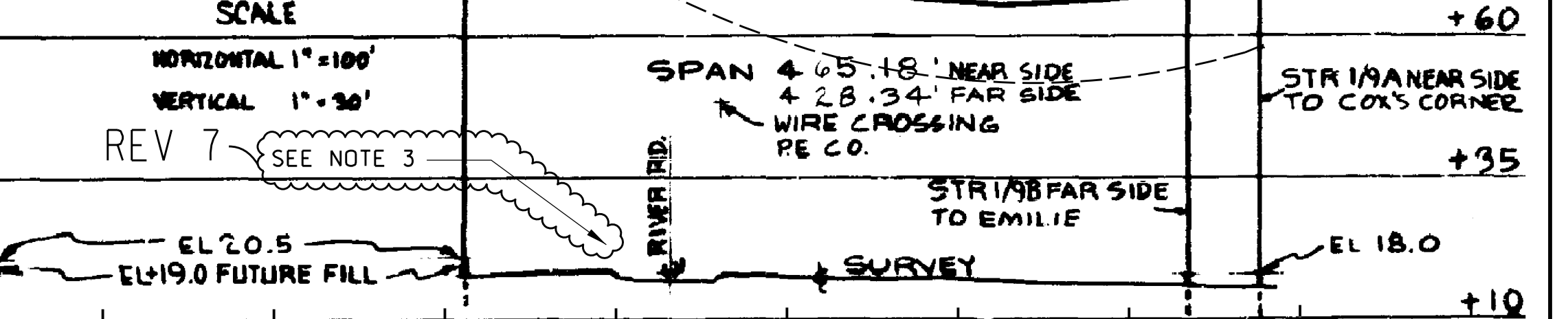
STR. NO. 1/8 (COX'S CORNER)  
TYPE DE/3  
ELEV. BOTTOM BASE # 20.5  
HT. BASE # TO COND. 70'  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. C-275207  
OPGW ASS'Y. C-268575

STR. NO. 1/9 (EMILIE)  
TYPE DE/5  
ELEV. BOTTOM BASE # 18.0  
HT. BASE # TO COND. 50'  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. D-221345  
OPGW ASS'Y S-7402

STR. NO. 1/9 (COX'S CORNER)  
TYPE DE/5  
ELEV. BOTTOM BASE # 18.0  
HT. BASE # TO COND. 50'  
FDN. DWG. NO. C-221344  
ERECTION DIAG. DWG. NOS.  
INS. ASSY. DWG. NO. C-275207 (BACK) & D-268576 (AHEAD)  
OPGW ASS'Y. C-268576

FACE ARMS ON D.E. STR # 1/9 ON ANGLE BISECTOR AS INDICATED  
JUMPER STRING TYPICAL 3 ARMS  
USE ONE 1192.5 KCM ACSS/TW HS 285/PHASE ON LOOPS

PROFILE VIEW LEGEND  
--- 220-54 (EMILIE)  
--- 220-30 (COX'S CORNER)  
NOTE-220-30 DISPLAYED AT MAX OF TEMPERATURE OF 482°F IN CREEP CONDITION  
SCALE  
HORIZONTAL 1"=100'  
VERTICAL 1"=30'  
REV 7 SEE NOTE 3



1 - ALL ELEVATIONS ARE IN REFERENCE TO U.S.C AND G.S DATUM - STATIONS TO SURVEY.  
2 - GRADE ELEVATION VARIES LESS THAN ONE FOOT UNLESS INDICATED.

STR. NO. 1/6 TO 1/7  
MAX TENSION=5908 LBS. (22.5% OF ULTIMATE)  
AT 1" ICE, 8 LBS./SQ. FT. WIND, 0° F FINAL TENSION AT 60° F., NO WIND= 1208 LBS.

6 - 1,590,000 CM 39/19 ACSS CONDUCTORS  
MAX. TENSION=12,500 LBS./SUB CONDUCTOR  
AT 1" ICE, 8 LBS./SQ. FT. WIND, 0° F. FINAL TENSION AT 60° F., NO WIND= 4530 LBS.

1 - DNO-8338 (0.614 DIA. OPGW 36-FIBER SM)  
MAX TENSION= 6275 LBS. (23.9% OF ULTIMATE)  
AT 1" ICE, 8 LBS./SQ. FT. WIND, 0° F FINAL TENSION AT 60° F., NO WIND = 1335 LBS.

1 - DNO-8338 (0.614 DIA. OPGW 36-FIBER SM)  
MAX TENSION = 6275 LBS. (23.9% OF ULTIMATE)  
AT 1" ICE, 8 LBS./SQ. FT. WIND, 0° F FINAL TENSION AT 60° F., NO WIND = 1416 LBS.

NOTES (CONT.)  
3. DISTRIBUTION POLES UNDER SPAN 1/8 TO 1/9 TO BE MOVED OR TOPPED 6" BEFORE RECONDUCTORING.

PHASE POSITION LOOKING TOWARD CROYDON

REFERENCE DRAWINGS:  
D-220393 - CONSTRUCTION LIST  
D-139219 SHEET #2 CROYDON-COX'S CORNER LINE

TABLE OF ADDITIONS & CHANGES USE ONLY PRINTS SHOWING LATEST DATE		TABLE OF ADDITIONS & CHANGES USE ONLY PRINTS SHOWING LATEST DATE			
NO.	DATE	DESCRIPTION	NO.	DATE	DESCRIPTION
0	12/21/2022	ISSUE FOR CONSTRUCTION	4	05	CHGD TITLE AND ADDED SHEET 4 TO 20
1	12/21/2022	ISSUE FOR CONSTRUCTION	5	05	EC #143093 DASHIELL ISSUED FOR AS-BUILT
2	12/21/2022	ISSUE FOR CONSTRUCTION	6	11	EC #172632, W.O. #7849765 DASHIELL ADDED: 220-30 LINE RECONDUCTOR
3	12/21/2022	ISSUE FOR CONSTRUCTION	7	12	EC# 269640 WO# 18286656 ADDED: THIS DRAWING ISSUE FOR CONSTRUCTION BY S&L

STRUCTURAL						
PLAN AND PROFILE CROYDON - EMILIE 220-54 LINE						
CROYDON TO COX'S CORNER PECO Energy Company						
SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
						7-24-73
APPROVED SIGNATURES PER ORIG. APPROVED						
APPROVED _____ APPROVED _____						
APPROVED _____ APPROVED _____						
SHEET 3 OF				D- 220216-7		

### **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](mailto: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.**

The project involves the partial reconductoring of PECO's 220-30 line. The 220-30 line is 1.4 miles long and has a 300' wide right of way. The line will be reconductored from Croydon substation to PECO Structure 1-9, a total of 0.8 miles. The project will utilize existing structures, there will be no new structures or replacements. As discussed in Question 4, below, this project was identified through the PJM Interconnection, LLC ("PJM") Regional Expansion Transmission Plan ("RTEP") process.

The proposed project is located entirely within Bristol Township & Borough, Bucks County, Pennsylvania.

This application is made pursuant to two provisions of 52 Pa Code §57.72(d)(1):

- 52 Pa Code §57.72(d)(1)(i): 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, below, for evidence that this project does not substantially alter the right-of-way.
- 52 Pa Code §57.72(d)(1)(vi): 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 Questions 3, 4, and 12, *infra*, for a description of the partial reconducting.
- 52 Pa Code §57.72(d)(1)(vi): An HV line having a proposed route of 2 miles or less. *Note:* The route of this project work is approximately 0.8 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 220-30 line is operated at 230 kV and is part of the national bulk electric system. The need for this project was identified through PJM's Regional Transmission Expansion Plan ("RTEP") process. The RTEP process consists of annually evaluating the transmission grid to determine necessary system upgrades to address reliability, market efficiency, and operational needs that keep electricity flowing to the millions of people throughout PJM's region. As part of PJM's RTEP analysis of both 1) the generator retirements for Pedricktown and Newark Bay ("2022 Generation Deactivation") and 2) the 2026 RTEP summer evaluation ("2026 Reliability Study"), PJM identified the thermal overload of the Croydon-Burlington line (220-30) for the loss of various system elements. PECO was directed by PJM to reconductor this portion of the 220-30 line.

**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.**
- b) Provide engineering design criteria and parameters such as vertical clearance to ground.**
- c) Provide an explanation as to how the project will be in compliance with the current NES.C and, where applicable, information on how the applicant's design specifications and safety rules may exceed NESC suggested standards for transmission lines**

- a) Provide an analysis of minimum conductor clearances and conductor thermal ratings.

Conductor clearances for the project meet or exceed the requirements 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	22.4'
Roadways, driveways, parking lots	22.4'
Railroads, above top or rail	30.4'
Area not accessible by vehicles	18.4'

- 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 (approximately 300 feet) 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 provided exceeds the requirements of NESC and PECO's Engineering Practice EPP-2090, "OHT Design Clearances" and will provide access for line maintenance, repair, and vegetation management.

- 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.**

The project will utilize existing structures, there will be no new structures or replacements. Reference the below table for existing structures heights.

Structure Number	Existing Structure Height (ft)
0-1	80
1-1	108
1-2	115
1-3	116
1-4	113
1-5	116
1-6	116
1-7	138
1-8	128
1-9	99
6-1	97
6-2	136
6-3	311
6-4	311

- 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.**

Not applicable, the project is utilizing existing structures.

- 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.**

PJM provided a first review of this project at the October 2021 TEAC meeting as part of the Reliability Analysis Update<sup>1</sup> and Deactivation Update<sup>2</sup> and a second review of this project at the November TEAC meeting as part of both the Generation Update<sup>3</sup> and Reliability Update<sup>4</sup>. The PJM project number is b3335.

- 9. Provide a breakdown of project costs. Please explain who will own, finance and build the proposed project.**

PECO estimates the total project cost to be \$1.3 million. \$210,000 of that cost is attributed to materials (new conductor/hardware). The remaining costs are attributable to direct labor – primary engineering and design, clearance reviews, and electrical construction – and allocated PECO overhead and management costs. PECO will own, finance, and build the proposed project.

- 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.

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<sup>1</sup> <https://www.pjm.com/-/media/committees-groups/committees/teac/2021/20211005/20211005-item-09-reliability-analysis-update.ashx>

<sup>2</sup> <https://www.pjm.com/-/media/committees-groups/committees/teac/2021/20211005/20211005-item-02-generation-deactivation-notification-update.ashx>

<sup>3</sup> [20211005-item-02-generation-deactivation-notification-update.ashx \(pjm.com\)](https://www.pjm.com/-/media/committees-groups/committees/teac/2021/20211005/20211005-item-02-generation-deactivation-notification-update.ashx)

<sup>4</sup> [20211005-item-08-reliability-analysis-update.ashx \(pjm.com\)](https://www.pjm.com/-/media/committees-groups/committees/teac/2021/20211005/20211005-item-08-reliability-analysis-update.ashx)

**11. Please provide the anticipated construction commencement date and the proposed in-service date of the project.**

The anticipated construction commencement date is 11/25/2023. The proposed in-service date of the project is 12/16/2023. This project requires a transmission outage. The outage for the reconductoring work is currently scheduled for 11/25/2023 - 12/16/2023.

**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.**

This project involves replacing existing conductor and utilizing existing structures. No alterations to the existing right-of-way are necessary and conductors will remain in a similar location. *See* PECO Attachment 1.

**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, May 3, 2023. 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 the letter of notification, the reconductoring project will proceed 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.**

The proposed project will cross one wetland area. The area is a tributary area to the Delaware River, a stream that is approximately 50 ft wide. This area will be crossed aerially to eliminate ground disturbance within the vicinity of the wetland. Since the wetland crossing is aerial, it is anticipated that a permit and PNDI will not be 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.**

This project involves replacing conductors on one 230kV circuit.

**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).**

This project is being driven by thermal overloads as determined by PJM's Generator Deliverability Study and Deactivation studies for Pedricktown and Newark Bay, which reflect NERC Standard TPL-001-4 — Transmission System Planning Performance Requirements. As noted in response Question 4, above, in 2021 PJM identified the overload of the 220-30 line as part of its RTEP studies relating to the deactivation of Pedricktown and Newark Bay for the 2022 Generation Deactivation Study and the 2026 RTEP Summer evaluation.

**18. Explain why the NERC, or other regulatory standard, violation, is now an issue where it wasn't previously.**

See response to Question 17, above. PJM annually performs its RTEP evaluation; the overload of the 220-30 had not been previously identified.

**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 meets NERC Standard TPL-001-4 criteria and PJM planning criteria as detailed in the PJM Operating Agreement Schedule 14 and applicable Manual 14B.

**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 need for this project is not related to age or condition of existing facilities. The existing conductor and associated facilities are approximately 48 years old. The project will utilize existing structures, there will be no new structures or replacements.

- 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.**

There have been no unplanned outages on the 220-30 line within the last ten 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 alternative 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 220-30 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.**

Not applicable, the 220-30 line has not experienced any outages.

- 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.**

Not applicable, the need for this project is not related to the useful service life of existing facilities.