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AN EXELON COMPANY

Jennedy S. Johnson
Assistant General Counsel
Jennedy.Johnson@exeloncorp.com

Telephone 215.841.4353
Fax 215.568.3389

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

May 16, 2023

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 of PECO Energy Company for Approval for the
Reconductoring of the Croydon-Burlington 220-30 230 kV Transmission Line in
Bucks County, Pennsylvania**

Docket No. A-2023-3040353, Utility Code: 110550

Dear Secretary Chiavetta:

Pursuant to the Commission's May 8, 2023 Secretarial Letter in the above-referenced docket, enclosed please find PECO Energy Company's Responses to the Data Requests of the Bureau of Technical Utility Services.

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,

Jennedy S. Johnson
Enclosures

cc: Jordan Van Order – Email Only (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 PARTIALLY : Docket No. A-2023-3040353
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 *Responses to the Data Requests of the Bureau of Technical Utility Services 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 (OR ELECTRONIC MAIL WHERE INDICATED):

Richard A. Kanaskie, Director & Chief Prosecutor* Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 rkanaskie@pa.gov	Office of Small Business Advocate* 555 Walnut Street 1 st Floor, Forum Place Harrisburg, PA 17101 ra-sba@pa.gov
Patrick M. Cicero, Consumer Advocate* Office of Consumer Advocate 555 Walnut Street 5 th Floor, Forum Place Harrisburg, PA 17101-1923 pcicero@paoca.org	James McMahon, Chairperson Bristol Township Zoning Board 2501 Bath Road Bristol, PA 19007

<p>John A. Greer, III, Chairperson Bristol Township Planning Commission 2501 Bath Road Bristol, PA 19007</p>	<p>Robert McTague, Director* Bristol Township Building & Planning 2501 Bath Road Bristol, PA 19007 rmctague@bristoltownship.org li@bristoltownship.org</p>
<p>Craig Bowen, Council President* Bristol Township Council 2501 Bath Road Bristol, PA 19007 cbowen@bristoltownship.org</p>	<p>Randee Elton, Township Manager* Bristol Township 2501 Bath Road Bristol, PA 19007 relton@bristoltownship.org</p>
<p>Robert J. Harvie, Jr., Board Chair* Bucks County Board of Commissioners Bucks County Administration Bldg. 55 East Court Street Doylestown, PA 18901 CommHarvie@buckscounty.org</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, 5th 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 16, 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

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission

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May 16, 2023

TUS-A-1:

Reference the Letter of Notification, Paragraph 8. Please provide a more detailed description of the scenario under which PJM identified thermal overload. Please also include the percentage of loading with respect to the conductors' emergency rating.

Response:

**THIS RESPONSE IS CONFIDENTIAL AND IS SUBMITTED ONLY IN THE
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TUS-A-2:

Reference the Letter of Notification, Paragraph 9. Please explain why PECO is only reconductoring 0.8 miles of the 1.4-mile-long Croydon-Burlington 220-30 230 kV Transmission Line.

Response:

The 220-30 line currently utilizes two different conductors. The conductor currently in use for the first 0.8 miles out of Croydon (which is the subject of the instant LON) does not have sufficient capacity to meet the new increased loading requirement. The conductor currently in use for the remaining 0.6 miles of the line meets the increased loading requirements and will therefore remain in place.

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TUS-A-3:

Reference the Letter of Notification, Paragraph 11. The project cost estimate is not consistent with the October 5, 2021, PJM TEAC. Please explain.

Response:

PJM requests quarterly project updates on RTEP projects, including but not limited to, engineering progress status, cost estimates, construction updates etc. This process recognizes that cost estimates that are originally provided to PJM are planning-level estimates that will change as the project progresses through design, engineering, and construction. These updates are then publicly posted on PJM's website¹. In its second quarter 2023 project update, PECO provided to PJM the updated total project cost of \$1.3M.

¹ See, PJM Project Status and Cost Allocation Webpage: <https://www.pjm.com/planning/project-construction>. The export function provides a more detailed breakdown of costs, the construction status, and SRRTEP/TEAC presentations corresponding to the RTEP projects.

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TUS-A-4:

Reference the Letter of Notification, Paragraph 16. Please explain whether the new higher capacity conductors result in additional structural loading on the existing transmission structures. Additionally, please explain whether these transmission structures are adequate for any changes in structural loading.

Response:

The new conductor weighs 66 pounds per 1000' more than the existing conductors, and therefore will apply minimal additional load to the existing transmission structures. The new conductors will be installed at a slightly lower maximum tension than existing conductors. The existing transmission structures are adequate for modified loading conditions. As per PECO's response in Attachment 2, Question 5, conductor clearances were verified to meet the requirements of EPP-2090 and NESC 2017.

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TUS-A-5:

Reference the Letter of Notification, Paragraph 26. The description is not consistent with 52 Pa Code § 57.72(d)(1)(i). Please explain.

Response:

There was a transcription error in the portion of Paragraph 26 that summarizes subsection 57.72(d)(1)(i). That first bullet should read:

- 52 Pa Code §57.72(d)(1)(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.** See Attachment 2, PECO answer to Question 12, for evidence that this project does not substantially alter the right-of-way.

For ease of review, the corrected text is in bold. Please note that PECO's statements regarding the applicability of this subsection have not changed.

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TUS-A-6:

Reference the Letter of Notification, Paragraph 26. The description is not consistent with 52 Pa Code § 57.72(d)(1)(vi). Please explain.

Response:

There was a transcription error in the second bullet of Paragraph 26, which is quoting subsection 57.72(d)(1)(v) and not subsection 57.72(d)(1)(vi). That bullet should read:

- 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* Attachment 2, PECO answer to Questions 3, 4, and 12, for a description of the partial reconductoring.

For ease of review, the corrected text is in bold. Note that PECO's statements regarding the applicability of this subsection have not changed.

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May 16, 2023

TUS-A-7:

Reference the Letter of Notification, Attachment, Section 4. Please describe the elements whose loss results in a thermal overload on the Croydon-Burlington line.

Response:

See **CONFIDENTIAL** response to TUS-A-1.

**THE RESPONSE TO TUS-A-1 IS CONFIDENTIAL AND IS SUBMITTED ONLY
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TUS-A-8:

Reference the Letter of Notification, Attachment 2, Section 17. Please state which of the NERC TPL-001-4 categories the thermal overload was identified under (e.g., p1, p2, etc.).

Response:

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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 PECO's Responses to the Bureau of Technical Utility Services' Data Requests, A-1 through A-8, 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: May 16, 2023



Drew T. Davis
Vice President, Transmission and Substation
PECO Energy Company