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February 29, 2024

Via E-Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

RE: PECO Energy Company's Electric Asset Optimization Plan Docket No. P-2020-3020974

Dear Ms. Chiavetta:

Enclosed for filing in the above referenced matter is PECO Energy Company's Electric Annual Asset Optimization Plan.

If you have any questions regarding this filing, please do not hesitate to contact me at 215-841-5777.

Sincerely,

cc: Parties of Record

PECO ENERGY COMPANY

ANNUAL ASSET OPTIMIZATION PLAN FOR 2023 - ELECTRIC OPERATIONS

Docket No. P-2020-3020974

PECO ENERGY COMPANY
ANNUAL ASSET OPTIMIZATION PLAN FOR 2023 - ELECTRIC
Docket No. P-2020-3020974

I. INTRODUCTION

On February 14, 2012, Governor Corbett signed into law Act 11 of 2012 (“Act 11”), which amended the Pennsylvania Public Utility Code in several respects, including the addition of Subchapter B (66 Pa. C.S. §§ 1350-1360). Act 11 authorized the Pennsylvania Public Utility Commission (“PUC” or “Commission”) to approve a distribution system improvement charge (“DSIC”) upon petition by an electric distribution company, a natural gas distribution company, a water utility, or a wastewater utility. A DSIC authorizes a utility to recover the reasonable and prudent costs incurred to repair, improve, or replace eligible property that is part of the utility’s distribution system. The DSIC allows utilities to recover the costs of DSIC-eligible property that is placed in service between base rate cases and, therefore, is not included in the existing revenue requirement being recovered in the utility’s base rates.

In addition, Subchapter B sets forth various requirements that must be satisfied by a qualifying utility in order to establish a DSIC and to recover the reasonable and prudent costs to repair, improve or replace eligible property.

On August 2, 2012, the Commission entered its *Final Implementation Order in Implementation of Act 11 of 2012* at Docket No. M-2012-2293611 (“Implementation Order”). The Implementation Order sets forth the Commission's expectations with regard to: 1) a Long Term Infrastructure Improvement Plan (“LTIIIP”), which must be filed as a precursor to a request to establish a DSIC (66 Pa.C.S. § 1352); and 2) Annual Asset Optimization Plans (“AAO Plans”

or “AAOP”), which must be filed each year by a utility that has an approved DSIC and LTIP (66 Pa.C.S. § 1356).

According to the Implementation Order, AAO Plans are intended to provide an overall status report regarding a utility's progress in making infrastructure improvements pursuant to a Commission-approved LTIP (Implementation Order at 30). AAO Plans are expected to: 1) demonstrate LTIP compliance and progress; and 2) identify a utility's near-term construction projects that will be funded by the DSIC, consistent with the LTIP.

On May 22, 2014, 52 Pa. Code Section 121.6 was adopted, which requires AAO Plan elements to include: (1) a description of all eligible property repaired, improved and replaced in the immediately preceding 12-month period pursuant to the utility's LTIP; and (2) a detailed description of all the facilities to be improved in the upcoming 12 months.

II. PECO’s Electric LTIP

A. LTIP I (2016-2020)

On March 27, 2015, PECO filed for *Approval of its Electric Long Term Infrastructure Improvement Plan and to Establish a Distribution System Improvement Charge for its Electric Operations* at Docket No. P-2015-2471423. PECO’s LTIP was a five-year plan spanning the years 2016-2020. It was designed to accelerate infrastructure improvements in order to enhance system resiliency and reliability. The plan consisted of three main project areas and a fourth category related to unreimbursed facility relocations: 1) Storm Hardening and Resiliency Measures; 2) Underground Cable Replacements; 3) Building Substation Retirements; and 4) Facility Relocations. During the 5-year LTIP period, PECO’s increased expenditures were anticipated to amount to \$324.3 million, with \$274.3 million for the above reliability projects and \$50 million for facility relocation work as permitted by 66 Pa. C.S. Section 1351 (definition

of “eligible property”). On October 22, 2015, the PUC approved PECO’s electric LTIIIP and DSIC petition.¹ PECO’s LTIIIP I plan ended on December 31, 2020.

B. LTIIIP II (2021-2025)

On July 22, 2020, PECO filed for *Approval of its [Second] Electric Long Term Infrastructure Improvement Plan* at Docket No. P-2020-3020974 (“LTIIIP II”). PECO’s LTIIIP II is a five-year plan spanning the years 2021-2025. It is designed to accelerate infrastructure improvements in order to enhance system resiliency and reliability. The plan consists of three main project areas and a fourth category related to unreimbursed facility relocations: 1) Storm Hardening and Resiliency; 2) Underground Cable Replacements; 3) Substation Switchgear Replacement; and 4) Facility Relocations. During the five-year LTIIIP II period, PECO’s increased expenditures are estimated to be \$1.44 billion, with \$1.36 billion for the above reliability projects and \$75 million for facility relocation work. On November 19, 2020, the PUC approved PECO’s electric LTIIIP II Plan.

PECO hereby provides its AAO Plan for 2023 and is filing copies of this AAO Plan with the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and other interested parties in Docket No. P-2020-3020974.

¹ The DSIC was approved subject to two issues referred to the Office of Administrative Law Judge for hearing: 1) whether the DSIC should apply to transmission voltage rates; and 2) what revenues associated with PECO’s tariff riders should be recovered through the DSIC. (See the Commission’s Opinion and Order, issued October 22, 2015, in Docket No. P-2015-2471423). On September 21, 2017, the Commission approved the Joint Petition for Settlement, which resolved the issues described above.

III. REQUIRED ELEMENTS OF THE AAO PLAN

A. Description of all Eligible Property Repaired, Improved, and Replaced in the Immediately Preceding 12-Month Period Pursuant to PECO's LTIIIP II

Exhibit A² attached hereto provides summary data with respect to projects that were completed in LTIIIP II year 2023 for: 1) Storm Hardening and Resiliency Programs, 2) Underground Cable Replacement Programs, 3) Switchgear Replacement Program, and 4) Facility Relocations (as specified below). In 2023, PECO spent approximately \$177.4 million on the LTIIIP II program areas described below compared to \$294.8 million estimated in the LTIIIP II for 2023 (excluding Facility Relocations), which included execution of all 2023 projects, as well as substantial efforts to continue engineering and construction on planned 2024 electric LTIIIP II projects – primarily for Building Substation and the Switchgear Replacement Programs. PECO met or exceeded its 2023 scope commitments for the majority of planned LTIIIP II work categories (i.e., Customers Experiencing Multiple Interruptions (“CEMI”) Areas, CEMI Targeted Circuits, Aerial Infrastructure Resiliency (“AIR”) Areas, AIR Targeted Assets, Circuit Rebuilds Enabling Unit Substation Retirements, and URD cable replacements). PECO experienced material delays and permitting issues which impacted the Main Stem cable replacement program. For example, cable manufacturers could not keep up with our typical supply orders coming out of the pandemic. As a result, PECO did not meet the scope commitment as outlined in the LTIIIP II target.

Additionally, the programs outlined within LTIIIP II have supported and increased job opportunities within Southeastern Pennsylvania. The following equivalent full-time employees and contracting resources gained employment due to LTIIIP II Programs:

² Exhibit A also details estimated LTIIIP II spend in 2024.

	PECO Equivalent Full-Time Employees	Equivalent Full-Time Contracting Resources
1/1/2021 – 12/31/2021	46	140
1/1/2022 – 12/31/2022	67	184
1/1/2023 – 12/31/2023	65	159

1. Storm Hardening and Resiliency Programs

a. Customers Experiencing Multiple Interruptions (“CEMI”) Programs

i. CEMI Areas

As shown in Exhibit A, PECO met its 2023 LTIP II goals for CEMI Areas. The LTIP II estimated that PECO would complete between eight and thirteen CEMI Areas projects and actual results were ten. The CEMI Areas projects were completed in the following locations:

County	Number of Projects
Bucks	3
Chester	4
Delaware	1
Montgomery	2

The projects reduced the impact of storm conditions in these counties and involved: 1) replacing open wire and self-supporting cable installations with three-phase and single-phase spacer cable installations; 2) conversion and retirement of obsolete equipment; and 3) extending 34kV and 13kV facilities to create sectionalizing loops. In addition, PECO began preliminary CEMI Areas work planned for 2024 (i.e., detailed project design, vegetation management, and preliminary construction) in Bucks, Chester, Delaware, Montgomery, and York counties. In 2023, PECO spent \$7.1 million on these CEMI Areas projects compared to the \$13.5 million estimated in the LTIP II.

ii. CEMI Targeted Circuits

As shown in Exhibit A, PECO met its 2023 LTIP II goals for CEMI Targeted Circuits. The LTIP II estimated that PECO would complete three to four CEMI Targeted Circuits projects and actual results were three. The CEMI Targeted Circuits projects were completed in the following locations:

County	Number of Projects
Chester	1
Montgomery	1
Philadelphia	1

The projects reduced the impact of storm conditions in these counties and involved: 1) installing sectionalizing devices; and 2) installing tree-resistant wire in heavily vegetated areas. Additionally, PECO began preliminary CEMI Targeted Circuits work planned for 2024 (i.e., detailed project design, vegetation management and preliminary construction) in Bucks, Chester, and Delaware counties. In 2023, PECO spent \$7.4 million on these CEMI Targeted Circuits projects compared to the \$6.7 million estimated in the LTIP II.

b. Aerial Infrastructure Resiliency (“AIR”) Programs

i. AIR Areas

As shown in Exhibit A, PECO met its 2023 LTIP II goals for AIR Areas. The LTIP II estimated that PECO would complete between two and five AIR Areas projects and actual results were five. The AIR Areas projects were completed in the following locations:

County	Number of Projects
Chester	1
Delaware	1
Montgomery	2
Philadelphia	1

The projects reduced the impact of storm conditions in these counties and involved crossarms, poles, insulators, connectors, and cutouts.³ The replaced aging infrastructure is designed to withstand wind and ice loading consistent with the Grade B construction guidelines defined by the National Electric Safety Code. Additionally, PECO began preliminary AIR Areas work planned for 2024 (i.e., detailed project design, vegetation management, and preliminary construction) in, Chester, Delaware, and York counties. In 2023, PECO spent \$6.8 million on these AIR Areas projects compared to the \$5.1 million estimated in the LTIIIP II.

ii. AIR Targeted Assets

As shown in Exhibit A, PECO met its 2023 LTIIIP II goals for AIR Targeted Assets. The LTIIIP II estimated that PECO would replace between 6,600 and 7,600 assets and actual results were 7,108 assets.⁴ The AIR Targeted Assets replacements were completed in the following locations:

County	Number of Assets Replaced
Bucks	655
Chester	1,366
Delaware	1,058
Montgomery	1,332
Philadelphia	2,573
York	124

The projects reduced the impact of storm conditions in these counties and involved replacing poles, overhead conductors, cross-arms, insulators, connectors, switches, and cutouts. Additionally, PECO began preliminary AIR Targeted Assets work planned for 2024 (i.e.,

³ A cutout is a combination of a fuse and switch used to protect overhead primary power feeder lines and taps from surges and overloads.

⁴ The annual asset ranges initially filed with PECO’s LTIIIP II Plan were based on the number of poles. Consistent with the 2021 AAOP, the Company included qualifying aerial infrastructure as part of the asset count and will continue this practice in future AAOPs.

detailed project design, vegetation management, and preliminary construction) in Bucks, Chester, Delaware, Montgomery, Philadelphia, and York counties. In 2023, PECO spent \$20.0 million on these AIR Targeted Assets replacements compared to the \$71.0 million estimated in the LTIIIP II.

iii. Building Substation Retirement

As part of the electric LTIIIP II, PECO has committed to accelerating the retirement of obsolete building substations and all associated equipment operating at 4kV. In 2023, construction continued the retirement of the Upper Darby 4kV Substation in Delaware County. This multi-year project will convert all 4kV infrastructure served out of Upper Darby Substation to 13kV, supported by a combination of new and existing circuits. In 2024, the Upper Darby 4kV Substation will be retired and infrastructure will operate at 13kV. In 2023, PECO also finalized conceptual design and detailed engineering designs for Overbrook 4kV Substation in Philadelphia County. Additionally, PECO performed the environmental review and testing, procured long-lead materials, and started vegetation management and underground civil construction for Overbrook 4kV Substation. In 2024, PECO will continue civil construction and begin aerial conversion work for Overbrook 4kV Substation. Overall reliability will be improved by creating new 13kV circuit breakdowns, installing new reclosers, and retiring obsolete equipment. In 2023, PECO spent \$9.9 million on Building Substation Retirements compared to the \$14.0 million estimated in the LTIIIP II.

iv. Circuit Rebuild Enabling Unit Substation Retirements

As shown in Exhibit A, PECO met its LTIIIP II goal for Circuit Rebuild Enabling Unit Substation Retirements. The LTIIIP II estimated that PECO would rebuild eight to ten circuits

supplied by Unit Substations and actual results were nine. The retirements were completed in the following locations:

County	Number of Units Retired
Chester	1
Montgomery	3
Philadelphia	5

The associated circuits with these substations were rebuilt and converted to 13kV or 34 kV. Additionally, PECO began substantial preliminary Circuit Rebuild work for 2024 (i.e., detailed project design, vegetation management, civil construction, and electrical construction) in Chester, Delaware, Montgomery, and Philadelphia counties. In 2023, PECO spent \$30.7 million for all Circuit Rebuild work compared to the \$46.0 million estimated in the LTIIIP II.

2. Underground Cable Replacement Programs

a. Main Stem Cable Replacements

Due to supply chain delays and permitting issues, PECO did not meet its LTIIIP II goal for Main Stem cable replacements for LTIIIP II year 2023. The LTIIIP II estimated that PECO would replace between 38 and 48 miles of Main Stem cable and actual results were 11.8 miles.

Main Stem cable was replaced in the following locations:

County	Miles Replaced
Delaware	8.6
Montgomery	1.3
Philadelphia	1.9

Additionally, PECO began preliminary Main Stem work planned for 2024 (i.e., detailed project design, material procurements, and preliminary construction) in Bucks, Chester,

Delaware, Montgomery, and Philadelphia counties. For 2023, PECO spent \$24.2 million on its Main Stem cable replacements compared to the \$43.0 million estimated in the LTIIIP II.

b. Underground Residential Development Cable Replacements

As shown in Exhibit A, PECO met its 2023 LTIIIP II goal for URD cable replacements. The LTIIIP II estimated that PECO would replace 155 to 175 miles of URD cable and actual results were 155.9 miles. URD cable replacements occurred in the following locations:

County	Miles Replaced
Bucks	54.9
Chester	24.0
Delaware	23.2
Montgomery	35.4
Philadelphia	18.4

PECO also began URD work planned for 2024 (i.e., detailed project design and preliminary construction) in Chester, Delaware, Bucks, Montgomery, and Philadelphia counties. In 2023, PECO spent \$62.6 million on URD cable replacements compared to the \$87.0 million estimated in the LTIIIP II.

3. Switchgear Replacement Program

In 2023, PECO estimated that it would spend \$8.5 million in its Substation Switchgear Replacement Program to start construction for switchgear and transformer replacement. PECO spent \$8.7 million to begin construction for the switchgear and transformer replacement. In 2024, PECO plans to complete construction of the switchgear and transformer replacement.

4. Facility Relocation

Facility Relocations involve unreimbursed costs related to highway relocation projects that are eligible for recovery under 66 Pa.C.S. Sections 1351 and 1353. These costs arise when PECO moves its facilities at the direction of the State, Municipality, or other Governmental

Agency performing public or roadway improvement projects within its Right of Way. Because these projects are reactive in nature, PECO's LTIIIP II did not include a projected number of relocations. PECO continued design efforts and the relocation of its facilities in support of PennDOT's improvements along State Route 2025 (approximately \$0.2 million) in Bucks County; State Route 1 (approximately \$0.7 million) in Chester County; State Route 322 (approximately \$0.2 million) in Delaware County; and the I-95 corridor (approximately \$8.7 million) and State Route 3010 (approximately \$0.8 million) through the Philadelphia area. Approximately \$5.4 million was spent on smaller type PennDOT and Municipal projects throughout PECO's service territory.

In 2023, PECO spent \$16.0 million on Facility Relocations compared to the \$15.0 million estimated in the LTIIIP II filing (and the \$11.5 million estimated based on projects scheduled at the time of the filing of the prior year's AAOP).

B. Description of the Facilities to be Improved in the Upcoming 12-Month Period (2024)

PECO expects to meet or exceed its LTIIIP II goals/targets for 2024 (as specified below and in Exhibit A) apart from the Mainstem Cable Replacement Program. As filed, PECO estimated a total of approximately \$309.9 million for LTIIIP II projects in 2024. From an overall financial perspective, PECO now estimates that it will spend approximately \$272.4 million on the following LTIIIP II projects in 2024.

1. Storm Hardening and Resiliency Programs

a. Customers Experiencing Multiple Interruptions ("CEMI") Programs

i. CEMI Areas

PECO expects that it will meet or exceed its goal to complete between 8 and 13 CEMI Areas projects in 2024, with an LTIIIP II-filed amount of \$13.5 million and at an estimated cost

of \$15.4 million. The majority of the 2024 CEMI Areas projects will be in Bucks, Chester, Delaware, and Montgomery counties. These projects will focus on 4kV to 13kV or 34kV conversions, spacer cable, tree wire installations, and Hendrix installations.

ii. CEMI Targeted Circuits

PECO expects that it will meet or exceed its goal to complete between 3 and 4 CEMI Targeted Circuits projects in 2024, with an LTIP II-filed amount of \$7.2 million and at an estimated cost of \$9.2 million. The 2024 CEMI Targeted Circuits projects will be in Bucks, Chester, and Delaware counties. These projects will focus on spacer cable, main cable installations, and sectionalizing existing circuits.

b. Aerial Infrastructure Resiliency (“AIR”) Programs

i. AIR Areas

PECO expects that it will meet or exceed its goal to complete between 2 and 5 AIR Areas projects in 2024, with an LTIP II-filed amount of \$5.2 million and an estimated cost of \$5.2 million. The 2024 AIR Areas projects will be in Bucks, Chester, Delaware, Montgomery, and Philadelphia counties. These projects will focus on the replacement of aerial infrastructure, including poles, overhead conductors, cross-arms, insulators, connectors, and cutouts in areas served by one or more circuits.

ii. AIR Targeted Assets

PECO expects that it will meet or exceed its goal to complete between 6,600 and 7,600⁵ AIR Targeted Assets replacements in 2024, with an LTIP II-filed amount of \$71.0 million and at an estimated cost of \$23.9 million. The 2024 AIR Targeted Assets are focused across the entire PECO service territory. The asset replacements focus on aerial infrastructure, including

⁵ See footnote 4, *infra*.

poles, overhead conductors, cross-arms, insulators, connectors, switches, and cutouts. As PECO has updated its AIR Targeted Assets program to account for equipment beyond poles, it anticipates meeting or exceeding its unit goal at the lower estimated budget.

iii. Building Substation Retirement

PECO will continue to develop engineering plans for, and continue construction on, the multi-year Upper Darby Building Substation and Overbrook Building Substation projects in 2024, with an LTIP II-filed amount of \$14.0 million and at an estimated cost of approximately \$27.2 million. All construction is projected to complete for Upper Darby Building Substation in 2024 as outlined in the LTIP II filing. For Overbrook Building Substation, PECO will continue finalizing conceptual and detailed engineering designs, environmental review and testing, long-lead material procurements, vegetation management, and underground civil construction. Additionally, this work will include underground and overhead electrical construction in 2024.

iv. Circuit Rebuild Enabling Unit Substation Retirements

PECO expects that it will meet or exceed its goal to retire between 8 and 10 Unit Substations and rebuild the associated circuits (i.e., obsolete 4 kV circuits) in 2024, with an LTIP II-filed amount of \$46.0 million and at an estimated cost of \$41.6 million. These projects will be in Chester, Delaware, Montgomery, and Philadelphia counties.

2. Underground Cable Replacement

a. Main Stem Cable Replacements

Due to ongoing supply chain issues, PECO anticipates continuing Main Stem cable replacement challenges in 2024. PECO plans to replace 20 – 30 miles of Main Stem cable in lieu of the LTIP II-filed amount of 38 – 48 miles. This program had an LTIP II-filed amount of

\$43.0 million, and PECO now projects \$30.1 million in spend in 2024.⁶ PECO will rebuild Main Stem primary and secondary infrastructure in Chester, Delaware, Montgomery, and Philadelphia counties.

In its LTIIIP II filing, the Company identified that potential business operation disruptions for manufacturers of distribution equipment could compromise the manufacturing and delivery supply chain for materials needed to complete PECO's capital improvement projects. As a result of supply chain delays, Main Stem cable has experienced a significant increase in lead time. The Company continues to leverage existing relationships and monitor the ongoing supply chain issues.

b. Underground Residential Development ("URD") Cable Replacements

PECO expects that it will meet or exceed its goal to replace between 160 and 180 miles of URD cable in 2024, with an LTIIIP II-filed amount of \$90.0 million and at an estimated cost of \$69.3 million⁷. PECO will upgrade URD systems in Bucks, Chester, Delaware, Montgomery, and Philadelphia counties.

3. Switchgear Replacement Program

PECO's LTIIIP II-filed amount was \$5.0 million, and the Company estimates that it will spend \$19.9 million in 2024 for the Substation Switchgear Replacement Program to complete construction for the 2 – 3 switchgear busses to be replaced in the LTIIIP II plan.

⁶ PECO has reviewed and updated the unit cost for both the Main Stem Cable Replacement and Underground Residential Development ("URD") Cable Replacement programs since the analysis performed and outlined in the LTIIIP II Filing.

⁷ See footnote 6, *infra*.

4. Facility Relocation

For 2024, PECO's LTIP II-filed amount was \$15 million, and the Company estimates that it will spend \$30.6 million on Facility Relocations based on currently scheduled projects. A few key projects areas anticipated to begin or continue construction in 2024 are the I-95 corridor (approximately \$8.0M), Ridge Pike in Montgomery County (approximately \$3.6M), and SR 3010 – Market Street Bridge (approximately \$2.9M).

EXHIBIT A

LTIP II

<i>Million \$</i>	<i>2023 LTIP</i>	<i>2023 Actual</i>	<i>2024 LTIP</i>	<i>2024 Forecast</i>
Customers Experiencing Multiple Interruptions (CEMI) Areas	\$13.5	\$7.1	\$13.5	\$15.4
Customers Experiencing Multiple Interruptions (CEMI) Targeted Circuits	\$6.7	\$7.4	\$7.2	\$9.2
Aerial Infrastructure Resiliency Areas	\$5.1	\$6.8	\$5.2	\$5.2
Aerial Infrastructure Resiliency Targeted Assets	\$71.0	\$20.0	\$71.0	\$23.9
Building Substation Retirement	\$14.0	\$9.9	\$14.0	\$27.2
Circuit Rebuild for Unit Substation Retirements	\$46.0	\$30.7	\$46.0	\$41.6
Main Stem Cable	\$43.0	\$24.2	\$43.0	\$30.1
URD Cable	\$87.0	\$62.6	\$90.0	\$69.3
Switchgear Replacement Program	\$8.5	\$8.7	\$5.0	\$19.9
Facility Relocation*	\$15.0	\$16.0	\$15.0	\$30.6
Total	\$309.8	\$193.4	\$309.9	\$272.4

<i>Units</i>	<i>2023 LTIP</i>	<i>2023 Actual</i>	<i>2024 LTIP</i>	<i>2024 Forecast</i>
Customers Experiencing Multiple Interruptions (CEMI) Areas (Projects)	8 – 13	10	8 – 13	8 – 13
Customers Experiencing Multiple Interruptions (CEMI) Targeted Circuits (Projects)	3 – 4	3	3 – 4	3 – 4
Aerial Infrastructure Resiliency Areas (Projects)	2 – 5	5	2 – 5	2 – 5
Aerial Infrastructure Resiliency Targeted Assets (Assets)	6,600-7,600	7,108	6,600-7,600	7,200 – 8,200
Building Substation Retirement	0	0	1	1
Circuit Rebuild for Unit Substation Retirements (Units)	8 – 10	9	8 – 10	8 – 10
Main Stem Cable (Miles)	38 – 48	11.8	38 – 48	20 – 30
URD Cable (Miles)	155 – 175	155.9	160 – 180	160 – 180
Switchgear Replacement Program	0	0	2 – 3	2 – 3
Facility Relocation	0	0	0	0

VERIFICATION

I, Brian Crowe, hereby declare that I am Vice President Technical Services for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. § 4904 pertaining to false statements to authorities.

Date: February 29, 2024



Brian Crowe
Vice President Technical Services

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF :
ITS ELECTRIC LONG TERM : Docket No. P-2020-3020974
INFRASTRUCTURE :
IMPROVEMENT PLAN :

CERTIFICATE OF SERVICE

I certify and affirm that I have this day served a copy of the *2023 Annual Asset Optimization Plan relating to PECO Energy Company's Electric Long Term Infrastructure Improvement Plan*, in the above-referenced docket, on the following persons in the matter specified with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

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Dated: February 29, 2024

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