



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE  
REFER TO OUR FILE

November 8, 2024

Docket No.: M-2009-2094773  
Utility Code: 110550

RICHARD G. WEBSTER, JR.  
VICE PRESIDENT REGULATORY POLICY & STRATEGY  
PECO ENERGY COMPANY  
2301 MARKET STREET-S15  
PHILADELPHIA, PA 19103  
[dick.webster@peco-energy.com](mailto:dick.webster@peco-energy.com)

RE: PECO Energy Company Biennial Inspection, Maintenance, Repair and  
Replacement Plan for the period of January 1, 2026 through December 31, 2027

Dear Mr. Webster:

On September 27, 2024, PECO Energy Company (PECO) filed its Biennial Inspection, Maintenance, Repair and Replacement Plan (I & M Plan) for the period of January 1, 2026 through December 31, 2027. The Commission is seeking additional information regarding PECO's approved exemption permitting PECO to continue visually inspecting above-ground pad-mounted transformers as often as every eight years, rather than as often as every five years per the current regulation. To assist the Commission in conducting the review of PECO's I & M Plan, please respond with the information requested in Attachment 1.

Please forward the information to the Secretary of the Commission **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilng with the Secretary of the Commission by opening an efilng account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilng system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street

Harrisburg, PA 17120

**Your answers should be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

*I, [print name of appropriate company representative], hereby state that the facts above set forth 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 made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).*

Signature \_\_\_\_\_  
Title \_\_\_\_\_  
Date \_\_\_\_\_

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials "CONFIDENTIAL" in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of your response to John Van Zant in the Reliability and Emergency Preparedness Section of the Bureau of Technical Utility Services via e-mail at [jvanzant@pa.gov](mailto:jvanzant@pa.gov). Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta  
Secretary

Enclosure: Attachment 1

cc: Kriss Brown, LAW  
Dan Searfoorce, TUS  
John Van Zant, TUS  
Brent Killian, BIE  
Patrick M. Cicero, OCA  
NazArah Sabree, OSBA  
Nicole Levine, PECO, [Nicole.Levine@exeloncorp.com](mailto:Nicole.Levine@exeloncorp.com)

Attachment 1  
TUS Data Request 1  
PECO Energy Company Biennial Inspection, Maintenance, Repair and  
Replacement Plan for the period of January 1, 2026 through December 31, 2027  
Docket No. M-2009-2094773

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

1. Reference PECO's I & M Plan, approved exemption permitting PECO to continue visually inspecting above-ground pad-mounted transformers.
  - a. PECO's deviation for visually inspecting above-ground, pad-mount transformers, as often as every eight years, rather than as often as every five years per the current regulation, appears to allow that some equipment may not be visually inspected for eight years.

Given 1.a., above, and given that above-ground, pad-mount transformers are easily accessible by the public, describe how PECO's requested deviation complies with the intent of the National Electric Safety Code, which requires equipment to be inspected on some periodic basis to ensure the safety of the public.