



pecoSM

AN EXELON COMPANY

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PECO
2301 Market Street
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November 22, 2024

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

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

Dear Secretary Chiavetta:

Pursuant to the Commission's November 8, 2024 Secretarial Letter in the above-referenced docket, enclosed please find PECO Energy Company's (PECO's) Response to the Data Request of the Bureau of Technical Utility Services.

Thank you for your assistance in this matter and please direct any questions regarding the above to Richard G. Webster, Jr. at (215) 841-5777 or via email: dick.webster@peco-energy.com.

Sincerely,

Richard G. Webster, Jr

Enclosures

CC: Kriss Brown, Law Bureau
Dan Searfoorce, Bureau of Technical Utility Services
John Van Zant, Bureau of Technical Utility Services
Brent Killian, Bureau of Investigation and Enforcement
Patrick M. Cicero, Office of Consumer Advocate
NazArah Sabree, Office of Small Business Advocate
Nicole Levin, PECO

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO ENERGY COMPANY – :
BIENNIAL INSPECTION, : **Docket No. M-2009-2094773**
MAINTENANCE, REPAIR AND :
REPLACEMENT PLAN FOR THE :
PERIOD OF JANUARY 1, 2026 :
THROUGH DECEMBER 31, 2027 :

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of **PECO Energy Company’s Responses to the Data Request of the Commission’s Bureau of Technical Utility Services** on the persons listed below, in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

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Dated: November 22, 2024

PECO Energy Company

Docket No. M-2009-2094773

Biennial Inspection, Maintenance, Repair and Replacement Plan
for the period of January 1, 2026 through December 31, 2027

Response of PECO Energy Company
To Interrogatories of the
Pennsylvania Public Utility Commission

Response Date: November 22, 2024

TUS-1

Reference PECO's I & M Plan, approved exemption permitting PECO to continue visually inspecting above-ground pad-mounted transformers.

1. 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.

RESPONSE

Provided by Nicole Levine, Senior Vice-President and Chief Operating Officer, PECO

Section 120A of the NESC pertaining to "General Requirements" states the following:

"All electric equipment shall be constructed, installed, and maintained so as to safeguard personnel as far as practical."

Additionally, Section 121A of the NESC pertaining to inspections of "In-Service Equipment" requires the following:

"Electric equipment shall be inspected and maintained at such intervals as experience has shown to be necessary. Equipment or wiring found to be defective shall be put in good order or permanently disconnected."

PECO's change from a five-year inspection cycle to an eight-year inspection cycle continues to comply with the above National Electric Safety Code requirements and the stated intent of the NESC.

PECO’s current inspections meet the PUC requirement in **Section 57.198(n)(6)** requiring checks for rust, dents or other evidence of contact, leaking oil, installation of fences or shrubbery that could adversely affect access to and operation of the transformer, and unauthorized excavation or changes in grade near the transformer. PECO additionally checks for stray voltage using a contact voltage test.

PECO originally requested this exemption in 2018 as part of its I & M Plan for the period of January 1, 2020 through December 31, 2021, and requested continuation of that exemption in subsequent plans. This request was, and remains, consistent with the overall baseline standard for above-ground pad-mount inspections across all of Exelon’s operating companies, based on Exelon’s collective experience.

The PUC granted PECO’s subsequent requests for periods through December 31, 2025, and PECO has been inspecting pad-mounted transformers on an eight-year cycle since 2020.

PECO previously justified its original exemption request based in part of historically low defect find rates. In PECO’s experience, defect rates (less stickers) have remained at a reasonably low level since that time. In summary, the average defect rate during 5-year inspection cycles from 2017 through 2019 was 4.79%, while the average defect rate during 8-year inspection cycles from 2020 through 2024 was 3.61%.

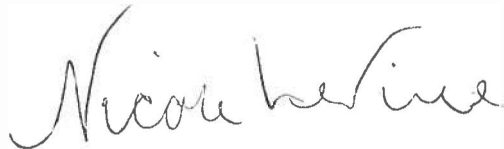
Year	Inspection Frequency	Total Inspections	Defects	% Defects
2017	5Y	9,816	627	6.39%
2018	5Y	9,986	67	0.67%
2019	5Y	9,863	728	7.38%
2020	8Y	6,797	251	3.69%
2021	8Y	7,636	173	2.27%
2022	8Y	6,301	176	2.79%
2023	8Y	6,926	381	5.50%
2024	8Y	4,291	174	4.05%
Total				
		61,616	2,577	4.18%
5Y Freq Total				
		29,665	1,422	4.79%
8Y Freq Total				
		31,951	1,155	3.61%

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

VERIFICATION

I, Nicole L. Levine, hereby state that the facts set forth in PECO's Response to the Bureau of Technical Utility Services' Data Request, TUS-1 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 unsworn falsification to authorities).

Date: November 22, 2024

A handwritten signature in black ink that reads "Nicole Levine". The signature is written in a cursive style with a large initial "N".

Nicole L. Levine
Senior Vice President and Chief Operating Officer
PECO Energy Company