



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

IN REPLY PLEASE
REFER TO OUR FILE

November 26, 2024

Docket No.: M-2009-2094773
Utility Code: 111100

RICHARD G. WEBSTER, JR.
VICE PRESIDENT REGULATORY POLICY & STRATEGY
PECO ENERGY COMPANY
2301 MARKET STREET-S15
PHILADELPHIA, PA 19103
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. On November 8, 2024, via Secretarial Letter the Commission sent PECO a Data Request (Request) 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. On November 22, 2024, PECO responded to the Request. 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 efilings with the Secretary of the Commission by opening an efilings account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings 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. 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

Attachment 1
TUS Data Request 2
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 November 22, 2024, response to TUS Data Request 1.
 - a. Describe how PECO determines the above-ground, padmount distribution transformers to be inspected each year.
 - b. Explain what conditions constitute "defects" as described for PECO's above-ground, padmount distribution transformer inspections.
 - c. Reference the table provided by PECO that detailed the above-ground padmount distribution transformers and detailed the percentage of defects identified each year.
 - i. Explain the significant deviation of the percentage of defects identified from 2017 to 2018 and from 2018 to 2019.
 - ii. Explain how the average percentage of defects identified has decreased since PECO moved to an eight-year frequency, i.e., it seems odd that the percentage of defects discovered should vary in any significant manner from year to year and that the extension in frequency of inspection should change the identified defect rate in any meaningful way.
 - iii. Confirm that the inspection methodology for above-ground padmount distribution transformers has not changed from the five-year frequency of inspection to the eight-year frequency.
 - d. Provide the cost benefit difference between the 5-year versus 8-year inspection cycle for above-ground padmount transformers.