



**peco**<sup>SM</sup>

AN EXELON COMPANY

**Richard G. Webster, Jr.**  
Vice President  
Regulatory Policy & Strategy

Telephone 215.841.5777  
Fax 215.841.6208  
www.peco.com  
dick.webster@peco-energy.com

PECO  
2301 Market Street  
S15  
Philadelphia, PA 19103

December 12, 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 2 – 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 26, 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](mailto: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 Levine, 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**

Kriss Brown  
Deputy Chief Counsel  
Law Bureau  
Pennsylvania Public Utility Commission  
Commerce Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17105-3265  
[kribrown@pa.gov](mailto:kribrown@pa.gov)

Dan Searfoorce  
Manager, Reliability/Emergency  
Preparedness  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commerce Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17105-3265  
[dsearfoorce@pa.gov](mailto:dsearfoorce@pa.gov)

John Van Zant  
Supervisor, Reliability/Emergency Preparedness  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commerce Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17105-3265  
[jvanzant@pa.gov](mailto:jvanzant@pa.gov)

Brent Killian  
Electric Safety Supervisor  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commerce Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17105-3265  
[bkillian@pa.gov](mailto:bkillian@pa.gov)

Patrick Cicero  
Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[pcicero@paoca.org](mailto:pcicero@paoca.org)

NazAarah Sabree  
Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101  
[ra-sba@pa.gov](mailto:ra-sba@pa.gov)

Nicole Levine  
Senior Vice President and Chief Operating Officer  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103-8699  
[nicole.levine@exeloncorp.com](mailto:nicole.levine@exeloncorp.com)



---

Khadijah Scott (Pa. No. 90008)  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103-8699  
Phone: 215.841.6841  
[khadijah.scott@exeloncorp.com](mailto:khadijah.scott@exeloncorp.com)

Dated: December 12, 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: December 12, 2024

*Responses provided by Nicole Levine, Senior Vice-President and Chief Operating Officer, PECO*

TUS-2

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.

RESPONSE:

PECO maintains a code in its inventory management system (Asset Suite 8, or "AS8") called a Preventative Maintenance Identification ("PMID") code for each Padmount transformer that is active on the PECO system. The PMID code indicates the inspection frequency and the last inspected date for each Padmount. Each year, PECO creates inspection Work Orders in AS8 for the Padmounts that are due that year. When an inspection is completed, PECO updates the completion date within the PMID. A new Inspection Order is then automatically created for that transformer based on the standard transformer inspection cycle configured in AS8. PECO would therefore create a new inspection eight years later based on the recent PMID update.

- b. Explain what conditions constitute "defects" as described for PECO's above-ground, Padmount distribution transformer inspections.

RESPONSE:

The following conditions constitute "defects" as described for PECO's above-ground, Padmount distribution transformer inspections:

<b>FAILURE MODES</b>	<b>FAILURE CAUSES</b>	<b>MAINTENANCE TASKS</b>
Fails to Provide Adequate Cooling	Structural Obstructions / Alignment	Visual Inspection
Fails to Maintain Boundary/Structural Integrity	Gasket Failure	Visual Inspection
Fails to Maintain Boundary/Structural Integrity	Weld Failure	Visual Inspection
Fails to Maintain Boundary/Structural Integrity	Tank Corrosion	Visual Inspection
Fails to Maintain Boundary/Structural Integrity	Tank Over Pressurization	Visual Inspection
Fails to Maintain Boundary/Structural Integrity	Locking Mechanism failure	Security Check
Fails to Maintain Boundary/Structural Integrity	Damaged/Cracked Pad	Visual Inspection
Fails to Provide Adequate Insulation Level	Loss of Oil	Visual Inspection
Fails to Provide Adequate Insulation Level	Vegetation/Animal Intrusion	Visual Inspection

- “Security Check”      Visually confirm that locking mechanism is present.
- “Visual Inspection”      External visual inspection of equipment and miscellaneous hardware that identifies broken / degraded components

c. Reference the table provided by PECO that detailed the above-ground Padmount distribution transformers and detailed the percentage of defects identified each year.

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%

i. Explain the significant deviation of the percentage of defects identified from 2017 to 2018 and from 2018 to 2019.

RESPONSE:

Each year, PECO inspects a different portion of the counties in its service territory. Depending on the condition of the equipment being inspected, an increase or decrease in defects is identified. Inspection results in 2018 yielded less lock and penta bolt replacements as well as less identified alignment defects.

- 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.

RESPONSE

The above table demonstrates that the change in frequency of inspection has not revealed significant differences in defect rates and that the average percentage of defects has decreased only slightly since modifying the inspection cycle (4.7% under five-year cycle vs. 3.6% under eight-year cycle). Accordingly, PECO does not see a need to reduce the frequency of inspection back to five years.

- iii. Confirm that the inspection methodology for above-ground Padmount distribution transformers has not changed from the 5-year frequency of inspection to the eight-year frequency.

RESPONSE

PECO confirms that it has not changed its inspection methodology or procedures as a direct result of modifying its inspection frequency for above-ground, Padmount transformers from five years to eight years.

- d. Provide the cost benefit difference between the 5-year versus 8-year inspection cycle for above-ground Padmount transformers.

RESPONSE

The estimated cost benefit difference identified for the change from 5-year versus 8-year inspection cycle for above-ground Padmount transformers is approximately \$105,000 in O&M savings annually.

**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-2 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: December 12, 2024

A handwritten signature in black ink, appearing to read "Nicole Levine", written in a cursive style.

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