

# Buchanan

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December 16, 2024

**VIA ELECTRONIC FILING**

Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

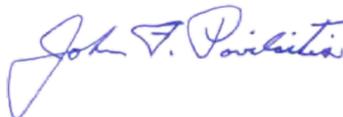
Re: Application of PECO Energy Company Filed Pursuant to Pa. Code  
§ 57.71 *et seq.* for Approval of the Siting and Construction of the PJM 2022  
Reliability Window #3 Project Located in Peach Bottom Township, York  
County, Pennsylvania and Petition for Waiver of 52 Pa. Code  
§ 57.72(c)(10) - Docket No. A- 2024-3051463

Dear Secretary Chiavetta:

Enclosed for filing please find a PreHearing Conference Memorandum of  
Transource Pennsylvania, LLC in the above-captioned proceeding.

Copies are being served in accordance with the attached Certificate of Service.  
Please contact me with any questions or concerns.

Very truly yours,



John F. Povilaitis

JFP/psm  
Enclosure  
cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PECO Energy Company Filed Pursuant :  
to Pa, Code § 57.71 *et seq.* for Approval of the Siting :  
and Construction of the PJM 2022 Reliability Window : Docket No. A- 2024-3051463  
#3 Project Located in Peach Bottom Township, York :  
County, Pennsylvania and Petition for Waiver of 52 Pa :  
Code § 57.72(c)(10)

**PREHEARING CONFERENCE MEMORANDUM OF TRANSOURCE  
PENNSYLVANIA, LLC**

**TO THE HONORABLE DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE  
CHRISTOPHER P. PELL:**

Transource Pennsylvania, LLC (“Transource PA”) hereby submits this Prehearing Conference Memorandum in accordance with 52 Pa. Code § 5.222 of the regulations of the Pennsylvania Public Utility Commission (“PaPUC” or “Commission”) and the November 22, 2024 Prehearing Order of Deputy Chief Administrative Law Judge Christopher P. Pell (“ALJ”) in connection with the telephonic Prehearing Conference to be held on December 19, 2024 at 10:00 a.m.

**I. PROCEDURAL HISTORY**

On September 30, 2024, PECO Energy Company (“PECO”) filed with the PaPUC its Application and Petition for Waiver, pursuant to 52 Pa. Code §§ 57.72 *et seq.* and the Commission’s Interim Guidelines for the Filing of Electric Transmission Line Siting Applications at 52 Pa. Code §§ 69.3101 *et seq.*, requesting Commission approval to site and construct transmission lines and related facilities associated with the PJM<sup>1</sup> 2022 Reliability Window #3

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<sup>1</sup> PJM Interconnection, L.L.C. (“PJM”) is a regional transmission organization that coordinates the movement of wholesale electricity in all or parts of 13 states and the District of Columbia. <https://www.pjm.com/about-pjm>

Project (“Window #3 Application”). PECO also requested waiver of the requirement in 52 Pa. Code § 57.72(c)(10) to provide alternative routes, and of the Commission’s interim guidelines at 52 Pa. Code § 69.3105 to the extent necessary. The Window #3 Application was docketed by the Commission at Docket No. A-2024-3051463.

On September 30, 2024, PECO also filed with the PaPUC its Application and Petition for Waiver, pursuant to 52 Pa. Code §§ 57.72 et seq. and the Commission’s Interim Guidelines for the Filing of Electric Transmission Line Siting Applications at 52 Pa. Code §§ 69.3101 et seq., requesting Commission approval to site and construct transmission lines and related facilities associated with the proposed Brandon Shores Retirement Mitigation Project (“Brandon Shores Application”). Additionally, PECO requests waiver of the requirement in 52 Pa. Code § 57.72(c)(10) to provide alternative routes and of the Commission’s interim guidelines at 52 Pa. Code § 69.3105 to the extent necessary. The Brandon shores Application was docketed by the Commission at Docket No. A-2024-3051467. The Brandon Shores Application and the Window 3 Application are collectively referred to herein as the “Application.”

In a letter dated October 8, 2024, the PaPUC acknowledged the filing of the Application and enclosed a copy of the Publication Notice to be published in the October 19, 2024 issue of the Pennsylvania Bulletin. The Publication Notice set the deadline of December 3, 2024 for the filing of formal protests and petitions to intervene in this proceeding.

The PaPUC directed Deputy Chief ALJ Christopher P. Pell to preside over this proceeding.

On December 3, 2024, Transource PA filed a Petition to Intervene in this proceeding to address some issues identified in the Application that require, in Transource PA’s view, clarification associated with the ownership and location of facilities in connection with PECO’s

proposed transmission lines, with the facilities that Transource PA intends to construct and operate as part of the Bramah Substation Project, as directed by PJM.

The telephonic Prehearing Conference has been scheduled in connection with the Application for December 19, 2024 at 10:00 a.m.

## **II. RESOLUTION OF TRANSOURCE PA ISSUES**

PECO and Transource PA have been engaged in active discussions since the filing of Transource PA's Petition to Intervene, which Transource PA believes will result in PECO filing with the PaPUC selected amendments to various exhibits/attachments to the Application that clarify in more detail aspects of the related PECO and Transource PA projects. The parties are continuing to discuss and hope to resolve any remaining issues. As noted in Transource PA's Petition to Intervene, Transource PA fully supports the relief requested in the Application and urges the Commission to promptly review and approve the Application, as modified.

## **III. LITIGATION SCHEDULE, ISSUES AND WITNESSES**

Since there appears to be no issues in dispute, Transource PA sees no reason to schedule discovery and formal hearings, and fully supports PECO's efforts to have this proceeding transferred to the Commission's Bureau of Technical Utility Services for prompt resolution and the drafting of a recommended order for the PaPUC's consideration, subject to finalizing any remaining issues requiring clarification in connection with the Application. Accordingly, Transource PA supports holding such transfer to the Bureau of Technical Utility Services until February 1, 2025 in order to allow the parties sufficient time to address all amendments to exhibits/attachments that are necessary.

#### IV. OTHER MATTERS

To the extent there is no opposition to Transource PA's pending Petition to Intervene at the time of the Prehearing Conference, Transource PA requests that the ALJ enter a timely order granting Transource PA's request to intervene and participate in all aspects of this proceeding.

Respectfully submitted,

Date: December 16, 2024



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*Counsel for Transource Pennsylvania, LLC*

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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#3 Project Located in Peach Bottom Township, York :  
County, Pennsylvania and Petition for Waiver of 52 Pa :  
Code § 57.72(c)(10) :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

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Date: December 16, 2024

  
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