

# Morgan Lewis

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December 19, 2024

**VIA ELECTRONIC FILING**

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

**Re: Letter of Notification of PECO Energy Company Filed Pursuant to 52 Pa. Code § 57.71 *et seq.* for Approval of the Siting and Construction of the Conowingo 220-47 Line Project Located in Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania Docket No. A-2024-\_\_\_\_\_**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PECO Energy Company (“PECO”) is a Letter of Notification Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for approval to rebuild the existing transmission line and related structures related to the Conowingo 220-47 Line Project from Plymouth Meeting Substation to Flint Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania that are at the end of life. This Letter of Notification is filed pursuant to the Pennsylvania Public Utility Commission’s regulations at 52 Pa. Code § 57.72(d)(1).

PECO respectfully requests Commission review and approval of the Letter of Notification on or before the March 27, 2025 Public Meeting in order to allow construction to commence in April 2025.

Copies of the Letter of Notification and accompanying attachments are being served upon the persons as required by 52 Pa. Code § 57.74 and indicated on the enclosed Certificate of Service.

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Rosemary Chiavetta  
December 19, 2024  
Page 2

If you have any questions pertaining to this matter, please do not hesitate to contact me.

Respectfully submitted,



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*Counsel for PECO Energy Company*

Enclosure

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Letter of Notification of PECO Energy :  
Company Filed Pursuant to 52 Pa. Code §§ :  
57.71 et seq. for Approval of the Siting and :           Docket No. A-2024-\_\_\_\_\_  
Construction of the Conowingo 220-47 Line :  
Project Located in Plymouth Township and :  
Upper Merion Township, Montgomery :  
County, Pennsylvania :**

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**LETTER OF NOTIFICATION OF  
PECO ENERGY COMPANY**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

PECO Energy Company (“PECO” or the “Company”) hereby files this Letter of Notification, pursuant to 52 Pa. Code §§ 57.72(d) requesting Commission approval to rebuild the existing transmission line and related structures related to the Conowingo 220-47 Line Project (hereinafter, the “Project”) from Plymouth Meeting Substation to Flint Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania that are at end of life. The Project will occur entirely within PECO’s existing transmission right-of-way. PECO respectfully requests Commission review and approval of the Letter of Notification on or before the March 27, 2025 Public Meeting in order to allow construction to commence in April 2025.

In support of the approval requested herein, PECO states as follows:

**I.     INTRODUCTION AND OVERVIEW**

1.     This Letter of Notification is filed by PECO, a “public utility,” as defined in 66 Pa.C.S. § 102, that provides electric distribution, transmission, and default service in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. PECO's address is as follows:

PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103

3. The names and addresses of PECO's attorneys in this matter who are authorized to receive notices and communications on their clients' behalf are:

Anthony E. Gay  
PECO Energy Company  
Vice President & General Counsel  
2301 Market Street  
Philadelphia, PA 19103  
(267) 533-1964  
anthony.gay@exeloncorp.com

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4. PECO furnishes electric service to approximately 1.7 million electric customers and also serves over 553,000 natural gas customers throughout its certificated service territory, which encompasses approximately 2,100 square miles in Pennsylvania. PECO owns approximately 1,050 miles of transmission lines, approximately 13,000 miles of aerial distribution facilities, and approximately 9,000 miles of underground distribution facilities. In addition, PECO owns approximately 13,800 miles of natural gas mains and services.

5. The proposed Project is necessary to support the reliability of PECO's transmission system by replacing facilities of the existing 220-47 Line that are at end of life.

6. The estimated cost to design and construct the Project is approximately \$19.8 million. Of that cost, \$4.1 million is attributed to materials (new conductor/hardware, optical ground wire, structures, foundations, substation equipment). The remaining costs are attributable

to direct labor – primary engineering and design, clearance reviews, and electrical/civil construction – and allocated to PECO overhead and management costs. PECO will own, finance, and build the proposed Project. The Department of Energy will reimburse approximately \$5 million of the above cost utilizing funding from the Infrastructure Investment and Jobs Act.

7. The Project has a scheduled construction start date of April 3, 2025, to meet an in-service date of November 11, 2025. The Project requires a transmission outage. The outage for the reconductoring work is currently scheduled for September 6, 2025, to November 11, 2025.

8. Accompanying this Letter of Notification are the following Attachments that provide additional detailed information regarding the Project:

- Attachment 1 – Plan & Profile Drawings
- Attachment 2 – Letter of Notification Filing Checklist

9. This Letter of Notification, including the accompanying Attachments, which are incorporated herein by reference, contains all of the information required by 52 Pa. Code § 57.72(d)(4).

## **II. THE PROJECT**

### **A. Need for the Project**

10. Much of the existing 220-47 Line was constructed in the 1920s, and thus the structures, foundations, and conductors are all nearing 100 years of service and are at end of life. The need for the Project is related to the condition and age of the 220-47 Line. The Project will support the reliability of PECO's transmission system by removing and replacing the aging infrastructure.

### **B. Description of the Proposed Project**

11. The Project involves rebuilding the existing 220-47 Line, which is a 230 kV transmission line running from Plymouth Meeting Substation to Flint Substation, within Plymouth

Township and Upper Merion Township, Montgomery County, Pennsylvania. The transmission line is approximately 2.5 miles, comprised of 16 structures, and entirely located within PECO's existing right-of-way that is approximately 315 feet wide.

12. The Project includes the removal of fourteen lattice structures that are at end of life and rebuilding the existing 220-47 Line with nineteen new steel monopoles. All of the structures will be located within PECO's existing right-of-way near the existing center line and the existing structures. Two of the existing structures will remain in place and be incorporated into the Project. Specifically, the Project will incorporate existing structure 2/3, a weathering steel monopole, and existing structure 2/4, a takeoff structure at the Flint Substation. The new 220-47 Line will have a total number of 21 structures. *See* Attachment 1 for a map of the proposed Project. PECO expects the reliability on the 220-47 Line to increase due to new robust steel structures, conductors, and equipment. PECO anticipates the service life of the new transmission monopoles and appurtenances to be over sixty years. PECO will also replace obsolete equipment at the Plymouth Meeting Substation and Flint Substation including relays, circuit breakers, and disconnect switches.

13. The nineteen replacement structures will be between two and sixty feet taller than the existing structures, as detailed in Attachment 2, Question 6. Existing structures 2/3 and 2/4 will remain at their current heights. *See* PECO Attachment 1, which contains the location of the proposed structures in relationship to existing structures.

14. The 220-47 Line is one of twelve circuits along the approximately 60-mile Conowingo right-of-way from the Conowingo Substation in Maryland to the Plymouth Meeting Substation. Only the 220-47 Line is within the scope of this Project and this Letter of Notification. Transmission line ratings will increase by over fifty percent for the entire Conowingo right-of-way

by utilizing modern technology high-temperature-low-sag conductors. In addition, PECO will make improvements to communications between substations by installing new optical ground wire.

15. There is currently no pending litigation regarding the right-of-way or environmental matters related to the Project.

### **III. HEALTH AND SAFETY**

16. The proposed Project will not create any unreasonable risk of danger to public health or safety. The proposed Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code (“NESC”) minimum standards and all applicable legal requirements. The design, construction and operation of the Project will meet or exceed the requirements specified in the latest revisions of the NESC and all applicable safety standards established by the Occupational Safety and Health Administration (“OSHA”). All work shall be done in accordance with NESC, OSHA and any applicable local, state, or federal requirements.

17. PECO will construct the Project for ground clearances that meet or exceed requirements of its Engineering Practice EPP-2090 OHT Design Clearances. The clearance requirement in EPP-2090 exceeds the requirements of NESC 2023. With respect to vertical clearances, PECO designs its facilities to meet the NESC rules, plus three additional feet of vertical clearance. Similarly, PECO adds two additional feet of horizontal clearance beyond the NESC horizontal clearance rules.

### **IV. DESCRIPTION OF THE PROJECT AREA**

18. As explained above, the 220-47 Line is one of twelve circuits along the approximately 60-mile Conowingo right-of-way from the Conowingo Substation in Maryland to the Plymouth Meeting Substation. The 220-47 Line is approximately 2.5 miles from Plymouth

Meeting Substation to Flint Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania. All construction of the proposed transmission line structures will take place within PECO's existing rights-of-way. Approximately 200 feet of off-right-of-way temporary access roads will be constructed to reach one of the on-right-of-way transmission line structure locations, for which PECO has access agreements in place. Therefore, PECO anticipates that the Project will have minimal incremental impact on land use in the Project area.

19. Vegetative cover in the Project Area consists of maintained right-of-way. Before construction begins, vegetation clearance, including brush and grasses, will occur in specific areas designated for new transmission structure installations. Tree trimming will also take place along various locations to accommodate the re-location of the transmission centerline closer to the right-of-way edge. Additionally, vegetation around existing transmission structures will be cleared to facilitate their demolition and removal. PECO will approach maintaining clear rights-of-way for the Project consistent with its overall vegetation management program and in compliance with North American Electric Reliability Corporation reliability standard FAC-003-5 which mandates certain clearances and activities that electric utilities must adhere to. Pursuant to PECO's vegetation management program, rights-of-way are managed using integrated vegetation management to promote the establishment of low growing compatible plant communities. The edges of the right-of-way are periodically maintained by pruning and tree removals to prevent narrowing over time. Tower areas are regularly maintained to address vegetation that could come into contact with the structure.

20. The closest airport to the Project area is the Wings Field Airport, which is located approximately 2.5 miles from the 220-47 Line. PECO does not anticipate any interference with airport operations because of the distance from the Project area. PECO will file any required

documentation with the Federal Aviation Administration and the Pennsylvania Department of Transportation, Bureau of Aviation. PECO will comply with any additional lighting and other visual aids that may be required by these agencies to ensure aviation safety in the region.

21. The Project will not traverse or affect any unique geological or scenic areas except parts of the Project site are known to be in areas of Karst topography, which is sinkhole-prone. Any Karst features that may affect the Project will be identified during the geotechnical investigation and will be addressed as necessary.

22. The Project will not affect any state lands, national parks, state parks, local parks, recreational areas, or natural landmarks.

23. The Project will cross two wetland areas and four streams including three perennial and one intermittent stream. One of these perennial streams is the Schuylkill River. There are no proposed direct or indirect impacts to these features. Erosion and sediment control devices and best management practices will be in place to prevent sedimentation and impacts to these features. A Pennsylvania Natural Diversity Inventory was required and identified a potentially threatened or endangered species in the vicinity of the Project. However, further review by the Pennsylvania Fish and Boat Commission determined that no adverse impacts are expected to the species of special concern due to the Project.

24. The Project is not expected to have any impacts on communications towers, pipelines, or other utilities.

25. Two of the existing structures are located within a 100-year floodplain, and PECO proposes replacing these two structures and adding a third new structure within this floodplain area. These three structures are 1/2, 1/3, and 2/2. The new structure in this area is necessary to

limit a potential blowout condition for the river crossing span within PECO's right-of-way.<sup>1</sup> PECO will seek all necessary permits for construction within the floodplain area as necessary and does not anticipate any issues with the proposed locations for these structures.

#### V. NOTICE

26. Copies of this Letter of Notification will be served on the governmental agencies, municipalities, and other public entities in accordance with 52 Pa. Code § 57.72(d)(3).

27. PECO will provide such additional forms of notice as may be directed by the Commission.

#### VI. LETTER OF NOTIFICATION

28. PECO is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission's regulations at 52 Pa. Code §§ 57.72(d)(1)(i) and 57.72(d)(1)(v).

29. The proposed Project qualifies for use of a Letter of Notification because the new high voltage transmission line will be located entirely on PECO's existing transmission line right-of-way and the Project will not substantially alter the right-of-way. The proposed Project also qualifies for use of a Letter of Notification because the Project is limited to reconstructing an existing transmission line and, as stated above, will not substantially alter the right-of-way.

30. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification the proposed Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71 *et seq.*

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<sup>1</sup> A transmission line blowout condition refers to the horizontally displaced conductor shape under six pounds per square foot of transverse wind.

**VII. CONCLUSION**

WHEREFORE, PECO respectfully requests the Commission grant approval to rebuild the existing transmission line and related structures related to the Project from Plymouth Meeting Substation to Flint Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania that are at end of life.

Respectfully submitted,



\_\_\_\_\_  
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Dated: December 19, 2024

# 220-47 LINE CONOWINGO REBUILD PHASE 1

## GENERAL NOTES:

1. ALL WORK DONE BY CONTRACTOR/INSTALLER PURSUANT TO THIS DRAWING SHALL:
  - (A) CONFORM TO THE GOVERNING CONTRACT DOCUMENTS;
  - (B) BE PERFORMED EXCLUSIVELY BY ITS TRAINED, COMPETENT PERSONNEL OR, WHERE PERMITTED, THAT OF ITS SUBCONTRACTOR(S); AND
  - (C) COMPLY WITH ALL APPLICABLE SAFETY LAWS, REGULATIONS, PROGRAMS AND PRACTICES TO ENSURE THE SAFETY OF ALL PEOPLE LOCATED ON THE WORK SITE, INCLUDING THE CONTRACTOR'S/INSTALLER'S PERSONNEL (OR THAT OF ITS SUBCONTRACTOR(S)) PERFORMING THE WORK.
2. UNDERGROUND OR EMBEDDED UTILITIES [MAY] EXIST WITHIN THE AREA OF AND ADJACENT TO THE LIMITS OF THE WORK. THE LOCATION OR IDENTIFICATION OF SUCH UTILITIES HAS NOT BEEN VERIFIED BY OWNER OR BY S&L. CONTRACTOR/INSTALLER IS RESPONSIBLE FOR FIELD LOCATING AND IDENTIFYING UNDERGROUND OR EMBEDDED UTILITIES AND ANY OTHER UNDERGROUND OR EMBEDDED UTILITY DIMENSIONS.
3. REFERENCES USED HAVE BEEN IDENTIFIED ON EXCAVATION/FOUNDATION/DEMOLITION DRAWINGS AND HAVE BEEN PROVIDED TO ASSIST THE CONTRACTOR/INSTALLER IN THE FIELD LOCATING EXISTING UTILITIES AND OTHER POTENTIAL UNDERGROUND OR EMBEDDED INTERFERENCES. THESE REFERENCES ONLY SHOW THE APPROXIMATE LOCATION OF POTENTIAL UNDERGROUND OR EMBEDDED UTILITIES AND MAY NOT INDICATE OR REFLECT ALL EXISTING UNDERGROUND OR EMBEDDED UTILITIES OR THEIR ACTUAL LOCATIONS.
4. REFERENCES IDENTIFIED SHALL NOT SUBSTITUTE FOR THE CONTRACTOR'S/INSTALLER'S OBLIGATION TO FIELD LOCATE ANY UNDERGROUND OR EMBEDDED UTILITIES OR INTERFERENCES THAT MAY AFFECT THE WORK.
5. DUE CAUTION SHALL BE TAKEN DURING ANY EXCAVATION/FOUNDATION/DEMOLITION WORK WITHIN THE AREA OF AND ADJACENT TO THE LIMITS OF THE WORK DUE TO POSSIBLE INTERFERENCES THAT MAY NOT BE REFLECTED ON THE REFERENCES IDENTIFIED.
6. EXISTING DISTRIBUTION LINES IN CONFLICT WITH TRANSMISSION DESIGN TO BE RELOCATED PRIOR TO TRANSMISSION STRUCTURE INSTALLTION.

## DRAWING INDEX:

DRAWING NUMBER	SHEET	DESCRIPTION
C-275403	2	STRUCTURE LIST
C-275403	3-7	PLAN & PROFILE
C-275404	1	STRUCTURE STAKING
C-275404	2-3	FOUNDATION SCHEDULE
C-275406	1-3	HORZ. STRUCTURE LOAD SCHEDULE
C-275406	4	HORZ. STRUCTURE FRAMING
C-275485	1-3	DAMPER SCHEDULE
C-275485	4-48	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP
C-275486	8-11	ADSS INSTALLATION DETAILS
C-275487	1-3	0°-2° SUSP. STRUCTURE LOAD SCHEDULE
C-275487	4	0°-2° SUSP. STRUCTURE FRAMING
C-275488	1-3	2.1°-3° SUSP. STRUCTURE LOAD SCHEDULE
C-275488	4	2.1°-3° SUSP. STRUCTURE FRAMING
C-275489	1-3	3.1°-12° LIGHT ANGLE STRUCTURE LOAD SCHEDULE
C-275489	4	3.1°-12° LIGHT ANGLE STRUCTURE FRAMING
C-275490	1-3	0°-45° DEADEND STRUCTURE LOAD SCHEDULE
C-275490	4	0°-45° DEADEND STRUCTURE FRAMING
C-275491	1-5	ASSEMBLY DETAILS
C-250562	2	EXISTING STRUCTURE 2/3S RE-FRAME FRAMING
C-250562	3	EXISTING STRUCTURE 2/4S RE-FRAME FRAMING
C-250562	9	EXISTING STRUCTURE 2/3S RE-FRAME ASSEMBLIES
C-275692	1	EXISTING FLINT A FRAME OPGW DOWNLEAD AND SPLICE WELDS
C-275693	1-3	EXISTING MONOPOLES OPGW DOWNLEAD AND SPLICE WELDS

**WORK ORDERS:**  
 WO# 19393568 - I IJA FUNDED MATERIAL  
 WO# 18380386 - LABOR & NON-I IJA FUNDED MATERIAL

REV	DATE	DESCRIPTION	PREPARED	REVIEWED	APPROVED
0	12/13/2024	ISSUED FOR CONSTRUCTION			

**Sargent & Lundy**

PROFESSIONAL CERTIFICATION: I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A FULLY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF PENNSYLVANIA. LICENSE NO. PE008502. EXPIRATION DATE: 09/30/2028.

DATE: 12/13/24

TABLE OF ADDITIONS & CHANGES USE ONLY PRINTS SHOWING LATEST DATE			
NO.	DATE	DESCRIPTION	REV'D
A1	11/23	EC# 383558 WP# 18380386 & 19393568 SARGENT & LUNDY ADDED THIS DRAWING ISSUED FOR APPROVAL	S&L S&L S&L
A2	07/26	EC# 383558 WP# 18380386 & 19393568 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR APPROVAL	S&L S&L S&L
A3	12/13	EC# 383558 WP# 18380386 & 19393568 SARGENT & LUNDY ADDED THIS DRAWING ISSUED FOR CONSTRUCTION	S&L S&L S&L

CIVIL		275403	
COVER SHEET CONOWINGO REBUILD PHASE 1 FLINT TO PLYMOUTH			
220-47 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
APPROVED	APPROVED		
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 1 OF 8		C-275403-A3	

C-275403

ROUTE ATLINBMD

STRUCTURE NUMBER	STRUCTURE TYPE	STRUCTURE HEIGHT (FT)	LINE ANGLE (DEG)	LOAD DRAWING NUMBER	STEEL DETAILS DRAWING NUMBER	OPGW SPLICE PROVISIONS DRAWING NUMBER	FRAMING DRAWING NUMBER	CONDUCTOR ARMS TO BE FABRICATED AND INSTALLED	POLE CAT-ID	ANCHOR BOLT CAT-ID	VENDOR	FABRICATION DRAWING NUMBER
2/4S	EXISTING A-FRAME	65	0.00	-	-	275692 SH 1	250562 SH 2	-	-	-	(EXISTING STR.)	238528
2/3S	EXISTING MONOPOLE	115	63.14	-	-	-	250562 SH 3	-	-	-	(EXISTING STR.)	237284
2/2-1	230-DE(0-45)-180	180	-24.38	275490 SH 1	275490 SH 2	275490 SH 3	275490 SH 4	C1, C2, C4	1686245	1686641	MEYER	*
2/2	230-Tan(0-2)-185	185	1.58	275487 SH 1	275487 SH 2	-	275487 SH 4	C1, C2, C4	1686260	1686547	VALMONT	*
2/1	230-LA(3.1-12)-170	170	10.49	275489 SH 1	275489 SH 2	-	275489 SH 4	C1, C2, C4	1686266	1686500	NUCOR	*
1/7	230-Tan(0-2)-160	160	-0.76	275487 SH 1	275487 SH 2	-	275487 SH 4	C1, C2, C4	1686253	1686567	VALMONT	*
1/6	230-Tan(0-2)-140	140	0.86	275487 SH 1	275487 SH 2	-	275487 SH 4	C1, C2, C4	1686249	1686638	VALMONT	*
1/5	230-Tan(0-2)-150	150	1.01	275487 SH 1	275487 SH 2	-	275487 SH 4	C1, C2, C4	1686251	1686633	VALMONT	*
1/4	230-DE(0-45)-150	150	-3.63	275490 SH 1	275490 SH 2	-	275490 SH 4	C1, C2, C4	1686243	1686643	MEYER	*
1/3	230-Tan(0-2)-155	155	-0.39	275487 SH 1	275487 SH 2	-	275487 SH 4	C1, C2, C4	1686252	1686568	VALMONT	*
1/2	230-LA(3.1-12)-170	170	7.27	275489 SH 1	275489 SH 2	-	275489 SH 4	C1, C2, C4	1686266	1686500	NUCOR	*
1/1	230-Tan(0-2)-170	170	1.60	275487 SH 1	275487 SH 2	-	275487 SH 4	C1, C2, C4	1686256	1686565	VALMONT	*
0/9	230-DE(0-45)-160	160	12.13	275490 SH 1	275490 SH 2	275490 SH 3	275490 SH 4	C1, C2, C4	1686244	1686642	MEYER	*
0/8	230-Tan(0-2)-160	160	1.06	275487 SH 1	275487 SH 2	-	275487 SH 4	C1, C2, C4	1686253	1686567	VALMONT	*
0/7	230-Tan(2.1-3)-160	160	2.86	275488 SH 1	275488 SH 2	-	275488 SH 4	C1, C2, C4	1686262	1686542	VALMONT	*
0/6	230-Tan(0-2)-160	160	-0.96	275487 SH 1	275487 SH 2	-	275487 SH 4	C1, C2, C4	1686253	1686567	VALMONT	*
0/5	230-Tan(0-2)-150	150	0.56	275487 SH 1	275487 SH 2	-	275487 SH 4	C1, C2, C4	1686251	1686633	VALMONT	*
0/4	230-Tan(0-2)-150	150	0.50	275487 SH 1	275487 SH 2	-	275487 SH 4	C1, C2, C4	1686251	1686633	VALMONT	*
0/3	230-DE(0-45)-150	150	40.76	275490 SH 1	275490 SH 2	-	275490 SH 4	C1, C2, C4	1686243	1686643	MEYER	*
0/2	Unique-Horz. DE-120	120	14.25	275406 SH 1	275406 SH 2	275406 SH 3	275406 SH 4	-	N/A	N/A	NUCOR	*
0/1	Unique-Sub TO-90	90	9.05	275402 SH 1	275402 SH 1	275402 SH 1	275402 SH 3	-	N/A	N/A	NUCOR	*

HOLD - PENDING FINAL REVISION OF VENDOR DRAWINGS

REV	DATE	DESCRIPTION	PREPARED	REVIEWED	APPROVED
3	12/13/2024	ISSUE FOR CONSTRUCTION	MH	RG	NB
2	08/13/2024	RE-ISSUE FOR FABRICATION	MH	RG	NB
1	04/17/24	RE-ISSUE FOR FABRICATION	MH	RG	NB
0	01/31/24	ISSUE FOR FABRICATION	MH	RG	ML

ANY MODIFICATION OR ADDITION TO THIS DRAWING BY ANY ORGANIZATION OTHER THAN SARGENT & LUNDY IS NOT THE RESPONSIBILITY OF SARGENT & LUNDY.

Sargent & Lundy  
600 DELAWARE AVE., WILMINGTON, DE  
PROJ. No. 13710.161

**Sargent & Lundy**

PROFESSIONAL CERTIFICATION: I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME AND THAT I AM A QUALY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF PENNSYLVANIA. LICENSE NO. PE006800. EXPIRATION DATE: 09/03/2025.

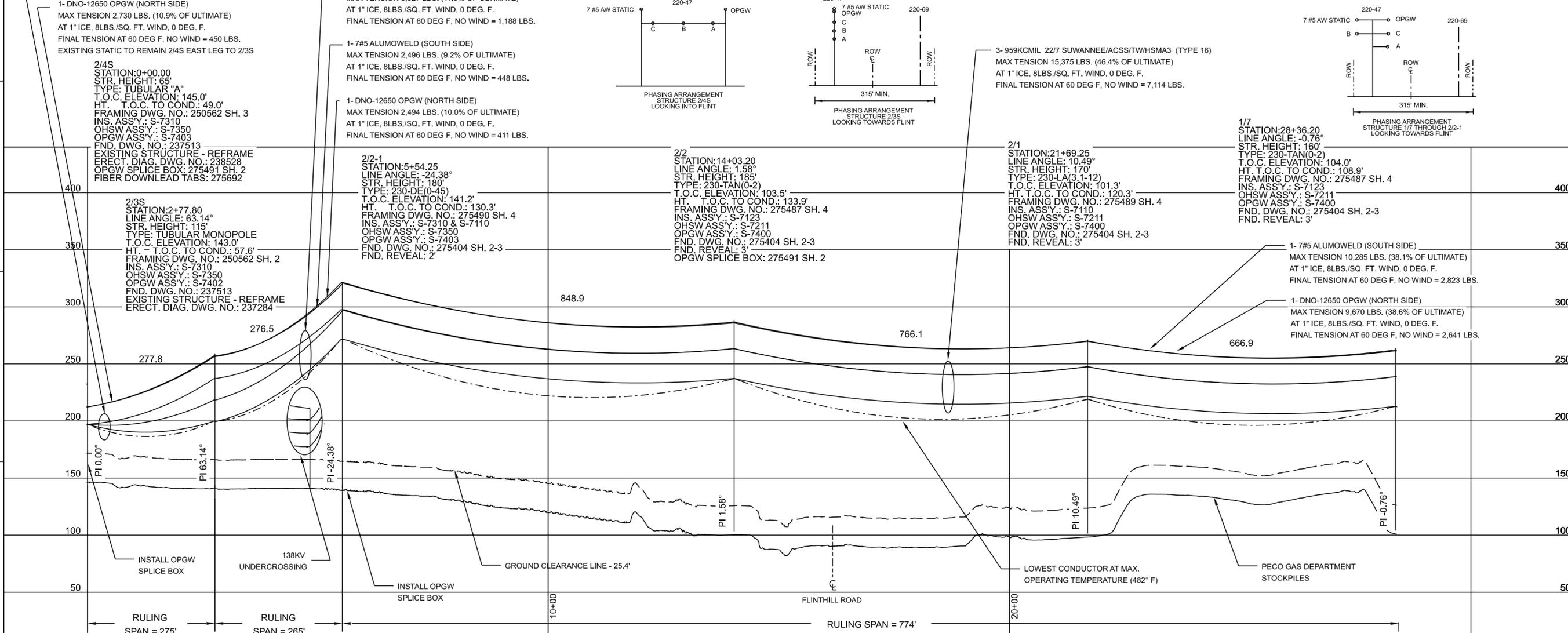
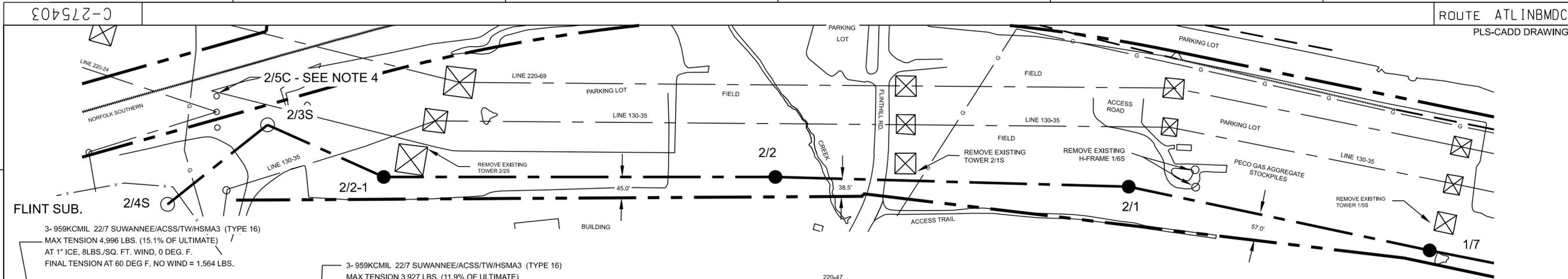
DATE: 12/13/24

*R. Gendrey*  
R. E. GENDREY  
REGISTERED PROFESSIONAL ENGINEER  
STATE OF PENNSYLVANIA  
LICENSE NO. PE006800

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A3	06/13/24	EC# 303558 WB# 19393568 SARGENT & LUNDY ADDED: CAT-IDS FOR AB	SAL	SAL	SAL
A4	12/13/24	EC# 303558 WB# 19393568 SARGENT & LUNDY ADDED: VENDORS & FRAMINGS	SAL	SAL	SAL

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A1	01/31/24	EC# 303558 WB# 18380386 SARGENT & LUNDY ADDED: THIS DRAWING & ISSUED FOR FABRICATION	SAL	SAL	SAL
A2	04/18/24	EC# 303558 WB# 19393568 SARGENT & LUNDY ADDED: CAT-IDS FOR POLES UPDATED: WB#	SAL	SAL	SAL

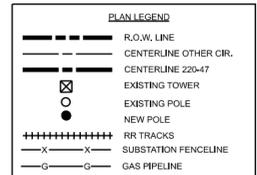
CIVIL		275403	
STRUCTURE LIST CONOWINGO REBUILD PHASE 1 AND 2 FLINT TO PLYMOUTH			
220-47 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
		12/13/24	
APPROVED	APPROVED		
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 2 OF 8		C-275403-A4	



**NOTES:**  
1. SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING  
2. ALL WIRES DISPLAYED AT 60° F.  
3. EXISTING OPGW BETWEEN 220-24 STR 2/6 AND EXISTING 220-47 STR 2/2S TO BE TRANSFERRED. DO NOT CUT EXISTING OPGW BETWEEN THESE STRUCTURES. TRANSFER OPGW FROM STR 2/2S TO STR 2/5C AND COIL AT STR. 2/5C. SEE FIBER CONNECTIVITY MAP C-275486 FOR DETAILS.  
4. SEE DRAWING C-250652SH. 15 FOR HARDWARE. STRUCTURE STRENGTH QUALIFIED BY OTHERS. STINGING CHARTS BY OTHERS, S&L DOES NOT TAKE RESPONSIBILITY FOR CAPACITY OR CONDITION OF EXISTING STRUCTURE 2/5.

**REFERENCE DRAWINGS:**

DRAWING NUMBER	SHEET	DESCRIPTION
C-275403	1	COVER SHEET
C-275403	2	STRUCTURE LIST
C-275403	3-8	PLAN & PROFILE
C-275404	1	STRUCTURE STAKING
C-275404	2-3	FOUNDATION SCHEDULE
C-275485	1-3	DAMPER SCHEDULE
C-275485	4-48	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP



REV	DATE	DESCRIPTION	PREPARED	REVIEWED	APPROVED
0	12/13/2024	ISSUED FOR CONSTRUCTION			

ANY MODIFICATION OR ADDITION TO THIS DRAWING BY ANY ORGANIZATION OTHER THAN SARGENT & LUNDY IS NOT THE RESPONSIBILITY OF SARGENT & LUNDY

500 DELAWARE AVE., WILMINGTON, DE. PROJ. No. 13710.161

**Sargent & Lundy**

PROFESSIONAL CERTIFICATION: I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME AND THAT I AM A QUALIFIED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF PENNSYLVANIA. LICENSE NO. PE008024. EXPIRATION DATE: 09/30/2026.

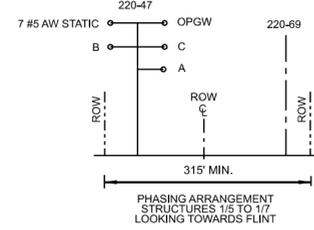
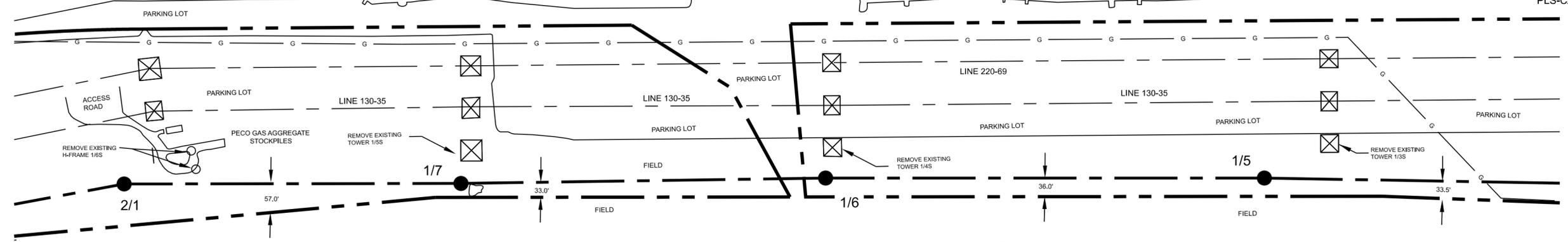
DATE: 12/13/24

**RUMEN E. GENCHEV**  
REGISTERED PROFESSIONAL ENGINEER  
PENNSYLVANIA

**TABLE OF ADDITIONS & CHANGES**  
USE ONLY PRINTS SHOWING LATEST DATE

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A1	11/01/23	EC* 383558 M* 18366386 & 19393568 SARGENT & LUNDY ADDED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A2	07/26/24	EC* 383558 M* 18366386 & 19393568 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A3	12/13/24	EC* 383558 M* 18366386 & 19393568 SARGENT & LUNDY ADDED THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

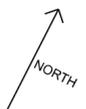
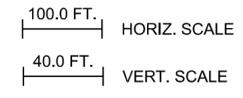
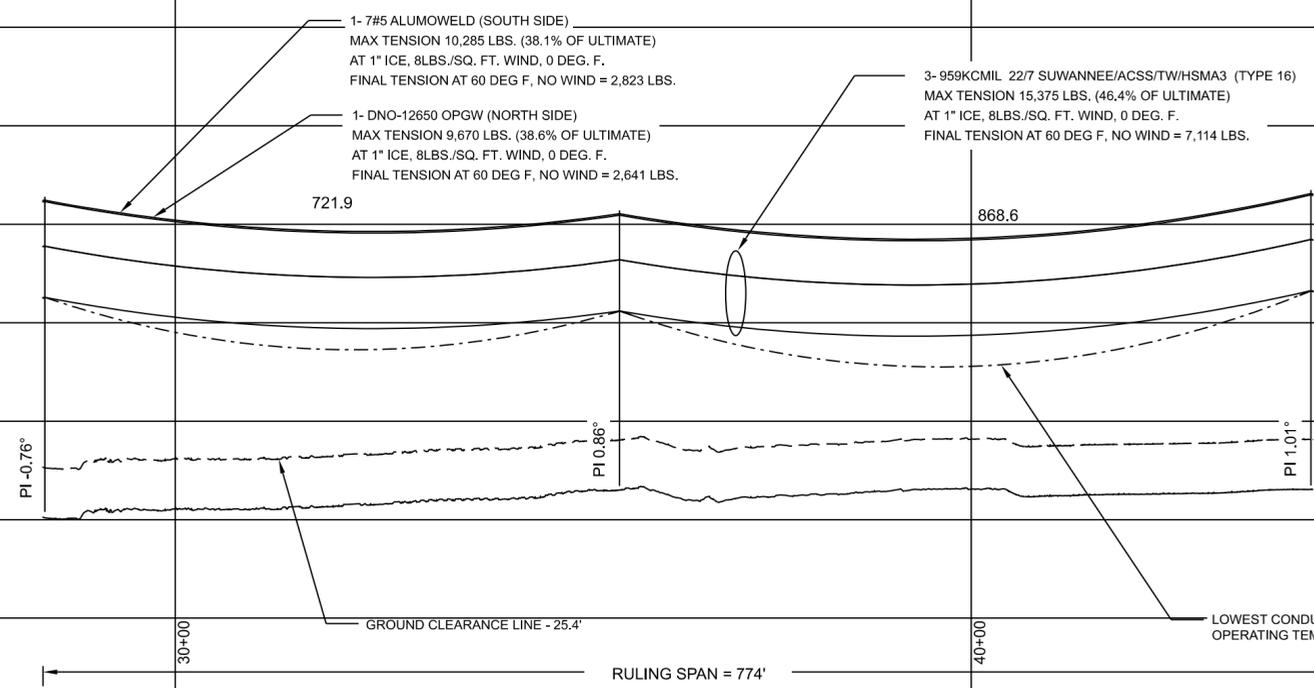
CIVIL		275403	
PLAN AND PROFILE CONOWINGO REBUILD PHASE 1 AND 2 FLINT TO PLYMOUTH			
220-47 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
S&L		12/13/24	
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 3 OF 8		C-275403-A3	



1/7  
 STATION: 28+36.20  
 LINE ANGLE: -0.76°  
 STR. HEIGHT: 160'  
 TYPE: 230-TAN(0-2)  
 T.O.C. ELEVATION: 104.0'  
 HT. T.O.C. TO COND.: 108.9'  
 FRAMING DWG. NO.: 275487 SH. 4  
 INS. ASSY.: S-7123  
 OHSW ASSY.: S-7211  
 OPGW ASSY.: S-7400  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 3'

1/6  
 STATION: 35+58.14  
 LINE ANGLE: 0.86°  
 STR. HEIGHT: 140'  
 TYPE: 230-TAN(0-2)  
 T.O.C. ELEVATION: 117.1'  
 HT. T.O.C. TO COND.: 88.9'  
 FRAMING DWG. NO.: 275487 SH. 4  
 INS. ASSY.: S-7123  
 OHSW ASSY.: S-7211  
 OPGW ASSY.: S-7400  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 2'

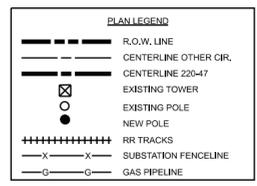
1/5  
 STATION: 44+26.73  
 LINE ANGLE: 1.01°  
 STR. HEIGHT: 150'  
 TYPE: 230-TAN(0-2)  
 T.O.C. ELEVATION: 117.4'  
 HT. T.O.C. TO COND.: 98.9'  
 FRAMING DWG. NO.: 275487 SH. 4  
 INS. ASSY.: S-7123  
 OHSW ASSY.: S-7211  
 OPGW ASSY.: S-7400  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 2'



- NOTES:
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
  - ALL WIRES DISPLAYED AT 60° F.

REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-275403	1	COVER SHEET
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C-275403	3-8	PLAN & PROFILE
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C-275404	2-3	FOUNDATION SCHEDULE
C-275485	1-3	DAMPER SCHEDULE
C-275485	4-8	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP



REV	DATE	DESCRIPTION	PREPARED	REVIEWED	APPROVED
0	12/13/2024	ISSUED FOR CONSTRUCTION			
1					

ANY MODIFICATION OR ADDITION TO THIS DRAWING BY ANY ORGANIZATION OTHER THAN SARGENT & LUNDY IS NOT THE RESPONSIBILITY OF SARGENT & LUNDY

Sargent & Lundy  
 500 DELAWARE AVE. WILMINGTON, DE. PROJ. No. 13710.161

Sargent & Lundy

PROFESSIONAL CERTIFICATION, I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF PENNSYLVANIA, LICENSE NO. PE008202.

DATE: 12/13/24

RUMEN E. GENCHEV

TABLE OF ADDITIONS & CHANGES  
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A1	11/01/23	EC* 383558 WP* 18386386 & 19393568 SARGENT & LUNDY ADDED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A2	07/26/24	EC* 383558 WP* 18386386 & 19393568 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A3	12/13/24	EC* 383558 WP* 18386386 & 19393568 SARGENT & LUNDY ADDED THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

CIVIL		275403	
PLAN AND PROFILE CONOWING REBUILD PHASE 1 AND 2 FLINT TO PLYMOUTH			
220-47 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
S&L		12/13/24	
APPROVED	APPROVED		
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 4 OF 8		C-275403-A3	

F

E

D

C

B

A

F

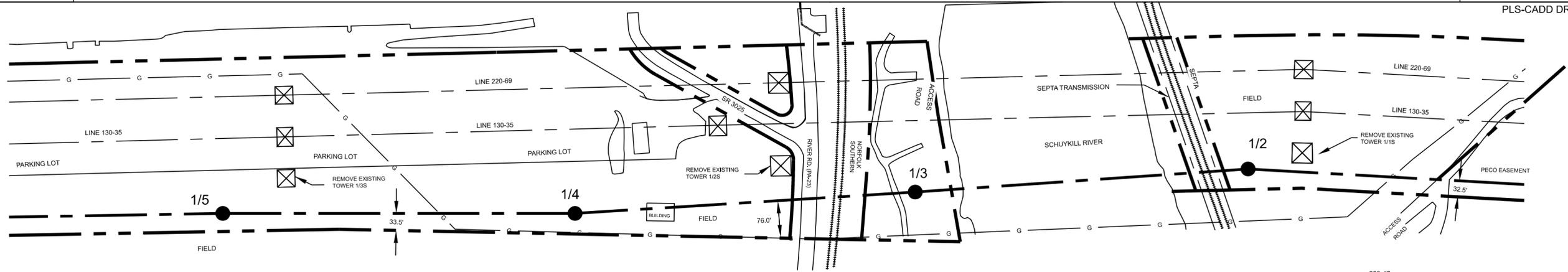
E

D

C

B

A



1- DNO-12650 OPGW (NORTH SIDE)  
 MAX TENSION 9,670 LBS. (38.6% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 2,641 LBS.

1- 7#5 ALUMOWELD (SOUTH SIDE)  
 MAX TENSION 10,285 LBS. (38.1% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 2,823 LBS.

3- 959KCMIL 22/7 SUWANNEE/ACSS/TW/HMSA3 (TYPE 16)  
 MAX TENSION 15,375 LBS. (46.4% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 7,114 LBS.

3- 959KCMIL 22/7 SUWANNEE/ACSS/TW/HMSA3 (TYPE 16)  
 MAX TENSION 13,900 LBS. (42.0% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 6,465 LBS.

1/5 STATION: 44+26.73  
 LINE ANGLE: 1.01°  
 STR. HEIGHT: 150'  
 TYPE: 230-TAN(0-2)  
 T.O.C. ELEVATION: 117.4'  
 HT. T.O.C. TO COND.: 98.9'  
 FRAMING DWG. NO.: 275487 SH. 4  
 INS. ASS'Y.: S-7123  
 OHSW ASS'Y.: S-7211  
 OPGW ASS'Y.: S-7400  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 2'

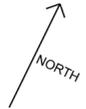
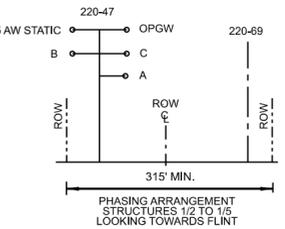
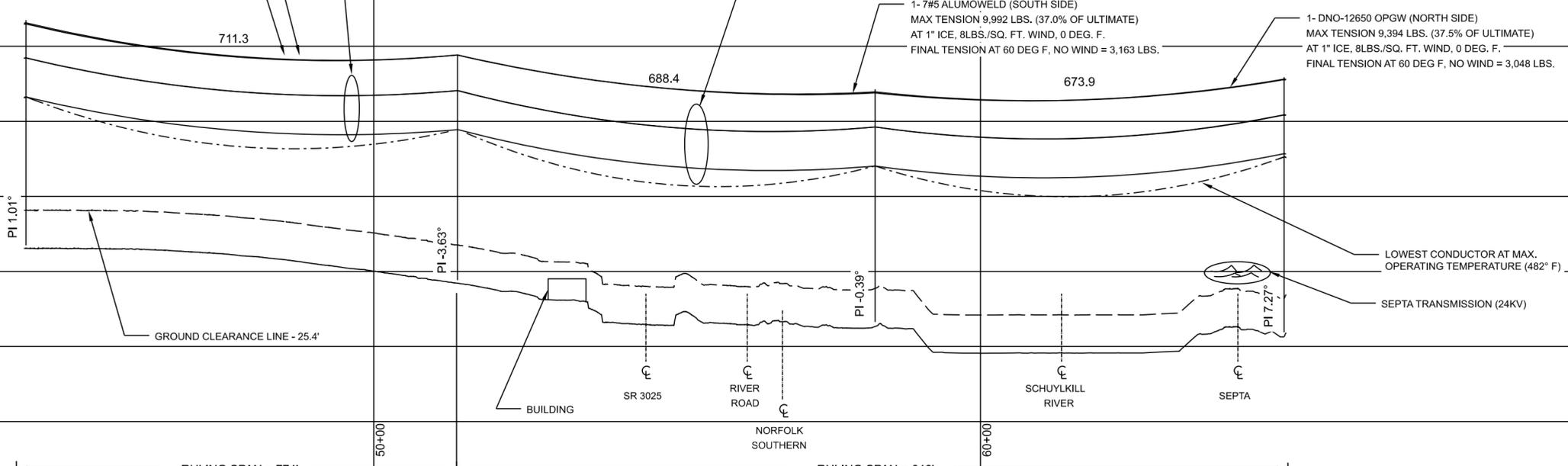
1/4 STATION: 51+38.07  
 LINE ANGLE: -3.63°  
 STR. HEIGHT: 150'  
 TYPE: 230-DE(0-45)  
 T.O.C. ELEVATION: 94.2'  
 HT. T.O.C. TO COND.: 100.3'  
 FRAMING DWG. NO.: 275490 SH. 4  
 INS. ASS'Y.: S-7310 & S-7110  
 OHSW ASS'Y.: S-7350  
 OPGW ASS'Y.: S-7402  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 2'

1/3 STATION: 58+26.48  
 LINE ANGLE: -0.39°  
 STR. HEIGHT: 155'  
 TYPE: 230-TAN(0-2)  
 T.O.C. ELEVATION: 66.3'  
 HT. T.O.C. TO COND.: 103.9'  
 FRAMING DWG. NO.: 275487 SH. 4  
 INS. ASS'Y.: S-7123  
 OHSW ASS'Y.: S-7211  
 OPGW ASS'Y.: S-7400  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 3'

1/2 STATION: 65+00.36  
 LINE ANGLE: 7.27°  
 STR. HEIGHT: 170'  
 TYPE: 230-LAI(3.1-12)  
 T.O.C. ELEVATION: 59.4'  
 HT. T.O.C. TO COND.: 119.6'  
 FRAMING DWG. NO.: 275489 SH. 4  
 INS. ASS'Y.: S-7110  
 OHSW ASS'Y.: S-7211  
 OPGW ASS'Y.: S-7400  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 3'

1- 7#5 ALUMOWELD (SOUTH SIDE)  
 MAX TENSION 9,992 LBS. (37.0% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 3,163 LBS.

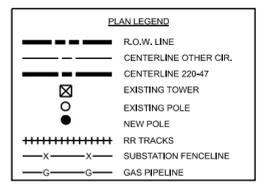
1- DNO-12650 OPGW (NORTH SIDE)  
 MAX TENSION 9,394 LBS. (37.5% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 3,048 LBS.



- NOTES:
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
  - ALL WIRES DISPLAYED AT 60° F.

REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-275403	1	COVER SHEET
C-275403	2	STRUCTURE LIST
C-275403	3-8	PLAN & PROFILE
C-275404	1	STRUCTURE STAKING
C-275404	2-3	FOUNDATION SCHEDULE
C-275485	1-3	DAMPER SCHEDULE
C-275485	4-48	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP



REV	DATE	DESCRIPTION	PREPARED	REVIEWED	APPROVED
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Sargent & Lundy  
500 DELAWARE AVE., WILMINGTON, DE. PROJ. No. 13710.161

Sargent & Lundy

PROFESSIONAL CERTIFICATION, I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A QUALIFIED LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF BRUNSWICK, LICENSE NO. PE08920.

DATE: 12/13/24

RUMEN E. GENCHEV  
REGISTERED PROFESSIONAL ENGINEER  
STATE OF BRUNSWICK

TABLE OF ADDITIONS & CHANGES  
USE ONLY PRINTS SHOWING LATEST DATE

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A1	11/01/23	EC* 383558 WP* 1836836 & 1939368 SARGENT & LUNDY ADDED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A2	07/26/24	EC* 383558 WP* 1836836 & 1939368 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A3	12/24/24	EC* 383558 WP* 1836836 & 1939368 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

CIVIL 275403

PLAN AND PROFILE  
CONOWING REBUILD PHASE 1 AND 2  
FLINT TO PLYMOUTH

220-47 LINE  
PECO Energy Company

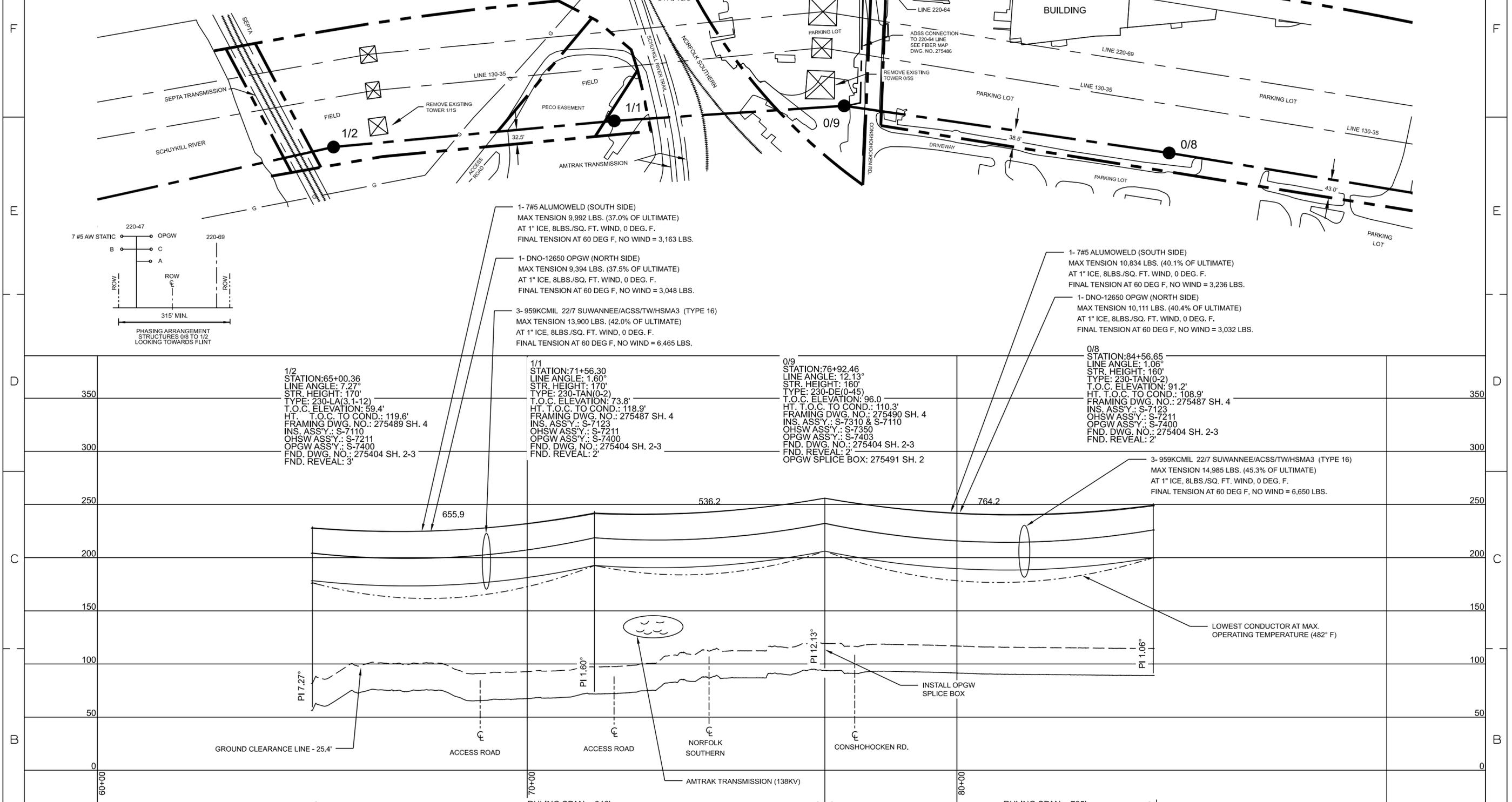
SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	S&L	S&L				12/13/24

APPROVED \_\_\_\_\_ APPROVED \_\_\_\_\_

APPROVED \_\_\_\_\_ APPROVED \_\_\_\_\_

SHEET 5 OF 8 C-275403-A3

1 PLOT SCALE 1:0  
FILE SCALE

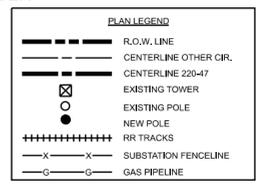


100.0 FT. HORIZ. SCALE  
40.0 FT. VERT. SCALE

**NOTES:**  
1. SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING  
2. ALL WIRES DISPLAYED AT 60° F.  
3. COIL EXISTING OPGW CURRENTLY ATTACHED TO EXISTING TOWER 0/5S WAIST ONTO EXISTING 220-64 STRUCTURE 13/5. SPLICE OPGW TO NEW ADSS CONNECTION. SEE FIBER CONNECTIVITY MAP C-275486 FOR DETAILS.

**REFERENCE DRAWINGS:**

DRAWING NUMBER	SHEET	DESCRIPTION
C-275403	1	COVER SHEET
C-275403	2	STRUCTURE LIST
C-275403	3-8	PLAN & PROFILE
C-275404	1	STRUCTURE STAKING
C-275404	2-3	FOUNDATION SCHEDULE
C-275485	1-3	DAMPER SCHEDULE
C-275485	4-48	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP



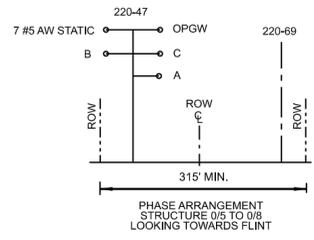
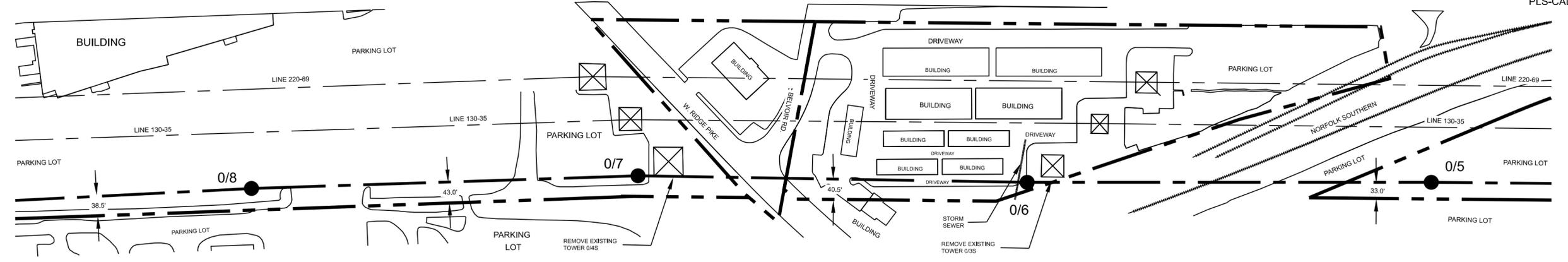
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DATE: 12/13/24  
RUMEN E. GENCHEV  
REGISTERED PROFESSIONAL ENGINEER  
PENNSYLVANIA

**TABLE OF ADDITIONS & CHANGES**  
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A2	07/26/24	EC* 383558 WP 18386386 & 19393568 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A3	12/13/24	EC* 383558 WP 18386386 & 19393568 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

CIVIL		275403	
PLAN AND PROFILE CONOWING REBUILD PHASE 1 AND 2 FLINT TO PLYMOUTH			
220-47 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
S&L	S&L	12/13/24	
APPROVED	APPROVED		
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 6 OF 8		C-275403-A3	

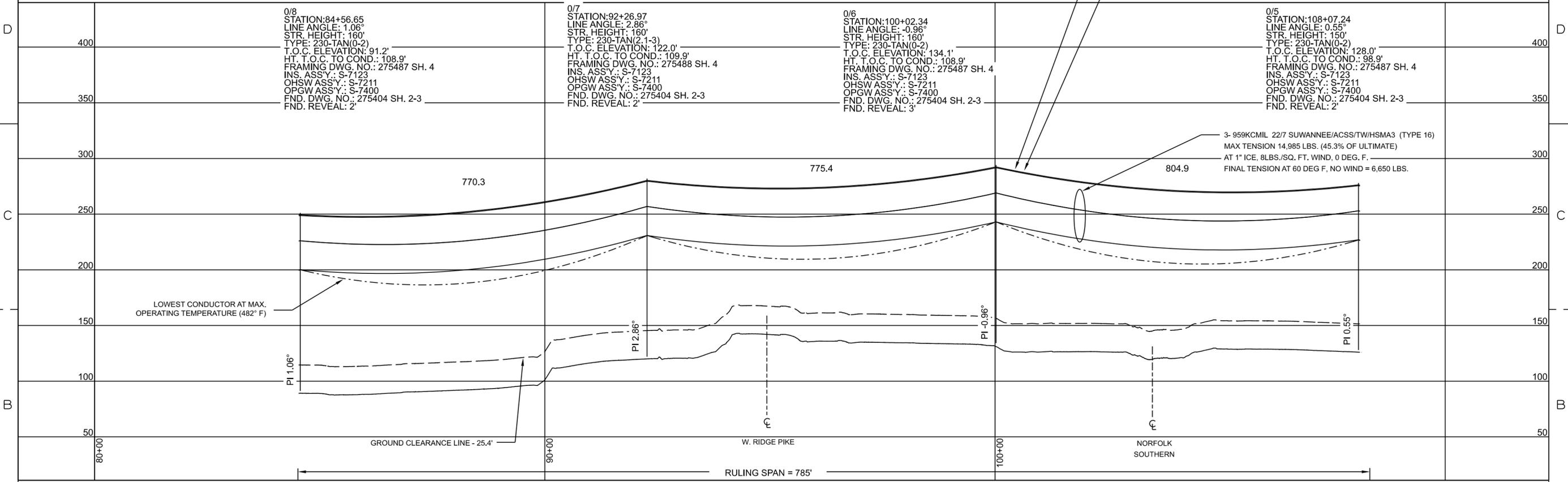


1- 7#5 ALUMOWELD (SOUTH SIDE)  
 MAX TENSION 10,834 LBS. (40.1% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 3,236 LBS.

1- DNO-12650 OPGW (NORTH SIDE)  
 MAX TENSION 10,111 LBS. (40.4% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 3,032 LBS.

0/8 STATION: 84+56.65 LINE ANGLE: 1.06° STR. HEIGHT: 160' TYPE: 230-TAN(0-2) T.O.C. ELEVATION: 91.2' HT. T.O.C. TO COND.: 108.9' FRAMING DWG. NO.: 275487 SH. 4 INS. ASS'Y.: S-7123 OHSW ASS'Y.: S-7211 OPGW ASS'Y.: S-7400 FND. DWG. NO.: 275404 SH. 2-3 FND. REVEAL: 2'	0/7 STATION: 92+26.97 LINE ANGLE: 2.86° STR. HEIGHT: 160' TYPE: 230-TAN(2.1-3) T.O.C. ELEVATION: 122.0' HT. T.O.C. TO COND.: 109.9' FRAMING DWG. NO.: 275488 SH. 4 INS. ASS'Y.: S-7123 OHSW ASS'Y.: S-7211 OPGW ASS'Y.: S-7400 FND. DWG. NO.: 275404 SH. 2-3 FND. REVEAL: 2'	0/6 STATION: 100+02.34 LINE ANGLE: -0.96° STR. HEIGHT: 160' TYPE: 230-TAN(0-2) T.O.C. ELEVATION: 134.1' HT. T.O.C. TO COND.: 108.9' FRAMING DWG. NO.: 275487 SH. 4 INS. ASS'Y.: S-7123 OHSW ASS'Y.: S-7211 OPGW ASS'Y.: S-7400 FND. DWG. NO.: 275404 SH. 2-3 FND. REVEAL: 3'	0/5 STATION: 108+07.24 LINE ANGLE: 0.55° STR. HEIGHT: 150' TYPE: 230-TAN(0-2) T.O.C. ELEVATION: 128.0' HT. T.O.C. TO COND.: 98.9' FRAMING DWG. NO.: 275487 SH. 4 INS. ASS'Y.: S-7123 OHSW ASS'Y.: S-7211 OPGW ASS'Y.: S-7400 FND. DWG. NO.: 275404 SH. 2-3 FND. REVEAL: 2'
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3- 959KCMIL 22/7 SUWANNEE/ACSS/TW/HMSA3 (TYPE 16)  
 MAX TENSION 14,985 LBS. (45.3% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 6,650 LBS.

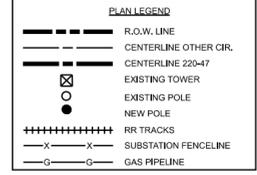


100.0 FT. HORIZ. SCALE  
 40.0 FT. VERT. SCALE  
 NORTH

- NOTES:
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
  - ALL WIRES DISPLAYED AT 60° F.

REFERENCE DRAWINGS:

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C-275404	2-3	FOUNDATION SCHEDULE
C-275485	1-3	DAMPER SCHEDULE
C-275485	4-8	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP



REV	DATE	DESCRIPTION	PREPARED	REVIEWED	APPROVED
0	12/13/2024	ISSUED FOR CONSTRUCTION			

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Sargent & Lundy  
 500 DELAWARE AVE., WILMINGTON, DE  
 PROJ. No. 13710.161

Sargent & Lundy

PROFESSIONAL CERTIFICATION: I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME AND THAT I AM A duly licensed PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF PENNSYLVANIA (LICENSE NO. PE00560). THE EXPIRATION DATE IS 03/31/2026.

DATE: 12/13/24

Signature: R. G. GENOVESE  
 RIMON E. GENOVESE  
 PROFESSIONAL ENGINEER

TABLE OF ADDITIONS & CHANGES  
 USE ONLY PRINTS SHOWING LATEST DATE

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A1	11/01/23	EC* 303558 WP* 1836036 & 19393568 SARGENT & LUNDY ADDED THIS DRAWING ISSUED FOR APPROVAL	SAL	SAL	SAL
A2	07/26/24	EC* 303558 WP* 1836036 & 19393568 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR APPROVAL	SAL	SAL	SAL
A3	12/13/24	EC* 303558 WP* 1836036 & 19393568 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR CONSTRUCTION	SAL	SAL	SAL

CIVIL 275403

PLAN AND PROFILE  
 CONOWINGO REBUILD PHASE 1 AND 2  
 FLINT TO PLYMOUTH

220-47 LINE  
 PECO Energy Company

SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	S&L	S&L	S&L			12/13/24

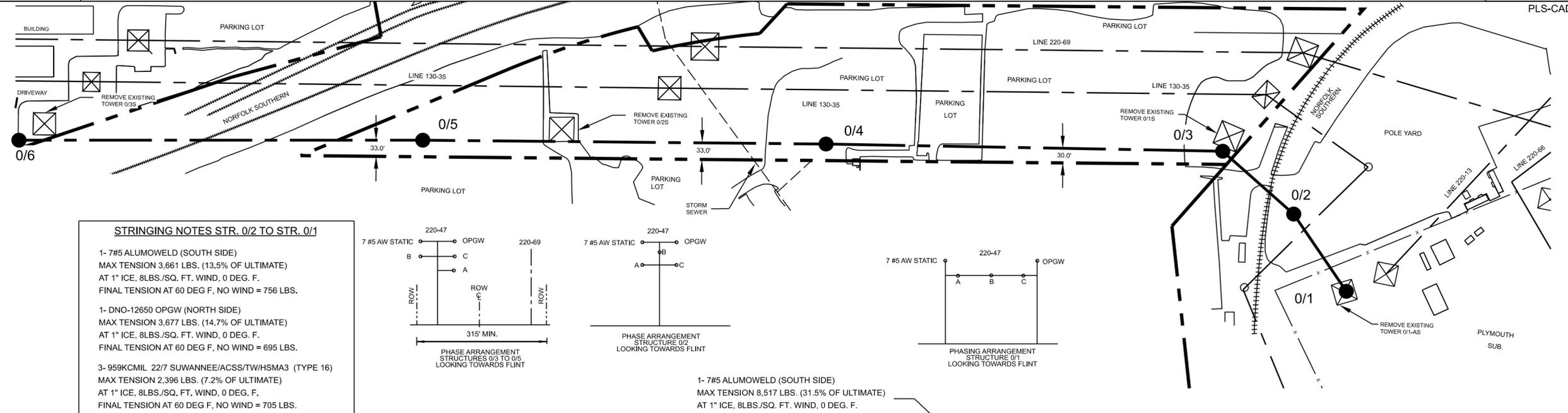
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APPROVED: \_\_\_\_\_ APPROVED: \_\_\_\_\_

SHEET 7 OF 8 C-275403-A3

PLOT SCALE 1:0  
 FILE SCALE

ELECTRICAL GRID  
 INFRASTRUCTURE SERVICES

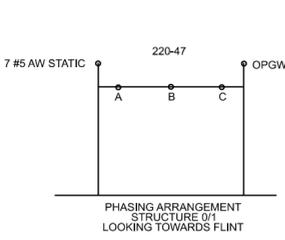
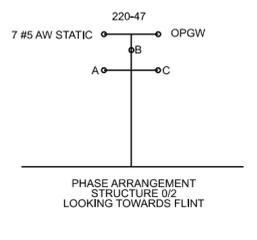
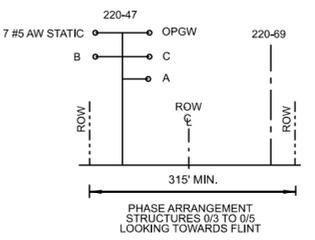


**STRINGING NOTES STR. 0/2 TO STR. 0/1**

1- 7#5 ALUMOWELD (SOUTH SIDE)  
 MAX TENSION 3,661 LBS. (13.5% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 756 LBS.

1- DNO-12650 OPGW (NORTH SIDE)  
 MAX TENSION 3,677 LBS. (14.7% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 695 LBS.

3- 959KCMIL 22/7 SUWANNEE/ACSS/TW/HMSA3 (TYPE 16)  
 MAX TENSION 2,396 LBS. (7.2% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 705 LBS.



1- 7#5 ALUMOWELD (SOUTH SIDE)  
 MAX TENSION 8,517 LBS. (31.5% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 4,941 LBS.

0/3  
 STATION: 124+01.69  
 LINE ANGLE: 40.76°  
 STR. HEIGHT: 150'  
 TYPE: 230-DE(0-45)  
 T.O.C. ELEVATION: 132.9'  
 HT. T.O.C. TO COND.: 100.3'  
 FRAMING DWG. NO.: 275490 SH. 4  
 INS. ASS'Y.: S-7310 & S-7110  
 OHSW ASS'Y.: S-7350  
 OPGW ASS'Y.: S-7402  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 2'

0/2  
 STATION: 125+91.50  
 LINE ANGLE: 14.25°  
 STR. HEIGHT: 120'  
 TYPE: UNIQUE-HORZ. DE  
 T.O.C. ELEVATION: 138.0'  
 HT. T.O.C. TO COND.: 97.0'  
 FRAMING DWG. NO.: 275406 SH. 4  
 INS. ASS'Y.: S-7310 & S-7110  
 OHSW ASS'Y.: S-7350  
 OPGW ASS'Y.: S-7402  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 2'

0/1  
 STATION: 127+79.14  
 LINE ANGLE: 9.05°  
 STR. HEIGHT: 90'  
 TYPE: SUBSTATION A-FRAME  
 T.O.C. ELEVATION: 148.1'  
 HT. T.O.C. TO COND.: 70.0'  
 FRAMING DWG. NO.: 275402 SH. 3  
 INS. ASS'Y.: S-7310  
 OHSW ASS'Y.: S-7350  
 OPGW ASS'Y.: S-7403  
 FND. DWG. NO.: 179704-01 & 179704-07  
 FND. REVEAL: 2'  
 OPGW SPLICE BOX: 275491 SH. 2

1- 7#5 ALUMOWELD (SOUTH SIDE)  
 MAX TENSION 10,834 LBS. (40.1% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 3,236 LBS.

1- DNO-12650 OPGW (NORTH SIDE)  
 MAX TENSION 10,111 LBS. (40.4% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 3,032 LBS.

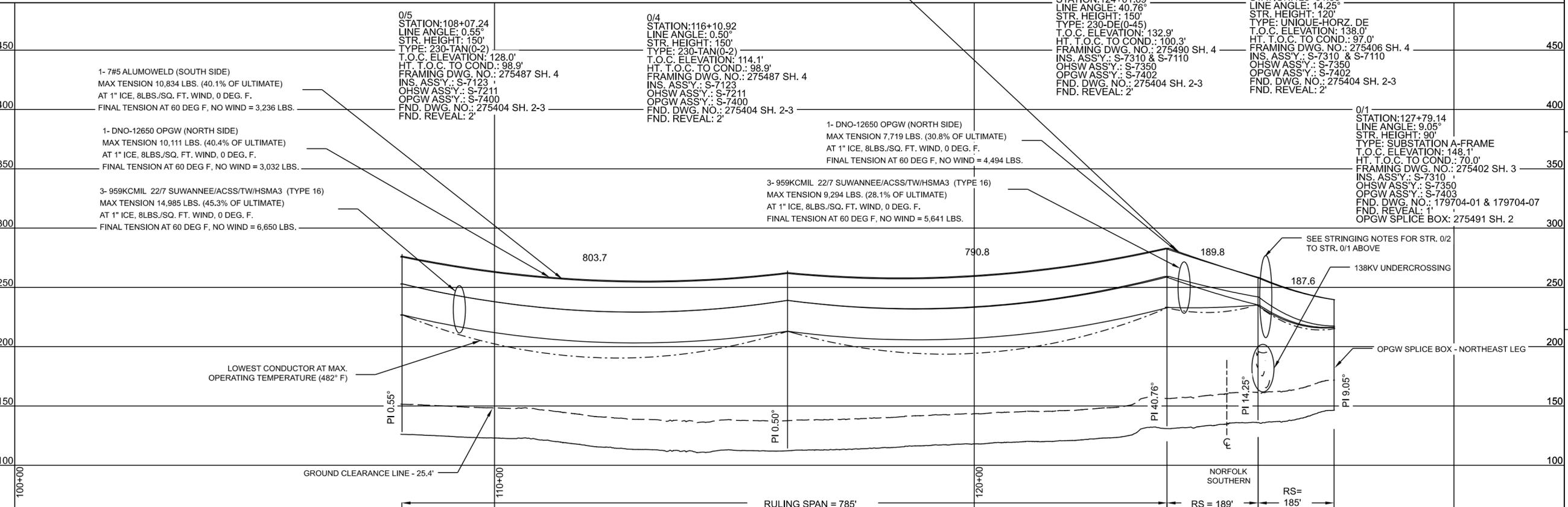
3- 959KCMIL 22/7 SUWANNEE/ACSS/TW/HMSA3 (TYPE 16)  
 MAX TENSION 14,985 LBS. (45.3% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 6,650 LBS.

0/5  
 STATION: 108+07.24  
 LINE ANGLE: 0.55°  
 STR. HEIGHT: 150'  
 TYPE: 230-TAN(0-2)  
 T.O.C. ELEVATION: 128.0'  
 HT. T.O.C. TO COND.: 98.9'  
 FRAMING DWG. NO.: 275487 SH. 4  
 INS. ASS'Y.: S-7123  
 OHSW ASS'Y.: S-7211  
 OPGW ASS'Y.: S-7400  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 2'

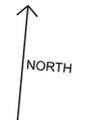
0/4  
 STATION: 116+10.92  
 LINE ANGLE: 0.50°  
 STR. HEIGHT: 150'  
 TYPE: 230-TAN(0-2)  
 T.O.C. ELEVATION: 114.1'  
 HT. T.O.C. TO COND.: 98.9'  
 FRAMING DWG. NO.: 275487 SH. 4  
 INS. ASS'Y.: S-7123  
 OHSW ASS'Y.: S-7211  
 OPGW ASS'Y.: S-7400  
 FND. DWG. NO.: 275404 SH. 2-3  
 FND. REVEAL: 2'

1- DNO-12650 OPGW (NORTH SIDE)  
 MAX TENSION 7,719 LBS. (30.8% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 4,494 LBS.

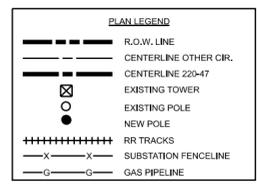
3- 959KCMIL 22/7 SUWANNEE/ACSS/TW/HMSA3 (TYPE 16)  
 MAX TENSION 9,294 LBS. (28.1% OF ULTIMATE)  
 AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.  
 FINAL TENSION AT 60 DEG F, NO WIND = 5,641 LBS.



100.0 FT. HORIZ. SCALE  
 40.0 FT. VERT. SCALE



- NOTES:**
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
  - ALL WIRES DISPLAYED AT 60° F.



**REFERENCE DRAWINGS:**

DRAWING NUMBER	SHEET	DESCRIPTION
C-275403	1	COVER SHEET
C-275403	2	STRUCTURE LIST
C-275403	3-8	PLAN & PROFILE
C-275404	1	STRUCTURE STAKING
C-275404	2-3	FOUNDATION SCHEDULE
C-275485	1-3	DAMPER SCHEDULE
C-275485	4-8	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP

REV	DATE	DESCRIPTION	PREPARED	REVIEWED	APPROVED
0	12/13/2024	ISSUED FOR CONSTRUCTION	MH	NB	NB

**Sargent & Lundy**

PROFESSIONAL CERTIFICATION, I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME AND THAT I AM A QUALIFIED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF PENNSYLVANIA. LICENSE NO. PE00820. EXPIRATION DATE: 09/30/2028.

DATE: 12/13/24

**RUMEN E. GENCHEV**  
 REGISTERED PROFESSIONAL ENGINEER  
 PENNSYLVANIA

**TABLE OF ADDITIONS & CHANGES**  
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A2	07/26/24	EC* 383558 WP* 1836036 & 19393568 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A3	12/13/24	EC* 383558 WP* 1836036 & 19393568 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

**CIVIL 275403**

PLAN AND PROFILE  
 CONOWINGO REBUILD PHASE 1 AND 2  
 FLINT TO PLYMOUTH

220-47 LINE  
 PECO Energy Company

SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	S&L	S&L	S&L	S&L		12/13/24

APPROVED \_\_\_\_\_ APPROVED \_\_\_\_\_  
 APPROVED \_\_\_\_\_ APPROVED \_\_\_\_\_

SHEET 8 OF 8 C-275403-A3

**Letter of Notification Filing Checklist**  
**PECO Conowingo 220-47 Project**

In an effort to facilitate the Commission’s review process for a Letter of Notification (LON) for the Siting and Construction of Electric Transmission Lines, the following checklist may be consulted by the applicant. The applicable regulatory requirements for a LON application are found in 52 Pa. Code §§ 57.71-77. The checklist is provided to streamline the review process by anticipating requests for additional information that may arise from Commission staff. The checklist does not create additional mandates or regulatory requirements for approval of a LON.

**1. Provide the name of the applicant and the address of its principal business office.**

PECO Energy Company  
 2301 Market Street  
 Philadelphia, PA 19103

**2. Name, title and business address of the attorney of the applicant and the person authorized to receive notice and communications with respect to the application if other than the attorney or the applicant.**

Anthony E. Gay  
 PECO Energy Company  
 Vice President & General Counsel  
 2301 Market Street  
 Philadelphia, PA 19103  
 (267) 533-1964  
[anthony.gay@exeloncorp.com](mailto:anthony.gay@exeloncorp.com)

Kenneth M. Kulak  
 Morgan, Lewis & Bockius LLP  
 2222 Market Street  
 Philadelphia, Pennsylvania 19103-2921  
 (215) 963-5384  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)

**3. General description of the proposed route of the HV line, to include the number of route miles, the right-of-way width and the location of the proposed HV line within each city, borough, town and township traversed. Describe which sections of 52 Pa. Code §57.72(d)(1)(i)-(vi) the applicant believes are applicable.**

PECO proposes to rebuild its existing 220-47 Line (the “Project”), which is a 230 kV transmission line running from Plymouth Meeting Substation to Flint Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania. The line is approximately 2.5 miles, comprised of 16 structures, and entirely located

within PECO's existing right-of-way that is approximately 315 feet wide. The Project includes the removal of fourteen lattice structures that are at end of life and rebuilding the existing 220-47 Line with nineteen new steel monopoles. Two of the existing structures will remain in place and be incorporated into the Project. Specifically, the Project will incorporate existing structure 2/3, a weathering steel monopole, and existing structure 2/4, a takeoff structure at the Flint Substation. The new 220-47 Line will have a total number of 21 structures.

220-47 Line is one of twelve circuits along the approximately 60-mile Conowingo right-of-way from the Conowingo Substation in Maryland to the Plymouth Meeting Substation. Only the 220-47 Line is within the scope of this Project and PECO will file for approvals for future projects along the Conowingo right-of-way in separate proceedings, as needed.

This application is made pursuant to two provisions of 52 Pa. Code §57.72(d)(1):

- 52 Pa. Code §57.72(d)(1)(i): An HV line which is proposed to be located entirely on an existing transmission line right-of-way, so long as the size, character design or configuration of the proposed HV line does not substantially alter the right-of-way. The Project meets this criterion because it will be constructed entirely within PECO's existing transmission line right-of-way.
- 52 Pa. Code §57.72(d)(1)(v): An HV line which is to be recondored or reconstructed so long as the size, character, design or configuration of the proposed HV line does not substantially alter the right-of-way. The Project meets this criterion because it includes only reconstructing PECO's existing transmission line, and the size, character, design, and configuration of the proposed new transmission line will not substantially alter the existing right-of-way.

**4. Provide a general statement of the need for the proposed HV line in meeting identified present and future demands for service, of how the proposed HV line will meet that need and of the engineering justification for the proposed line.**

Much of the existing 220-47 Line transmission line is 1920s vintage and thus the structures, foundations, and conductors are all nearing 100 years old and are at end of life. The Project is needed to remove the aging infrastructure and increase reliability along a critical right-of-way. The transmission line ratings will increase by over 50% for the entire Conowingo right-of-way by utilizing modern technology high-temperature-low-sag conductors. Improvements will be made to communications between substations by installing new Optical Ground Wire. Transmission outages will be used for line rebuilds and replacement of obsolete substation equipment such as relays, circuit breakers, and disconnect switches. The Project will also support the overall reliability of PECO's transmission system.

**5. Please provide an engineering assessment of the project including information to address the following:**

**a) Provide an analysis of minimum conductor clearances and conductor thermal ratings.**

Conductor clearances for the project meet or exceed the requirements of PECO’s Engineering Practice EPP-2090 OHT Design Clearances. The clearance requirement in EPP-2090 exceeds the requirements of NESC 2023. Examples of PECO clearance requirements are provided in subsection b, below.

**b) Provide engineering design criteria and parameters such as vertical clearance to ground.**

Ground, Farmland	25.4’
Roadways, driveways, parking lots	25.4’
Railroads, above top or rail	33.4’
Area not accessible by vehicles	21.4’

**c) Provide an explanation as to how the project will be in compliance with the current NESC and, where applicable, information on how the applicant’s design specifications and safety rules may exceed NESC suggested standards for transmission lines.**

The right-of-way width for the proposed project is governed by the conductor displacement due to wind with the assumption that buildings can be erected on the easement line regardless of local municipality building setback requirements. The right-of-way width provided exceeds the requirements of NESC and PECO’s Engineering Practice EPP-2090, “OHT Design Clearances” and will provide access for line maintenance, repair, and vegetation management.

**6. If applicable, provide the current height of the structures expected to be replaced, the proposed height of the new structures to be installed and the height of the structures to remain in place. Provide the number of structures proposed vs. current number of structures. Provide the location and footprint of the current structures compared to the proposed structures.**

The existing number of structures is 16. The number of proposed structures (including structures to remain and take off structures) is 21.

Reference the below table for new and proposed structure heights.

<b>Structure Number</b>	<b>Existing Structure Height (ft)</b>	<b>Proposed Structure Height (ft)</b>
-------------------------	---------------------------------------	---------------------------------------

0/1	88	90
0/2	N/A	120
0/3	90	150
0/4	N/A	150
0/5	108	150
0/6	105	160
0/7	135	160
0/8	N/A	160
0/9	145	160
1/1	N/A	170
1/2	101	170
1/3	95	155
1/4	N/A	150
1/5	85	150
1/6	88	140
1/7	100	160
2/1	90	170
2/2	109	185
2/2-1	140	180
2/3	115	N/A
2/4	65	N/A

See PECO Attachment 1, which consists of the proposed plan and profile of the project and shows the location of the proposed structures in relationship to existing structures.

- 7. If applicable, state if any properties/easements that did not previously have structures will now have a structure. State if the easement agreement allows for structures on these properties that did not previously have a structure. Explain the Company's process of informing the property owners that a structure will be placed on the easement to their property.**

No additional properties or easements are required for this Project. The new structures will be placed entirely within PECO's existing right-of-way.

- 8. If applicable, what is the PJM project ID No. for the proposed project? Has this project been submitted to the PJM Transmission Expansion Advisory Committee (TEAC)? If so, please provide a description of the project as submitted to the TEAC. If this project is part of a larger project, summarize the larger project of which the LON is a part. Please describe how this project may mitigate potential planning criteria violations.**

The PJM project ID No. for the proposed Project is s3185.1. The Project need and solution were presented to the Transmission Expansion Advisory Committee and included in the PECO Local Plan as shown below. The Project is a supplemental project addressing the need to replace transmission facilities due to the following driver:

Equipment Material Condition, Performance and Risk - Degraded equipment performance, material condition, obsolescence, equipment failure, employee and public safety and environmental impact.

The Project is not associated with PJM baseline projects that are ordered by PJM and designated to PECO to address planning criteria violations.



M-3 Process  
PECO Transmission Zone  
220-47 Plymouth Meeting – Flint 230 kV Line Rebuild

**Need Number:** PE-2023-009

**Process Stage:** Submission of Supplemental Project for inclusion in the Local Plan 4/11/2024

**Previously Presented:**

Need Meeting 10/3/23

Solutions Meeting 10/31/23

**Project Driver:**

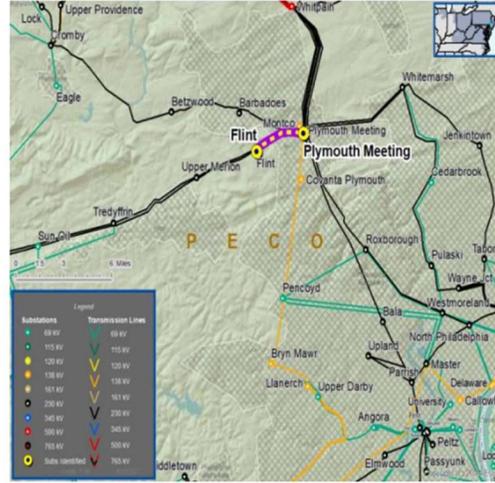
- Equipment Material Condition, Performance and Risk

**Specific Assumption Reference:**

- Transmission infrastructure replacements (EOL/condition/obsolescence) that are consistent with efficient asset management decisions

**Problem Statement:**

- The 230 kV line 220-47 Plymouth Meeting – Flint is a 2.5 mile line with 795 kcmil 30/19 ACSR conductor and 184 kcmil ACSR static wire that was constructed in 1927. This line is 96 years old and nearing end of useful life.
- There are 16 structures along this ROW, 13 of which that are the original steel lattice towers erected in 1927, which are showing signs of corrosion on the tower members, wear to vang plates, insulators, and insulator hardware.
- Inspections of the static and phase conductors identified that they were in poor condition and need to be replaced.



PECO Local Plan 2024



M-3 Process  
PECO Transmission Zone  
220-47 Plymouth Meeting – Flint 230 kV Line Rebuild

**Need Number:** PE-2023-009

**Process Stage:** Submission of Supplemental Project for inclusion in the Local Plan 4/11/2024

**Proposed Solution:**

- Rebuild approx. 2.5 miles with new dual circuit, weathering steel monopole structures and 959.6 kcmil ACSS conductor.
- Replace various substation equipment at Plymouth Meeting and Flint substations to make the conductor the limiting element.

<b>Existing ratings (MVA):</b>	SN/SE	WN/WE
220-47 Plymouth – Flint	418/519	518/597
<b>New ratings (MVA):</b>	SN/SE	WN/WE
220-47 Plymouth – Flint	762/884	799/922

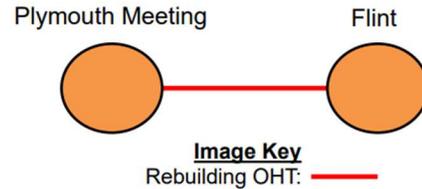
**Estimated cost:** \$18.2M

**Projected In-Service:** 12/31/25

**Supplemental Project ID:** s3185.1

**Project Status:** Engineering

**Model:** 2028 RTEP



PECO Local Plan 2024

**9. Provide a breakdown of project costs. Please explain who will own, finance and build the proposed project.**

PECO estimates the total Project cost to be \$19.8 million. Of that cost, \$4.1 million is attributed to materials (new conductor/hardware, optical ground wire, structures, foundations, substation equipment). The remaining costs are attributable to direct labor – primary engineering and design, clearance reviews, and electrical/civil construction – and

allocated to PECO overhead and management costs. PECO will own, finance, and build the proposed Project. The Department of Energy will reimburse approximately \$5 million of the above cost utilizing the Infrastructure Investment and Jobs Act funding.

**10. If available at the time the LON is filed, please provide a copy of any comments received from state or local officials.**

Not applicable; PECO has not received any comments regarding the proposed Project or this letter of notification.

**11. Please provide the anticipated construction commencement date and the proposed in-service date of the project.**

The anticipated construction commencement date is April 3, 2025, for pouring concrete foundations. The remainder of the Project requires taking a transmission outage, currently scheduled September 6, 2025, to November 11, 2025. The proposed in-service date of the Project is November 11, 2025.

**12. Provide evidence to show that the size, character, design and configuration of the proposed HV line will not substantially alter its existing right-of-way, if applicable. Please identify all alterations necessary to the existing right-of-way.**

The Project involves replacing, reframing, or installing new structures within the existing right-of-way as described in the response to Question 6. New structures will be located closer to the edge of the right-of-way. Clearances to the right-of-way's edge have been maintained according to NESC requirements described in Question 5. *See* PECO Attachment 1.

**13. A statement identifying the filing date on which the filing of the LON was or is to be made and a statement as found in 57.72(d)(iv) regarding the Commission's review.**

This Letter of Notification is being made today, December 19, 2024. PECO understands that, pursuant to 52 Pa. Code §§ 57.72(d)(4)(iv) and 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the Project will be constructed as proposed herein without the application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

**14. Provide the number of streams and/or wetlands that will be crossed. Describe how these will be addressed. Will any endangered or threatened species be affected? If a PNDI is required, please provide the results.**

The Project will cross two wetland areas and four streams including one intermittent stream. There are no proposed direct or indirect impacts to these features. Erosion and sediment control devices and best management practices will be in place to prevent sedimentation and impacts to these features.

One wetland was identified for a temporary workspace associated with pole replacement activities, which will be timber matted and restored following construction with no permanent impacts proposed.

A PNDI was required and identified a potentially threatened or endangered species in the vicinity of the Project. However, further review by the Pennsylvania Fish and Boat Commission determined that no adverse impacts are expected to the species of special concern due to the Project.

**15. Indicate the number of circuits on the proposed line. Note that if only one is being installed at this time, another LON may be needed when the second circuit is added.**

Only one circuit will be installed for the Project. PECO proposes to install a second circuit on the line during a future project but will seek all necessary approvals at that time.

**16. Please provide a copy of the certificate of service.**

The certificate of service is attached to the filing.

**17. Provide the specific NERC or other regulatory standard criteria which is driving the proposed project (e.g. TPL-004-1, P.2).**

Not applicable.

**18. Explain why the NERC, or other regulatory standard, violation, is now an issue where it wasn't previously.**

Not applicable.

**19. Explain whether the proposed project meets NERC or PJM minimum planning criteria or whether it exceeds these criteria to meet transmission owner planning**

**criteria. If the project exceeds either of these minimum planning criteria to meet transmission owner criteria, provide a detailed explanation as to why.**

The proposed Project is not driven by NERC or PJM minimum planning criteria. The Project is a supplemental project addressing the need to replace transmission facilities due to the material age and condition of the equipment and risk posed by further usage of the equipment. As such, the Project is necessary to maintain reliability by replacing transmission infrastructure before it reaches the end of its useful life and/or fails.

**20. Explain whether load growth in the area has led to any change in circumstances as it relates to the need for the proposed project. If so, quantify these load growth impacts.**

Not applicable.

**21. State the age and anticipated service life and describe the overall health of the transmission line facilities to be replaced. Additionally, include information related to conditions which may have accelerated aging or led to premature failure of the facilities (e.g. corrosive environment).**

The majority of this circuit was constructed in 1927, with the original towers, conductors, and static wire remaining in service. The service life of the new transmission monopoles and appurtenances is expected to be over sixty years. Static wires are currently experiencing end-of-life issues and 33 percent of the phase conductors were found to be in poor or marginal condition. Miscellaneous insulators, hardware, and steel lattice structural members such as static wire vang plates are also approaching end of life and are currently being replaced as corrective maintenance when identified through comprehensive aerial inspections. Galvanized coating on the lattice structures has worn away over time and the structures are now being protected with paint. Structures have not been painted since the 1990s and paint is now wearing away, exposing raw steel to the elements. Generally, structures require repainting every 20 years or replacement.

**22. Provide information regarding any unplanned outages on the subject transmission facilities over the previous 5 years (or more), including the duration, cause, whether service to customers was interrupted by outages on the subject transmission line(s), and if so, the number and type of customers which were impacted. Additionally, explain whether the proposed project would mitigate the effects of these outages.**

There have been no unplanned interruptions on the 220-47 line within the last 10 years.

**23. Explain whether alternative solutions were considered. If so, provide a brief description of the alternative(s) and provide a detailed explanation of why the chosen solution was selected.**

An alternative to replace all conductors, insulators and hardware and establish a painting program was considered. A rebuild was selected as it provides the most comprehensive update to the circuit and allows for future expansion such that the structures can be designed to current PECO standards.

**24. Explain whether any of the loads served by the transmission facilities to be replaced are considered to be critical customers.**

The 220-47 Line is an integrated part of the PJM transmission system and thus does not serve individual customers.

**25. Quantify the anticipated increase in reliability in terms of customer average interruption duration index, system average interruption duration index, and system average interruption frequency index.**

PECO considers the lifespan of a tower and fixtures to be approximately 70 years. The existing 220-47 Line towers, conductors, and static wire are at the end of life with reliability trending downwards. The new monopole structures proposed for the Project will provide an increase in reliability by eliminating existing deterioration in the 220-47 Line.

**26. If a transmission owner customer requested the proposed project and is not paying the entire cost, explain why the costs will be assumed by other transmission owner customers.**

Not applicable.

**27. Provide a detailed description of the methodology used to determine that the subject transmission facilities have reached the end of their useful service life. Additionally, provide any survival curves or utility specific data used in this determination.**

See PECO response to Question 21 above regarding end of life.

Revised October 2018

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Letter of Notification of PECO Energy :  
Company Filed Pursuant to 52 Pa. Code §§ :  
57.71 *et seq.* for Approval of the Siting and :                   Docket No. A-2024-\_\_\_\_\_**  
**Construction of the Conowingo 220-47 Line :  
Project Located in Plymouth Township and :  
Upper Merion Township, Montgomery :  
County, Pennsylvania :**

**VERIFICATION**

I, Drew T. Davis, hereby declare that I am the Vice President, Transmission and Substations for PECO Energy Company; that, as such, I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Letter of Notification are true and correct to the best of my knowledge, information, and belief; and that I make this verification subject to the penalties of 18 Pa. C.S.A. § 4904 pertaining to false statements to authorities.

DATE: 12-05-2024

  
\_\_\_\_\_  
Drew T. Davis  
Vice President, Transmission and Substations

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Letter of Notification of PECO Energy :  
Company Filed Pursuant to 52 Pa. Code § :  
57.71 et seq. for Approval of the Siting and :       Docket No. A-2024-\_\_\_\_\_**  
**Construction of the Conowingo 220-47 Line :  
Project Located in Plymouth Township and :  
Upper Merion Township, Montgomery :  
County, Pennsylvania :**

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, the parties listed below that are entitled to receive a copy of the above-captioned Letter of Notification pursuant to 52 Pa. Code § 57.74 were served by certified mail, return receipt requested, a copy of the above-captioned Letter of Notification.

Patrick M. Cicero, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place – 5th Floor  
Harrisburg, PA 17101-1921

Allison C. Kaster  
Bureau of Investigation and Enforcement  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120

NazAarah Sabree, Esq.  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101

Montgomery County Commissioners  
P.O. Box 311  
Norristown, PA 19404-0311  
Attn: Jamila Winder, President Commissioner

Montgomery County Planning Commission  
PO Box 311  
Norristown, Pa 19404-0311  
Attn: Steven N. Kline, Chair

Benjamin H. Field, Esq.  
Montgomery County Solicitor  
P.O. Box 311  
Norristown, PA 19404-0311

Michael P. Clarke, Esq.  
Plymouth Township Solicitor  
Rudolph Clarke, LLC  
350 Sentry Parkway East, Building 630  
Suite 110-A  
Blue Bell, PA 19422

Noah Marlier, Esq.  
Upper Merion Township Solicitor  
Hamburg, Rubin, Mullin, Maxwell & Lupin  
375 Morris Road, PO Box 1479  
Lansdale, PA 19446-0773

Plymouth Township  
700 Belvoir Road  
Plymouth Meeting, PA 19462  
Attn: Karen R. Bramblett, Chair

Upper Merion Township  
175 West Valley Forge Road  
King of Prussia, PA 19406-1802  
Attn: Marvin Meneeley, Chairperson

PA Department of Environmental Protection  
Market Street State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063  
Attn: Office of Field Operations

The Department of Environmental Resources  
101 S. Second Street  
Post Office Box 2357  
Harrisburg, Pennsylvania 17120  
Attn: Bureau of Environmental Planning

PA Department of Transportation  
Commonwealth Keystone Building  
400 North Street, 5th Floor  
Harrisburg, PA 17120  
Attn: Jeffery Spotts, Chief Counsel

PA Historical & Museum Commission  
Bureau for Historic Preservation  
Commonwealth Keystone Building, 2nd Fl.  
400 North Street  
Harrisburg, PA 17120-0053  
Attn: Douglass C. McLearn, Chief

PA Department of Conservation & Natural  
Resources  
Rachel Carson State Office Building  
400 Market St.  
Harrisburg, PA 17105-8767  
Attn: Rebecca Bowen, Ecological Services  
Section Chief

U.S. Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Rd, Suite 101  
State College, PA 16801-4850  
Attn: Lesa Lindsay, Administrative Officer

PA Fish and Boat Commission  
Natural Diversity Section  
450 Robinson Lane  
Bellefonte, PA 16823-9620  
Attn: Christopher A. Urban, Chief

PA Game Commission  
2001 Elmerton Avenue  
Harrisburg, PA 17110-9797  
Attn: Dr. Matthew Schnupp, Director

U.S. Army Corps of Engineers  
Baltimore District Corporate Communication  
Office  
2 Hopkins Plaza  
Baltimore, Maryland 21201  
Attn: Planning Division

Federal Aviation Administration  
Eastern Obstruction Evaluation  
10101 Hillwood Parkway  
Fort Worth, TX 76177  
Attn: Dave Maddox

Montgomery County Conservation District  
143 Level Road  
Collegeville, PA 19426  
Attn: Jessica Buck, District Manager

Dated: December 19, 2024



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