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January 9, 2025

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd 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-2024-3052612**

Dear Secretary Chiavetta:

Enclosed for filing in the above-captioned proceeding is the public version of PECO Energy Company's Responses to the Data Requests of the Bureau of Technical Utility Services, Question Nos. A-1 to A-3. PECO's responses to the data requests include the following **CRITICAL ELECTRICAL INFRASTRUCTURE INFORMATION** ("CEII"), **CONFIDENTIAL**, and **PROPRIETARY** attachments:

CEII/CONFIDENTIAL Attachment TUS-1-1

CONFIDENTIAL Attachment TUS-1-2

Attachment TUS-1-1 contains **CEII**, **CONFIDENTIAL**, and **PROPRIETARY** information and is marked "CONFIDENTIAL – CEII RESTRICTED." Attachment TUS-1-1 contains **CONFIDENTIAL** and **PROPRIETARY** information and is marked "CONFIDENTIAL." PECO requests that the materials that have been labeled "CONFIDENTIAL – CEII RESTRICTED" or "CONFIDENTIAL" be given confidential treatment by the Commission, including its various offices and bureaus. PECO also requests that the confidential materials be excluded from the Commission's public document folder and that the confidential copies not be disclosed to the public.

Copies of the public responses have been served to those indicated on the enclosed Certificate of Service. The confidential material will be sent via Federal Express to both the Secretary and Jordan Van Order as directed in the Data Requests dated December 30, 2024.

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Rosemary Chiavetta, Secretary
January 9, 2025
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If you have any questions, please call me directly at 215.963.5384.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Kenneth M. Kulak".

Kenneth M. Kulak

KMK/ap
Enclosure

c: Per Certificate of Service (w/encls.)

**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 :
Construction of the Conowingo 220-47 Line : Docket No. A-2024-3052612
Project Located in Plymouth Township and :
Upper Merion Township, Montgomery :
County, Pennsylvania :**

**RESPONSE OF PECO ENERGY COMPANY
TO DATA REQUESTS OF THE BUREAU OF TECHNICAL UTILITY SERVICES**

TUS-A-1:

Reference the Letter of Notification, Paragraph 10. Please provide a detailed description of the methodology used to determine that the subject transmission facilities have reached the end of their useful life. Additionally, provide any survival curves or utility specific data used in this determination.

RESPONSE:

As described in the Letter of Notification, the majority of the existing 220-47 Line was constructed in 1927. PECO has been monitoring the condition of the transmission structures for the approximately 60-mile Conowingo right-of-way (i.e., 12 circuits including the 220-47 Line) for decades and has conducted multiple studies to assess the end of useful life for the associated transmission facilities. In 1995, PECO conducted an analysis of the conductor and static wire of the Conowingo right-of-way circuits by using an eddy current sensor that could determine the extent of the remaining galvanizing layer protecting the conductor steel core. The analysis was conducted for all twelve circuits of the approximately 60-mile Conowingo right-of-way, including the 220-47 Line. The analysis found that the galvanizing coating on the steel cores of the 68-year-old conductor and static wire were degraded at many locations with an estimated remaining life of approximately 10 years.

PECO continued to monitor the transmission facilities in the Conowingo right-of-way after the 1995 analysis. While there have been no unplanned outages on the 220-47 Line within the last ten years, PECO performed an additional study in 2021 of the entire 60-mile right-of-way using a Kinectrics LineVue system to determine the condition of static wire and conductors along the Conowingo right-of-way. The phase conductors were tested at 12 different locations and the static wire was tested at 25 different locations. The study showed that 50% of the phase conductors and 72% of the static wire require replacement. PECO believes that the overall condition of the existing 220-47 Line conductors and static wire closely align with the overall results for the transmission facilities along the

Conowingo right-of-way as all the circuits were built at the same time and according to the same standards. The 2021 study is included as **CEII/CONFIDENTIAL** Attachment TUS 1-1.

In addition, PECO conducted a comprehensive aerial inspection in 2022 and identified a variety of defects in the 220-47 Line including hardware, insulator and vang wear,¹ foundation defects, and structures with paint peeling/chalking greater than 50%.

PECO's Accounting department estimates the expected lifespan of a lattice structure transmission tower, such as those of the existing 220-47 Line, at 70 years. PECO's Accounting department also estimates the expected lifespan of transmission conductors at 62 years. PECO is providing survival curve information included as **CONFIDENTIAL** Attachment TUS 1-2. In light of these estimates and the data on the line itself and associated equipment installed nearly 100 years ago, PECO concluded that the existing 220-47 Line structures are at end of their anticipated life.

TUS-A-2:

Reference the Letter of Notification, Paragraph 10. Please state the anticipated service life of the existing structures to be replaced.

RESPONSE:

See the response to TUS-A-1.

TUS-A-3:

Reference the Letter of Notification, Attachment 2, Item 8. The cost is not consistent with Application paragraph 6. Please explain.

RESPONSE:

PECO presented the Conowingo Project to the PJM Transmission Expansion Advisory Committee ("TEAC") in October 2023. As part of that presentation, PECO included a preliminary cost estimate at planning level plus or minus 50%, i.e., \$18.2 million as shown, in Attachment 2 Item 8. Modifications to a proposed project's cost estimate are typical as a project's design nears completion. In this instance, the proposed Project's cost estimate increased approximately \$1.6 million (approximately 8.8%) to \$19.8 million, as provided in Application paragraph 6. This amount was based on PECO's completion of approximately 90% of the design after the TEAC presentation and before filing the Letter

¹ Vang refers to the steel member with a hole in it that directly supports a shackle holding the static wire. Over time, the shackle moves and that movement, paired with the weight of the static wire, wears down the vang.

of Notification. The cost increase was driven in part by the need for additional studies and modifications to the design to address potential interactions with other circuits.

PECO's proposed replacement of the 220-47 Line is a PJM Regional Transmission Expansion Plan ("RTEP") Project.² PJM requests quarterly project updates on RTEP projects, including but not limited to, engineering progress status, cost estimates, construction updates, etc. This process recognizes that cost estimates that are originally provided to PJM are planning-level estimates that may change as the project progresses through design, engineering, and construction. These updates are then publicly posted on PJM's website.³ PECO will provide PJM the updated total project cost in its next quarterly update in February 2025.

² PJM prepares an annual RTEP that contains transmission developments needed to ensure reliable transmission service. PJM uses the RTEP process to identify system reinforcements that are required to, among other things, meet the North American Electric Reliability Corporation reliability standards, PJM reliability planning criteria, and transmission owner reliability criteria.

³ See, PJM Project Status and Cost Allocation *available at*: <https://www.pjm.com/planning/m/project-construction>.

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County, Pennsylvania :**

VERIFICATION

I, Drew T. Davis, hereby state the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

DATE: 1/9/2025



Drew T. Davis
Vice President, Transmission and Substation

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CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the **Responses of PECO Energy Company to Data Requests of the Bureau of Technical Utility Services (Public version)** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

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Dated: January 9, 2025


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