



pecoSM

AN EXELON COMPANY

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

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

PECO
2301 Market Street
S15
Philadelphia, PA 19103

February 28, 2025

Via E-Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

RE: PECO Energy Company's Electric Asset Optimization Plan Docket No. P-2020-3020974

Dear Ms. Chiavetta:

Enclosed for filing in the above referenced matter is PECO Energy Company's Electric Annual Asset Optimization Plan.

If you have any questions regarding this filing, please do not hesitate to contact me at 215-841-5777.

Sincerely,

cc: Parties of Record

PECO ENERGY COMPANY

ANNUAL ASSET OPTIMIZATION PLAN FOR 2024 - ELECTRIC OPERATIONS

Docket No. P-2020-3020974

PECO ENERGY COMPANY
ANNUAL ASSET OPTIMIZATION PLAN FOR 2024 - ELECTRIC
Docket No. P-2020-3020974

I. INTRODUCTION

On February 14, 2012, Governor Corbett signed into law Act 11 of 2012 (“Act 11”), which amended the Pennsylvania Public Utility Code in several respects, including the addition of Subchapter B (66 Pa. C.S. §§ 1350-1360). Act 11 authorized the Pennsylvania Public Utility Commission (“PUC” or “Commission”) to approve a distribution system improvement charge (“DSIC”) upon petition by an electric distribution company, a natural gas distribution company, a water utility, or a wastewater utility. A DSIC authorizes a utility to recover the reasonable and prudent costs incurred to repair, improve, or replace eligible property that is part of the utility’s distribution system. The DSIC allows utilities to recover the costs of DSIC-eligible property that is placed in service between base rate cases and, therefore, is not included in the existing revenue requirement being recovered in the utility’s base rates.

In addition, Subchapter B sets forth various requirements that must be satisfied by a qualifying utility in order to establish a DSIC and to recover the reasonable and prudent costs to repair, improve or replace eligible property.

On August 2, 2012, the Commission entered its *Final Implementation Order in Implementation of Act 11 of 2012* at Docket No. M-2012-2293611 (“Implementation Order”). The Implementation Order sets forth the Commission's expectations with regard to: 1) a Long Term Infrastructure Improvement Plan (“LTIIIP”), which must be filed as a precursor to a request to establish a DSIC (66 Pa.C.S. § 1352); and 2) Annual Asset Optimization Plans (“AAO Plans”

or “AAOP”), which must be filed each year by a utility that has an approved DSIC and LTIP (66 Pa.C.S. § 1356).

According to the Implementation Order, AAO Plans are intended to provide an overall status report regarding a utility's progress in making infrastructure improvements pursuant to a Commission-approved LTIP (Implementation Order at 30). AAO Plans are expected to: 1) demonstrate LTIP compliance and progress; and 2) identify a utility's near-term construction projects that will be funded by the DSIC, consistent with the LTIP.

On May 22, 2014, 52 Pa. Code Section 121.6 was adopted, which requires AAO Plan elements to include: (1) a description of all eligible property repaired, improved and replaced in the immediately preceding 12-month period pursuant to the utility's LTIP; and (2) a detailed description of all the facilities to be improved in the upcoming 12 months.

II. PECO's Electric LTIP

A. LTIP I (2016-2020)

On March 27, 2015, PECO filed for *Approval of its Electric Long Term Infrastructure Improvement Plan and to Establish a Distribution System Improvement Charge for its Electric Operations* at Docket No. P-2015-2471423. PECO's LTIP was a five-year plan spanning the years 2016-2020. It was designed to accelerate infrastructure improvements in order to enhance system resiliency and reliability. The plan consisted of three main project areas and a fourth category related to unreimbursed facility relocations: 1) Storm Hardening and Resiliency Measures; 2) Underground Cable Replacements; 3) Building Substation Retirements; and 4) Facility Relocations. During the 5-year LTIP period, PECO's increased expenditures were anticipated to amount to \$324.3 million, with \$274.3 million for the above reliability projects and \$50 million for facility relocation work as permitted by 66 Pa. Code Section 1351 (definition

of “eligible property”). On October 22, 2015, the PUC approved PECO’s electric LTIIIP and DSIC petition.¹ PECO’s LTIIIP I plan ended on December 31, 2020.

B. LTIIIP II (2021-2025)

On July 22, 2020, PECO filed for *Approval of its [Second] Electric Long Term Infrastructure Improvement Plan* at Docket No. P-2020-3020974 (“LTIIIP II”). PECO’s LTIIIP II is a five-year plan spanning the years 2021-2025. It is designed to accelerate infrastructure improvements in order to enhance system resiliency and reliability. The plan consists of three main project areas and a fourth category related to unreimbursed facility relocations: 1) Storm Hardening and Resiliency; 2) Underground Cable Replacements; 3) Substation Switchgear Replacement; and 4) Facility Relocations. During the five-year LTIIIP II period, PECO’s increased expenditures are estimated to be \$1.44 billion, with \$1.36 billion for the above reliability projects and \$75 million for facility relocation work. On November 19, 2020, the PUC approved PECO’s electric LTIIIP II Plan.

PECO hereby provides its AAO Plan for 2024 and is filing copies of this AAO Plan with the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and other interested parties in Docket No. P-2020-3020974.

III. REQUIRED ELEMENTS OF THE AAO PLAN

A. Description of all Eligible Property Repaired, Improved, and Replaced in the Immediately Preceding 12-Month Period Pursuant to PECO's LTIIIP II

¹ The DSIC was approved subject to two issues referred to the Office of Administrative Law Judge for hearing: 1) whether the DSIC should apply to transmission voltage rates; and 2) what revenues associated with PECO’s tariff riders should be recovered through the DSIC. (*See* the Commission’s Opinion and Order, issued October 22, 2015, in Docket No. P-2015-2471423). On September 21, 2017, the Commission approved the Joint Petition for Settlement, which resolved the issues described above.

Exhibit A² attached hereto provides summary data with respect to projects that were completed in LTIIIP II year 2024 for: 1) Storm Hardening and Resiliency Programs, 2) Underground Cable Replacement Programs, 3) Substation Switchgear Replacement Program, and 4) Facility Relocations (as specified below). In 2024, PECO spent approximately \$226.6 million on the LTIIIP II program areas described below compared to \$294.9 million estimated in the LTIIIP II for 2024 (excluding Facility Relocations), which included execution of all 2024 projects, as well as substantial efforts to continue engineering and construction on planned 2025 electric LTIIIP II projects – primarily for Building Substation and the Switchgear Replacement Programs. PECO met or exceeded its 2024 scope commitments for the majority of planned LTIIIP II work categories (i.e., Customers Experiencing Multiple Interruptions (“CEMI”) Areas, CEMI Targeted Circuits, Aerial Infrastructure Resiliency (“AIR”) Areas, AIR Targeted Assets, Building Substation Retirement, Circuit Rebuilds Enabling Unit Substation Retirements, and Underground Residential Development (“URD”) cable replacements). The Main Stem Cable Replacement Program is still recovering from previously experienced material delays and permitting issues from the COVID-19 pandemic. As a result, PECO did not meet the scope commitment as outlined in the LTIIIP II target. Lastly, due to an expanded scope of the Crescentville substation switchgear replacement project, the timing of the replacement of the units has shifted from what was included in LTIIIP II.

Additionally, the programs outlined within LTIIIP II have supported and increased job opportunities within Southeastern Pennsylvania. The following equivalent full-time employees and contracting resources gained employment due to LTIIIP II Programs:

² Exhibit A also details estimated LTIIIP II spend in 2025.

	PECO Equivalent Full-Time Employees	Equivalent Full-Time Contracting Resources
1/1/2021 – 12/31/2021	46	140
1/1/2022 – 12/31/2022	67	184
1/1/2023 – 12/31/2023	65	159
1/1/2024 – 12/31/2024	78	233

1. Storm Hardening and Resiliency Programs

a. Customers Experiencing Multiple Interruptions (“CEMI”) Programs

i. CEMI Areas

As shown in Exhibit A, PECO met its 2024 LTIIIP II goals for CEMI Areas. The LTIIIP II estimated that PECO would complete between eight and thirteen CEMI Areas projects, and actual results were eight. The CEMI Areas projects were completed in the following locations:

County	Number of Projects
Bucks	2
Chester	4
Delaware	2

The projects reduced the impact of storm conditions in these counties and involved: 1) replacing open wire and self-supporting cable installations with three-phase and single-phase spacer cable installations; 2) installing tree-resistant wire in heavily vegetated areas; 3) conversion and retirement of obsolete equipment; and 4) extending 34kV and 13kV facilities to create sectionalizing loops. In addition, PECO began preliminary CEMI Areas work planned for 2025 (i.e., detailed project design, vegetation management, and preliminary construction) in Bucks, Chester, Delaware, and Montgomery counties. In 2024, PECO spent \$7.6 million on these CEMI Areas projects compared to the \$13.5 million estimated in the LTIIIP II.

ii. CEMI Targeted Circuits

As shown in Exhibit A, PECO met its 2024 LTIP II goals for CEMI Targeted Circuits. The LTIP II estimated that PECO would complete three to four CEMI Targeted Circuits projects and actual results were three. The CEMI Targeted Circuits projects were completed in the following locations:

County	Number of Projects
Chester	2
Delaware	1

The projects reduced the impact of storm conditions in these counties and involved: 1) installing sectionalizing devices; and 2) installing aerial cable & tree-resistant wire in heavily vegetated areas. Additionally, PECO began preliminary CEMI Targeted Circuits work planned for 2025 (i.e., detailed project design, vegetation management and preliminary construction) in Bucks, Chester, and Montgomery counties. In 2024, PECO spent \$6.6 million on these CEMI Targeted Circuits projects compared to the \$7.2 million estimated in the LTIP II.

b. Aerial Infrastructure Resiliency (“AIR”) Programs

i. AIR Areas

As shown in Exhibit A, PECO met its 2024 LTIP II goals for AIR Areas. The LTIP II estimated that PECO would complete between two and five AIR Areas projects and actual results were three. The AIR Areas projects were completed in the following locations:

County	Number of Projects
Bucks	2
Chester	1

The projects reduced the impact of storm conditions in these counties and involved replacing crossarms, poles, insulators, connectors, and cutouts.³ The replaced infrastructure is designed to withstand wind and ice loading consistent with the Grade B construction guidelines defined by the National Electric Safety Code. Additionally, PECO began preliminary AIR Areas work planned for 2025 (i.e., detailed project design, vegetation management, and preliminary construction) in Bucks, Chester, Montgomery, and Philadelphia counties. In 2024, PECO spent \$5.3 million on these AIR Areas projects compared to the \$5.2 million estimated in the LTIP II.

ii. AIR Targeted Assets

As shown in Exhibit A, PECO met its 2024 LTIP II goals for AIR Targeted Assets. The LTIP II estimated that PECO would replace between 6,600 and 7,600 assets and actual results were 7,123 assets.⁴ The AIR Targeted Assets replacements were completed in the following locations:

County	Number of Assets Replaced
Bucks	372
Chester	543
Delaware	570
Montgomery	892
Philadelphia	4,622
York	124

The projects reduced the impact of storm conditions in these counties and involved replacing poles, crossarms, insulators, connectors, switches, and cutouts. Additionally, PECO began preliminary AIR Targeted Assets work planned for 2025 (i.e., detailed project design,

³ A cutout is a combination of a fuse and switch used to protect overhead primary power feeder lines and taps from surges and overloads.

⁴ The annual asset ranges initially filed with PECO’s LTIP II Plan were based on the number of poles. Consistent with the 2021 AAOP, the Company included qualifying aerial infrastructure as part of the asset count and will continue this practice in future AAOPs.

vegetation management, and preliminary construction) in Bucks, Chester, Delaware, Montgomery, Philadelphia, and York counties. In 2024, PECO spent \$21.4 million on these AIR Targeted Assets replacements compared to the \$71.0 million estimated in the LTIIIP II.

iii. Building Substation Retirement

As part of the electric LTIIIP II, PECO has committed to accelerating the retirement of obsolete building substations and all associated equipment operating at 4kV. In 2024, the Upper Darby 4kV Substation was retired and replaced with 13kV infrastructure. In 2024, PECO continued civil construction and began aerial conversion work for the Overbrook 4kV Substation retirement in Philadelphia County. In 2025, PECO will continue civil and aerial construction for the Overbrook 4kV Substation. Overall reliability will be improved by creating new 13kV circuit breakdowns, installing new reclosers, and retiring obsolete equipment. In 2024, PECO spent \$14.2 million on Building Substation Retirements compared to the \$14.0 million estimated in the LTIIIP II.

iv. Circuit Rebuild Enabling Unit Substation Retirements

As shown in Exhibit A, PECO met its LTIIIP II goal for Circuit Rebuild Enabling Unit Substation Retirements. The LTIIIP II estimated that PECO would rebuild eight to ten circuits supplied by Unit Substations and actual results were eight. The retirements were completed in the following locations:

County	Number of Units Retired
Chester	2
Montgomery	3
Philadelphia	3

The associated circuits with these substations were rebuilt and converted to 13kV or 34kV. Additionally, PECO began substantial preliminary Circuit Rebuild work for 2025 (i.e.,

detailed project design, vegetation management, civil construction, and electrical construction) in Bucks, Chester, Delaware, and Montgomery counties. In 2024, PECO spent \$46.3 million for all Circuit Rebuild work compared to the \$46.0 million estimated in the LTIIIP II.

2. Underground Cable Replacement Programs

a. Main Stem Cable Replacements

Due to supply chain delays experienced in 2023 and permitting issues experienced in 2024, PECO did not meet its LTIIIP II goal for Main Stem cable replacements for LTIIIP II year 2024. The LTIIIP II estimated that PECO would replace between 38 and 48 miles of Main Stem cable and actual results were approximately 21 miles. Main Stem cable was replaced in the following locations:

County	Miles Replaced
Chester	1.9
Delaware	1.0
Montgomery	7.6
Philadelphia	10.0

Additionally, PECO began preliminary Main Stem work planned for 2025 (i.e., detailed project design, material procurements, and preliminary construction) in Bucks, Chester, Delaware, Montgomery, and Philadelphia counties. For 2024, PECO spent \$34.6 million on its Main Stem cable replacements compared to the \$43.0 million estimated in the LTIIIP II.

b. Underground Residential Development (“URD”) Cable Replacements

As shown in Exhibit A, PECO met its 2024 LTIIIP II goal for URD cable replacements. The LTIIIP II estimated that PECO would replace 160 to 180 miles of URD cable and actual results were approximately 163 miles. URD cable replacements occurred in the following locations:

County	Miles Replaced
Bucks	62.5
Chester	36.0
Delaware	30.7
Montgomery	29.3
Philadelphia	4.6

PECO also began URD work planned for 2025 (i.e., detailed project design and preliminary construction) in Chester, Delaware, Bucks, Montgomery, and Philadelphia counties. In 2024, PECO spent \$74.0 million on URD cable replacements compared to the \$90.0 million estimated in the LTIIIP II.

3. Switchgear Replacement Program

As part of the LTIIIP II filing, PECO selected the Crescentville substation switchgear project to fulfill the commitment to complete the replacement of two to three units for an estimated total cost of \$21.0 million (\$5.0 million in 2024). For Crescentville, the addition of associated equipment and unforeseen field issues have led to an increased cost and timeline. The total cost of the project is now estimated to be \$39.3 million with scheduled completion in 2027. For LTIIIP II tracking, the two units expected to be completed by end of 2024 will now be completed by the end of 2026. The total project will be completed in 2027, with four units completed and ancillary major equipment upgrades made to three additional indoor switchgears and two power transformers. Although the timeline has been delayed, PECO expects to complete four switchgear replacements, which is above its original commitment of two to three replacements. PECO spent \$16.6 million to begin construction for the switchgear and transformer replacement, and in 2025, PECO plans to continue the construction of the switchgear and transformer replacement.

4. Facility Relocation

Facility Relocations involve unreimbursed costs related to highway relocation projects that are eligible for recovery under 66 Pa. Code. Sections 1351 and 1353. These costs arise when PECO moves its facilities at the direction of the State, Municipality, or other Governmental Agency performing public or roadway improvement projects within its Right of Way. Because these projects are reactive in nature, PECO's LTIIIP II did not include a projected number of relocations. PECO continued design efforts and the relocation of its facilities in support of PennDOT's improvements along the I-95 corridor (approximately \$9.9 million) and State Route 3010 (approximately \$1.4 million) through the Philadelphia area. Within Montgomery County, in support of the rehabilitation of Ridge Pike, PECO spent approximately \$2.0 million in design and construction costs. Approximately \$6.5 million was spent on smaller type PennDOT and Municipal projects throughout PECO's service territory.

In 2024, PECO spent \$19.8 million on Facility Relocations compared to the \$15.0 million estimated in the LTIIIP II filing (and the \$30.6 million estimated based on projects scheduled at the time of the filing of the prior year's AAOP).

B. Description of the Facilities to be Improved in the Upcoming 12-Month Period (2025)

PECO expects to meet or exceed its LTIIIP II goals/targets for 2025 (as specified below and in Exhibit A) apart from the Main Stem Cable Replacement Program. As filed, PECO estimated a total of approximately \$310.0 million for LTIIIP II projects (including Facility Relocation) in 2025. From an overall financial perspective, PECO now estimates that it will spend approximately \$315.8 million on the following LTIIIP II projects in 2025.

1. Storm Hardening and Resiliency Programs

a. Customers Experiencing Multiple Interruptions Programs

i. CEMI Areas

PECO expects that it will meet or exceed its goal to complete between eight and thirteen CEMI Areas projects in 2025, with an LTIP II-filed amount of \$13.8 million and at an estimated cost of \$13.5 million. The majority of the 2025 CEMI Areas projects will be in Bucks, Chester, Delaware, and Montgomery counties. These projects will focus on 4kV to 13kV or 34kV conversions, spacer cable, tree wire installations, and Hendrix installations.

ii. CEMI Targeted Circuits

PECO expects that it will meet or exceed its goal to complete between three and four CEMI Targeted Circuits projects in 2025, with an LTIP II-filed amount of \$7.4 million and at an estimated cost of \$7.4 million. The 2025 CEMI Targeted Circuits projects will be in Bucks, Chester, and Montgomery counties. These projects will focus on spacer cable, main cable installations, and sectionalizing existing circuits.

b. Aerial Infrastructure Resiliency Programs

i. AIR Areas

PECO expects that it will meet or exceed its goal to complete between two and five AIR Areas projects in 2025, with an LTIP II-filed amount of \$5.3 million and an estimated cost of \$4.3 million. The 2025 AIR Areas projects will be in Bucks, Chester, Montgomery, and Philadelphia counties. These projects will focus on the replacement of aerial infrastructure, including poles, overhead conductors, crossarms, insulators, connectors, and cutouts in areas served by one or more circuits.

ii. AIR Targeted Assets

PECO expects that it will meet or exceed its goal to complete between 6,600 and 7,600⁵ AIR Targeted Assets replacements in 2025, with an LTIP II-filed amount of \$71.0 million and at an estimated cost of \$32.8 million. The 2025 AIR Targeted Assets are focused across the entire PECO service territory. The asset replacements focus on aerial infrastructure, including poles, crossarms, insulators, connectors, switches, and cutouts. As PECO has updated its AIR Targeted Assets program to account for equipment beyond poles, it anticipates meeting or exceeding its unit goal at the lower estimated budget.

iii. Building Substation Retirement

PECO will continue construction on the multi-year Overbrook Building Substation project in 2025, with an LTIP II-filed amount of \$14.0 million and at an estimated cost of approximately \$26.8 million. This work will include completing underground & overhead electrical construction and converting all load from the Overbrook Building Substation by the end of year 2025.

iv. Circuit Rebuild Enabling Unit Substation Retirements

PECO expects that it will meet or exceed its LTIP II goal to retire between eight and ten Unit Substations and rebuild the associated circuits (i.e., obsolete 4 kV circuits) in 2025, with an LTIP II-filed amount of \$46.0 million, and our plan for 2025 is to retire up to 19 unit substations at an estimated cost of \$71.7 million. This ramp-up will put us in a better position to achieve our commitment to retire all unit substations within approximately 30 years as outlined in the LTIP II filing. These projects will be in Chester, Delaware, Montgomery, and Philadelphia counties.

⁵ See footnote 4, *infra*.

2. Underground Cable Replacement

a. Main Stem Cable Replacements

Due to recovering from previously experienced supply chain issues, PECO anticipates continuing Main Stem cable replacement challenges in 2025. PECO plans to replace 25–35 miles of Main Stem cable in lieu of the LTIIIP II-filed amount of 40–50 miles. This program had an LTIIIP II-filed amount of \$45.0 million, and PECO now projects \$37.2 million in spend in 2025.⁶ PECO will rebuild Main Stem primary and secondary infrastructure in Chester, Delaware, Montgomery, and Philadelphia counties.

In its LTIIIP II filing, the Company identified that potential business operation disruptions for manufacturers of distribution equipment could compromise the manufacturing and delivery supply chain for materials needed to complete PECO’s capital improvement projects. As a result of supply chain delays, Main Stem cable has experienced a significant increase in lead time. The Company continues to leverage existing relationships and monitor the ongoing supply chain issues.

b. Underground Residential Development Cable Replacements

PECO expects that it will meet or exceed its goal to replace between 165 and 185 miles of URD cable in 2025, with an LTIIIP II-filed amount of \$92.0 million and at an estimated cost of \$75.6 million.⁷ PECO will upgrade URD systems in Bucks, Chester, Delaware, Montgomery, and Philadelphia counties.

⁶ PECO has reviewed and updated the unit cost for both the Main Stem Cable Replacement and Underground Residential Development Cable Replacement programs since the analysis performed and outlined in the LTIIIP II Filing.

⁷ See footnote 6, *infra*.

3. Switchgear Replacement Program

PECO's LTIP II-filed amount was \$0.5 million, and the Company estimates that it will spend \$15.8 million in 2025 for the expanded scope of the Substation Switchgear Replacement Program to continue construction for the two switchgear busses to be replaced by 2026 and two additional switchgear busses to be replaced by 2027.

4. Facility Relocation

For 2025, PECO's LTIP II-filed amount was \$15.0 million, and the Company estimates that it will spend \$30.7 million on Facility Relocations based on currently scheduled projects. A few key projects PECO will continue to work on in 2025 with PennDOT are: I-95 corridor improvements (approximately \$3.3 million) and SR 3010 – Market Street Bridge (approximately \$4.7 million). PECO will also continue to work with Montgomery County on Ridge Pike (approximately \$2.5 million).

EXHIBIT A

LTIP II

<i>Million \$</i>	<i>2024 LTIP</i>	<i>2024 Actual</i>	<i>2025 LTIP</i>	<i>2025 Forecast</i>
Customers Experiencing Multiple Interruptions (CEMI) Areas	\$13.5	\$7.6	\$13.8	\$13.5
Customers Experiencing Multiple Interruptions (CEMI) Targeted Circuits	\$7.2	\$6.6	\$7.4	\$7.4
Aerial Infrastructure Resiliency Areas	\$5.2	\$5.3	\$5.3	\$4.3
Aerial Infrastructure Resiliency Targeted Assets	\$71.0	\$21.4	\$71.0	\$32.8
Building Substation Retirement	\$14.0	\$14.2	\$14.0	\$26.8
Circuit Rebuild for Unit Substation Retirements	\$46.0	\$46.3	\$46.0	\$71.7
Main Stem Cable	\$43.0	\$34.6	\$45.0	\$37.2
URD Cable	\$90.0	\$74.0	\$92.0	\$75.6
Switchgear Replacement Program	\$5.0	\$16.6	\$0.5	\$15.8
Facility Relocation*	\$15.0	\$19.8	\$15.0	\$30.7
Total	\$309.9	\$246.4	\$310.0	\$315.8

<i>Units</i>	<i>2024 LTIP</i>	<i>2024 Actual</i>	<i>2025 LTIP</i>	<i>2025 Forecast</i>
Customers Experiencing Multiple Interruptions (CEMI) Areas (Projects)	8 – 13	8	8 – 13	8 – 13
Customers Experiencing Multiple Interruptions (CEMI) Targeted Circuits (Projects)	3 – 4	3	3 – 4	3 – 4
Aerial Infrastructure Resiliency Areas (Projects)	2 – 5	3	2 – 5	2 – 5
Aerial Infrastructure Resiliency Targeted Assets (Assets)	6,600 – 7,600	7,123	6,600 – 7,600	6,600 – 7,600
Building Substation Retirement	1	1	1	1
Circuit Rebuild for Unit Substation Retirements (Units)	8 – 10	8	8 – 10	8– 19
Main Stem Cable (Miles)	38 – 48	20.6	40 – 50	25 – 35
URD Cable (Miles)	160 – 180	163.1	165 – 185	165 – 185
Switchgear Replacement Program	2 – 3	0	0	0
Facility Relocation*	0	0	0	0

*The eligible property, type of work, and schedules comprising facility relocation projects are driven by the construction plans of PennDOT, the Pennsylvania Turnpike Commission, and local municipalities.

VERIFICATION

I, Vincent Cuce, hereby declare that I am Director of Engineering in Technical Services 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 Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. § 4904 pertaining to false statements to authorities.

Date: February 28, 2025



Vincent Cuce
Director of Engineering

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF :
ITS ELECTRIC LONG TERM : Docket No. P-2020-3020974
INFRASTRUCTURE :
IMPROVEMENT PLAN :

CERTIFICATE OF SERVICE

I certify and affirm that I have this day served a copy of the *2024 Annual Asset Optimization Plan relating to PECO Energy Company's Electric Long Term Infrastructure Improvement Plan*, in the above-referenced docket, on the following persons in the matter specified with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

Darryl Lawrence
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
dlawrence@paoca.org

NazAarah Sabree
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
ra-sba@pa.gov

Allison Kaster
Director and Chief Prosecutor
Bureau of Investigation and Enforcement
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
akaster@pa.gov

Paul T. Diskin, Director
Bureau of Technical Utility Services
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
pdiskin@pa.gov

Charis Mincavage
McNees, Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17101
cmincavage@mcneeslaw.com
Counsel for PAIEUG

Arthur Z. Schwartz
Advocates for Justice, CA
c/o Schwartz, Lichten & Bright
225 Broadway, Suite 1902
New York, NY 10007
aschwartz@advocatesny.com
*Counsel for Pennsylvania Communities
Organizing for Change*

Charles T. Joyce
Spear Wilderman, P.C.
230 South Broad Street, Suite 1400
Philadelphia, PA 19102
ctjoyce@spearwilderman.com
*Counsel for Local 614 – International
Brotherhood for Electric Workers*

Laura Antinucci
Deputy City Solicitor,
Regulatory Law Unit
City of Philadelphia Law Department
One Parkway Building
1515 Arch Street, 16th Floor
Philadelphia, PA 19102-1596
Laura.Antinucci@phila.gov
Counsel for City of Philadelphia

Robert W. Ballenger
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102-2505
rballenger@clsphila.org
Counsel for TURN, et al.

Todd S. Stewart
HMS Legal LLP
501 Corporate Circle, Suite 302
Harrisburg, PA 17110
tsstewart@hmslegal.com
Counsel for Dominion Energy Solutions

Philip L. Hinerman
Fox Rothschild LLP
2000 Market Street, 20th Floor
Philadelphia, PA 19103-3222
phinerman@foxrothschild.com
*Counsel for Philadelphia
Housing Authority*

Eric B. Martin
Lisa R. Crabtree
Legal Department
Dominion Energy Solutions
120 Tredegar Street
Richmond, Virginia 23219
Eric.B.Martin@dominionenergy.com
Lisa.R.Crabtree@dominionenergy.com
Counsel for Dominion Energy Solutions

Donald R. Wagner
Linda R. Evers
Michael A. Gruin
Stevens & Lee
111 North Sixth Street
Reading, PA 19601
donald.wagner@stevenslee.com
linda.evers@stevenslee.com
michael.gruin@stevenslee.com
*Counsel for the Commercial
Group (BJ's Wholesale Club, Inc.,
Sam's East, Inc. and Wal-Mart Stores
East, LP)*

Jessica O'Neill
Senior Attorney
Citizens for Pennsylvania's Future
610 North Third Street
Harrisburg, PA 17101
oneill@pennfuture.org
Counsel for PennFuture



Caroline Choi (Pa. No. 320554)
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103-2921
267.533.1775 (bus)
Caroline.Choi@exeloncorp.com

Dated: February 28, 2025

*Assistant General Counsel for PECO Energy
Company*