

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17120**

Public Meeting held March 27, 2025

Commissioners Present:

Stephen M. DeFrank, Chairman
Kimberly Barrow, Vice Chair, Statement
Kathryn L. Zerfuss
John F. Coleman, Jr.
Ralph V. Yanora

Letter of Notification of PECO Energy Company
for approval to construct the Conowingo 220-47
230 kV Transmission Line Project located in
Plymouth and Upper Merion Townships,
Montgomery County, Pennsylvania

Docket Number:
A-2024-3052612

ORDER

BY THE COMMISSION:

On December 19, 2024, PECO Energy Company (PECO), Utility Code 110550, filed a Letter of Notification pursuant to 52 Pa. Code § 57.72(d)(1)(vi) of the Pennsylvania Public Utility Commission's (Commission) transmission line siting regulation. For the reasons expressed in this Order, the Letter of Notification is approved.

Copies of the Letter of Notification were served in accordance with Section 57.72(d)(3) and 57.74(b) & (c), 52 Pa. Code §§ 57.72(d)(3), 57.74(b) & (c). No protests were filed. No hearings were held.

PECO requests approval to reconstruct the Conowingo 220-47 230 kV Transmission Line Project located in Plymouth and Upper Merion Townships, Montgomery County, Pennsylvania. The Conowingo 220-47 230 kV line is supported on 16 transmission structures, extends approximately 2.5 miles, and connects the existing Plymouth Meeting Substation to the existing Flint Substation. Application ¶11.

PECO submits that the reconstruction of the Conowingo 220-47 230 kV Transmission Line Project is necessary due to the age and condition of the existing line. PECO also submits that much of the existing 220-47 transmission line was constructed in the 1920s, and that the anticipated life of a lattice structure, such as those on the 220-47 line, is approximately 70 years and the anticipated service life of the conductor is approximately 62 years. Finally, PECO submits that at nearly 100 years of service, the structures, foundations, and conductors on the 220-47 230kV line are at end of life. Application ¶10 and PECO Data Request Response No. 1.

PECO states that in 1995, it conducted an analysis of the conductor and static wire of the Conowingo right-of-way circuits to determine the extent of the remaining galvanizing layer protecting the conductors' steel core. PECO also states that 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 states that it performed an additional study in 2021 of the entire 60-mile right-of-way to determine the condition of static wire and conductors along the Conowingo right-of-way. PECO further states that the phase conductors were tested at 12 different locations and the static wire was tested at 25 different locations. PECO states that the study

showed that 50% of the phase conductors and 72% of the static wire require replacement. Lastly, PECO states that it conducted a comprehensive aerial inspection in 2022 and identified a variety of defects in the 220-47 Line including hardware, insulator, foundation defects, and structures with paint peeling greater than 50%. PECO Data Request Response No. 1.

PECO submits that to address this issue it will rebuild the Conowingo 220-47 230 kV Transmission Line and that the rebuild consists of removing the existing conductors and all but two of the existing transmission structures and reconstructing the line as well as updating obsolete relays, circuit breakers, and switches at Plymouth Meeting Substation and Flint Substation. Lastly, PECO submits that the project was presented at the PJM Regional Transmission Expansion Advisory Committee meeting in October 2023 and subsequently assigned supplemental project identification number s3185.1. Application ¶12 and Attachment 2, Item 8.

PECO states that the new 230 kV transmission line conductors will be supported on nineteen new steel monopoles. PECO also states that the project will also include the removal of fourteen existing lattice structures. PECO states that the new structures will range from approximately 90 feet-in-height to approximately 185 feet-in-height and that existing structures to be removed range from approximately 65 feet-in-height to approximately 145 feet-in-height. PECO states that the new conductors for the line will consist of 3-959kcmil 22/7 Suwanee/ACSS/TW/HSMA3 (TYPE 16). Lastly, PECO states that the Conowingo 220-47 line will be located entirely within existing right-of-way and that the right-of-way is approximately 315 feet-in-width. Application ¶¶11-12 and Attachment 2, Item 6.

PECO asserts that the Conowingo 220-47 230 kV line project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable

National Electrical Safety Code minimum standards and all applicable legal requirements. Application ¶16.

PECO states that the total estimated cost for the Conowingo 220-47 project is approximately \$19.8 million and that PECO will assume all costs. PECO also states that the Department of Energy has committed to reimburse PECO approximately \$5 million of the cost through the Infrastructure Investment and Jobs Act. Finally, PECO states that construction of the project is anticipated to commence in April 2025 with a proposed in-service date of November 2025. Application ¶¶6-7.

Section 57.72 authorizes the abbreviated Letter of Notification siting application process in lieu of an application for the following:

- (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.
- (ii) An HV line which is proposed to be located entirely within a public road.
- (iii) An HV line which is proposed to be located entirely within applicant's existing transmission line right-of-way and the property of the sole customer to be served by the line, so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.
- (iv) A line for which the voltage is proposed to be increased above its present levels so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.

- (v) An HV line which is to be reductored or reconstructed so long as the size, character, design or configuration of the proposed HV line does not substantially alter the right-of-way.

- (vi) An HV line having a proposed route of 2 miles or less.

52 Pa. Code § 57.72(d).

We agree with PECO that the formal PECO Letter of Notification and manner in which it was filed conforms to the requirements of 52 Pa. Code § 57.72(d)(1)(i) and (v) because the Conowingo 220-47 230 kV Transmission Line Project will be constructed entirely on existing right-of-way and in such a manner that the right-of-way is not substantially altered. Moreover, the Commission has reviewed the filing and does not find it to be inconsistent with the applicable law or Commission policy regarding transmission line siting and, therefore, to be in the public interest.

We also note that our approval of the Letter of Notification does not address the issues of accounting treatment, and cost recovery; **THEREFORE,**

IT IS ORDERED:

1. That the Letter of Notification of PECO Energy Company for approval to construct the Conowingo 220-47 230 kV Transmission Line Project, located in Plymouth and Upper Merion Townships, Montgomery County, Pennsylvania, is hereby approved.

2. That upon completion of the subject project, PECO Energy Company shall file the final project cost with the Commission.

3. That upon completion of Ordering Paragraph 2, this proceeding at Docket No. A-2024-3052612 be closed.

BY THE COMMISSION,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is written in a cursive, flowing style.

Rosemary Chiavetta
Secretary

ORDER ADOPTED: March 27, 2025

ORDER ENTERED: March 27, 2025