

# Morgan Lewis

**Kenneth M. Kulak**

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

April 4, 2025

## 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: Application of PECO Energy Company Filed Pursuant to 52 Pa. Code § 57.71 et seq. for Approval of the Siting and Construction of the Brandon Shores Retirement Mitigation Project Located in Peach Bottom Township, York County, Pennsylvania and Petition for Waiver of 52 Pa. Code § 57.72(c)(10) Docket Nos. A-2024-3051467 & P-2025-3053944**

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Dear Secretary Chiavetta:

Enclosed for filing in the above-captioned proceeding is the Certificate of Service evidencing service of PECO Energy Company's Responses to the Data Requests of the Bureau of Technical Utility Services, Question Nos. A-1 to A-5.

As indicated on the enclosed Certificate of Service, copies have been served upon all parties of record.

If you have any questions, please call me directly at 215.963.5384.

Very truly yours,



Kenneth M. Kulak

KMK/ap  
Enclosure

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

**Morgan, Lewis & Bockius LLP**

2222 Market Street  
Philadelphia, PA 19103  
United States

**T** +1.215.963.5000  
**F** +1.215.963.5001

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of PECO Energy Company :**  
**Filed Pursuant to 52 Pa. Code §§ 57.71 *et* :**  
***seq.* for Approval of the Siting and :**  
**Construction of the Brandon Shores :**                   **Docket Nos. A-2024-3051463**  
**Retirement Mitigation Project Located in :**                   **P-2025-3053944**  
**Peach Bottom Township, York County, :**  
**Pennsylvania and Petition for Waiver of 52 :**  
**Pa. Code § 57.72(c)(10)**

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

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**TUS-A-1:**

Reference the Application, Paragraph 5. Please explain whether Brandon Shores Unit 1 and Unit 2 are still expected to retire.

**RESPONSE:**

Brandon Shores Unit 1 and Unit 2 are still expected to retire. Brandon Shores Unit 1 and Unit 2 are listed on PJM’s website for Generation Deactivations with a deactivation date currently set for December 31, 2028.<sup>1</sup> In addition, Talen Energy Corporation (“Talen”) filed a Continuing Operations Rate Schedule with FERC in Docket No. ER24-1790 reflecting a deactivation date of December 31, 2028, for Brandon Shores Unit 1 and Unit 2, which remains pending. Talen also filed a non-unanimous settlement in the docket on January 27, 2025, which extends Brandon Shores’ service through at least May 2029, but the settlement is contested and also remains pending. Accordingly, PECO continues to execute the project timeline based on the PJM stated deactivation date of December 31, 2028.

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<sup>1</sup> See <https://www.pjm.com/planning/service-requests/gen-deactivations>.

**TUS-A-2:**

Reference the Application, Paragraph 6. Please state the name of the entity that will pay for the proposed project.

**RESPONSE:**

PECO Energy Company will fund the upfront construction costs for the proposed Project. The costs for the Project will then be recovered through PECO's transmission rates based on PJM's allocation rules, which allocate costs based on load ratio share and by a solution-based distribution factor (also known as DFAX).

**TUS-A-3:**

Reference the Application, Paragraph 29. Please state the approximate width of the new and existing right-of-way for each of the proposed transmission lines.

**RESPONSE:**

The approximate widths of the new and existing rights-of-way for each of the proposed transmission lines of the Project are listed below.

	<b>Approximate Proposed ROW Width (ft)</b>					
	<b>220-08</b>	<b>220-93</b>	<b>5012</b>	<b>5040</b>	<b>5042</b>	<b>Total***</b>
<b>Cross Section #1</b>	--	--	--	<b>100</b>	--	<b>300</b>
<b>Cross Section #2</b>	<b>200*</b>	<b>175</b>	--	<b>380**</b>	<b>100</b>	<b>955</b>
<b>Cross Section #3</b>	<b>150</b>	<b>150</b>	--	<b>190</b>	<b>100</b>	<b>690</b>
<b>Cross Section #4</b>	<b>100</b>	--	<b>160</b>	<b>150</b>	--	<b>490</b>
<b>Cross Section #5</b>	<b>150</b>	--	--	--	--	<b>150</b>
<b>Cross Section #6</b>	--	--	<b>145</b>	--	--	<b>290</b>
<b>Cross Section #7</b>	--	--	<b>185</b>	--	--	<b>370</b>

\* Cooper Substation

\*\* Includes future Cooper Substation expansion area.

\*\*\* The total width is composed of proposed transmission lines of the Project, as well as for the proposed transmission lines of the PJM 2022 Reliability Window # 3 Project filed in Docket No. A-2024-3051463.

	Approximate Existing ROW Width (ft)						
	1T	2T	220-08	220-93	5012	5014	Total*
<b>Cross Section #1</b>	--	--	--	140	160	--	300
<b>Cross Section #2</b>	--	--	200*	--	175	--	375
<b>Cross Section #3</b>	--	--	140	--	160	--	300
<b>Cross Section #4</b>	--	--	140	--	160	--	300
<b>Cross Section #5</b>	--	--	120	--	--	--	120
<b>Cross Section #6</b>	--	--	--	--	--	--	0
<b>Cross Section #7</b>	185	--	--	--	185	--	370

\* Cooper Substation

**TUS-A-4:**

Reference the Application, Paragraph 29. Please state the approximate height of the existing transmission structures to be removed.

**RESPONSE:**

The only existing transmission lines for which existing structures will be removed for the Project are listed below along with the approximate height of the respective existing transmission structures.

<b>Existing Circuit</b>	<b>Approximate Height Range of Existing Structures to be Removed (ft)</b>
1T	110 - 140
2T	160
220-08	75 - 90
220-93	75 - 125
5012	90 - 150
5014	150

**TUS-A-5:**

Reference the Application, PECO Statement No. 4. Please explain whether PECO considered the use of advanced conductors for the subject project. If not, please provide a detailed explanation as to why.

**RESPONSE:**

PECO is utilizing steel core advanced conductors for the Project. PECO is using Aluminum Conductor, Steel Supported (ACSS/TW) conductors with trapezoidal shaped wire strands for all the new circuits.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of PECO Energy Company Filed :  
Pursuant to 52 Pa. Code §§ 57.71 et seq. for :  
Approval of the Siting and Construction of :                   Docket Nos. A-2024-3051467  
the Brandon Shores Retirement Mitigation :                         P-2025-3053944  
Project Located in Peach Bottom Township, :  
York County, Pennsylvania and Petition for :  
Waiver of 52 Pa. Code § 57.72(c)(10) :**

**VERIFICATION**

I, William J. Patterer, hereby state the facts set forth are true and correct to the best of my knowledge, information and belief. 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: 4/2/2025

  
\_\_\_\_\_  
WILLIAM J. PATERER  
Vice President, Projects and Contracts

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of PECO Energy Company Filed :  
Pursuant to 52 Pa. Code §§ 57.71 *et seq.* for :  
Approval of the Siting and Construction of :                   Docket Nos. A-2024-3051467  
the Brandon Shores Retirement Mitigation :                                   P-2025-3053944  
Project Located in Peach Bottom Township, :  
York County, Pennsylvania and Petition for :  
Waiver of 52 Pa. Code § 57.72(c)(10) :**

**CERTIFICATE OF SERVICE**

I hereby certify 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**

Darryl A. Lawrence  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place – 5th Floor  
Harrisburg, PA 17101-1921  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)

Allison C. Kaster  
Bureau of Investigation and Enforcement  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Jordan Van Order  
Bureau of Technical Utility Services  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120  
[jvanorder@pa.gov](mailto:jvanorder@pa.gov)

NazAarah Sabree  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101  
[nsabree@pa.gov](mailto:nsabree@pa.gov)

John F. Povilaitis  
Alan M. Seltzer  
Buchanan  
409 N. Second Street, Suite 500  
Harrisburg, PA 1710  
[john.povilaitis@bipc.com](mailto:john.povilaitis@bipc.com)  
[alan.seltzer@bipc.com](mailto:alan.seltzer@bipc.com)

*Counsel for Transource Pennsylvania, LLC*

Dated: April 4, 2025

Hector Garcia Santana  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Columbus, OH 43215  
[hgarci1@aep.com](mailto:hgarci1@aep.com)

*Counsel for Transource Pennsylvania, LLC*



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