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May 5, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, 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 220-09 Line Tap Project Located in East Whiteland Township,
Chester County, Pennsylvania
Docket No. A-2025-3054731**

Dear Secretary Homsher:

Enclosed for filing in the above-captioned proceeding are PECO Energy Company's Responses to the Data Requests of the Bureau of Technical Utility Services, Question Nos. A-1 to A-4. PECO's responses to the data requests include the following **CONFIDENTIAL** attachment:

CONFIDENTIAL Attachment TUS-A-1

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

As indicated on the enclosed Certificate of Service, copies of the non-confidential version of the responses have been served upon all parties of record. The confidential material will be sent via Federal Express to both the Secretary and Jordan Van Order as directed in the Data Requests dated April 25, 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 black ink, appearing to read "Kenneth M. Kulak". The signature is written in a cursive style with a large initial 'K'.

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 220-09 Line Tap : **Docket No. A-2025- 3054731**
Project Located in East Whiteland :
Township, Chester 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 6. Please state separately the transmission costs and distribution costs. Additionally, please provide a detailed explanation as to how PECO differentiates between transmission and distribution for customers taking service at 230 kV.

RESPONSE:

Of the total \$4.8M Project cost, \$3.7M are distribution costs associated with the high voltage distribution line and the remaining \$1.1M are transmission costs associated with substation upgrades that will enhance the capability of the substation for all customers.

PECO Plant Accounting, Capital Project Management, Maintenance Program Management, as well as financial and regulatory personnel reviewed the Project to classify PECO assets as Transmission or Distribution. PECO functionalized capital assets as Transmission or Distribution and assigned the assets to utility accounts in accordance with FERC's Uniform System of Accounts and pursuant to FERC's Seven Factor Test under FERC Order 888. PECO classified the proposed high voltage distribution line as Distribution because the asset will be in close proximity to the single retail customer that the line will serve, primarily radial in character, and carry power consumed in the restricted geographical area of the customer's data center.

TUS-A-2:

Reference the Letter of Notification, Paragraph 6. Please provide a detailed explanation as to how PECO will recover its investment should the customer decide to cancel the subject project.

RESPONSE:

PECO is providing a response to this request in **CONFIDENTIAL** Attachment TUS-A-2.

TUS-A-3:

Reference the Letter of Notification, Paragraph 12. Please state the approximate width of the right-of-way for the proposed 220-09 230 kV line tap.

RESPONSE:

The approximate width of the right-of-way is 100 feet.

TUS-A-4:

Reference the Letter of Notification, Attachment 2, Section 6. Please state the approximate height of nearby existing transmission line structures.

RESPONSE:

The proposed Project line will tap a span between two existing towers of the existing 220-09 230 kV transmission line that are approximately 84 and 104 feet in height.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Letter of Notification of PECO Energy :
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57.71 et seq. for Approval of the Siting and : Docket No. A-2025- 3054731
Construction of the 220-09 Line Tap Project :
Located in East Whiteland Township, :
Chester 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: May 5, 2025



Drew T. Davis
Vice President, Transmission and Substation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Located in East Whiteland Township, :
Chester County, Pennsylvania :**

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

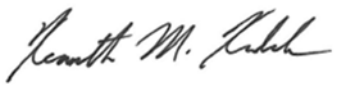
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Dated: May 5, 2025



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*= will also receive Confidential version of responses.