

# Morgan Lewis

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June 20, 2025

## VIA ELECTRONIC FILING & FEDERAL EXPRESS

Matthew L. Homsher, 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 to Acquire Certain Property  
Rights from Calpine Mid Merit, LLC  
Docket No. A-2025-3055493**

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-3.

PECO's responses to data request A-1 is **CONFIDENTIAL** and has been labeled "**CONFIDENTIAL – RESTRICTED.**" PECO requests that this response 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 response will be sent via Federal Express to both the Secretary and Jordan Van Order as directed in the Data Requests dated June 10, 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**

**Application of PECO Energy Company to :  
Acquire Certain Property Rights from :                   Docket No. A-2025- 3055493  
Calpine Mid Merit, LLC :**

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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 6. Please provide a detailed explanation of the methodology used to determine the purchase price and provide a copy of any third-party appraisals.**

**RESPONSE: CONFIDENTIAL - RESTRICTED**

**TUS-A-2:**

**Reference the Application, Paragraph 6. Please explain how PECO will finance the subject transaction.**

**RESPONSE:**

The capital to purchase the assets in the proposed transaction will be paid with cash available to the Company.

**TUS-A-3:**

**Reference the Application, Paragraph 14. Please provide a detailed explanation as to why the transaction is in the public interest.**

**RESPONSE:**

PECO is purchasing these easements (along with the existing Calpine line) to support two PJM-directed transmission projects: (a) the Brandon Shores Retirement Mitigation Project, which is described in detail in *Application of PECO Energy Co. 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 Twp., York Cty., Pa. and Petition for Waiver of 52 Pa. Code § 57.72(c)(10)*, Docket No. A-2024-3051463 (filed Sept. 30, 2024) (“Brandon Shores Application”) and (b) the PJM 2022 Reliability Window #3 Project, which is described in detail in *Application of PECO Energy Co. Filed Pursuant to 52 Pa. Code §§ 57.71 et seq. for Approval of the Siting and Construction of the PJM 2022 Reliability Window #3 Project Located in Peach Bottom Twp., York Cty., Pa. and Petition for Waiver of 52 Pa. Code § 57.72(c)(10)*, Docket No. A-2024-3051467 (filed September 30, 2024) (“PJM 2022 Window #3 Application”).

The Brandon Shores Retirement Mitigation Project and PJM 2022 Reliability Window #3 Project involve the construction of several new 500 kV lines that require the relocation of the existing Calpine line in the easements. In addition, the existing Calpine line will need to be tapped to interconnect the new Bramah substation being constructed by Transource (previously reviewed and approved by the Commission at Docket No. A-2024-3049272).

PECO’s intended purchase of the Calpine line and the easements (which proceeded through a competitive process conducted by Calpine) will facilitate this required work for the Brandon Shores Retirement Mitigation Project and PJM 2022 Reliability Window #3 Project. As set forth in the Application in this proceeding and in the Brandon Shores Application and the PJM 2022 Window #3 Applications, these projects are necessary to mitigate significant and widespread reliability issues in the Mid-Atlantic region, including PECO’s transmission facilities in southeastern Pennsylvania. PECO’s related purchase of the easements for which PECO seeks approval in this proceeding is in the public interest because the new and reconstructed transmission lines will use the easements and the easements are necessary for the required work to proceed.



