



**COMMONWEALTH OF PENNSYLVANIA**  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET  
HARRISBURG, PENNSYLVANIA 17120

July 23, 2025

Docket Nos. A-2024-3051467  
P-2025-3053944  
Utility Code: 110550

KENNETH M KULAK  
MORGAN LEWIS & BOCKIUS LLP  
2222 MARKET STREET  
PHILADELPHIA PA 19103-2921

Re: Application of PECO Energy Company for the Brandon Shores Retirement Mitigation Project in York County, Pennsylvania.

Dear Mr. Kulak:

On September 30, 2024, PECO Energy Company (PECO) filed an application for approval to construct the Brandon Shores Retirement Mitigation Project in York County, Pennsylvania. In order for us to complete our analysis of the subject application, the Bureau of Technical Utility Services requires answers to the enclosed data requests. This information is necessary for completion of our review of the filing.

Please forward the requested information to the Secretary of the Commission **within six (6) days** of receipt of this letter. Failure to respond may result in the application being denied. As well, if PECO has decided to withdraw its filing, please reply notifying the Commission of such a decision.

All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response and mark the materials "CONFIDENTIAL" in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

The overnight address for hard-copy or confidential responses is:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**Your answers should be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

*I, [print name of appropriate company representative], hereby state that 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).*

Signature \_\_\_\_\_  
Title \_\_\_\_\_  
Date \_\_\_\_\_

In addition, to expedite analysis of the Application, send a copy of your response to Jordan Van Order at [jvanorder@pa.gov](mailto:jvanorder@pa.gov). If any problems arise that prevent a full timely response or if any clarification of these data requests is needed, contact Jordan Van Order, Bureau of Technical Utility Services, at [jvanorder@pa.gov](mailto:jvanorder@pa.gov) (preferred) or 717-787-8763.

Sincerely,



Matthew L. Homsher  
Secretary

Enclosure

**Bureau of Technical Utility Services**  
**Data Requests**  
Docket Nos. A-2024-3051467 & P-2025-3053944

- A-6 Reference the Application, Paragraph 11. Please state the specific requirements of 52 Pa. Code § 69.3105 from which PECO is seek a waiver and provide a detailed explanation as to why.
- A-7 Reference the Application, Paragraph 17. Please provide the date of the TEAC meeting the subject project was presented at and the corresponding PJM baseline project number(s) associated with the Siting Application.
- A-8 Reference the Application, Paragraph 18. Please provide a detailed explanation as to how the subject project will resolve the problem described.
- A-9 Reference the Application, Paragraph 19. Please explain whether the subject project is part of PECO's 2022 RTEP Reliability Window 3 project at Docket No. A-2024-3051463. If so, please provide a detailed explanation as to how the projects are interrelated.
- A-10 Reference the Application, Paragraph 38. Please explain whether PECO has obtained all of the necessary land rights.
- A-11 Reference the Application, Paragraph 46. Please provide a copy of the response from the Department of Conservation and Natural Resources.
- A-12 Reference the Application, Paragraph 47. Please provide a copy of the response from the Pennsylvania Fish and Boat Commission.
- A-13 Reference the Application, Paragraph 48. Please provide a copy of the response from the U.S. Fish and Wildlife Service.
- A-14 Reference the Application, Attachment 10, page 23. Please explain whether the potential wetlands to be impacted are located within the Commonwealth of Pennsylvania.
- A-15 Please explain whether the subject project is related to PPL Electric Utility Corporation's Three Mile Island – Chanceford 500 kV Transmission Line Project at Docket No. A-2024-3051167. If so, please provide a detailed explanation as to how the projects are interrelated.