

Morgan Lewis

Kenneth M. Kulak

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

July 25, 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: Application of PECO Energy Company 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 Township, York
County, Pennsylvania and Petition for Waiver of 52 Pa. Code § 57.72(c)(10)
Docket Nos. A-2024-3051463 & P-2025-3053955**

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-4 to A-10.

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 <i>et</i>	:	
<i>seq.</i> for Approval of the Siting and	:	
Construction of the PJM 2022 Reliability	:	Docket Nos. A-2024-3051463
Window # 3 Project Located in Peach	:	P-2025-3053955
Bottom Township, York County,	:	
Pennsylvania and Petition for Waiver of	:	
52 Pa. Code § 57.72(c)(10)	:	

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

TUS-A-4:

Reference the Application, Paragraph 18. Please provide a detailed explanation as to how the subject project will resolve the problem described.

RESPONSE:

In PECO’s Application, PECO explained that PJM:

“projected growth of significant load concentrated primarily in northern Virginia, but also in parts of Maryland, due to the load growth in those areas in large part from the development of data centers in that region at an unprecedented rate.”

Application at 9-10; *see also* PECO Statement No. 2 and Attachment 2. As a result of this load growth,

“PJM determined that the anticipated high flows within the northern Virginia transmission system into the data center concentrated load pocket would cause widespread PJM voltage and thermal violations requiring system reinforcements to support the regional transfer of power.”

Id. PJM determined that reliability concerns would affect multiple power systems, including PECO’s power system, as well as cause “regional constraints along the Peach Bottom-Conastone-Brighton-Doubs 500 kV line, and that these systems would need substantial reactive power MVAR reinforcements.” *Id.*

PECO designed the PJM 2022 Reliability Window # 3 Project (“PJM22RW3 Project”) “to address thermal and voltage issues in the Mid- Atlantic territory, as well as thermal and voltage issues in the Dominion and FirstEnergy regions.” Application at 10. The

PJM22RW3 Project is also designed to “provide[] loading relief and reactive support along the seams to other transmission owner zones, particularly for BGE, Pepco, and Delmarva Power.” *Id.*

As PECO explained in the Application, the PJM22RW3 Project:

“will support the mitigation of thermal and voltage issues in the Mid-Atlantic, Dominion, and FirstEnergy regions, allow for the supply of load to the growing data center load pocket in the northern Virginia area, increase transmission capacity within PECO’s service territory, while also removing congestion on existing facilities in the line 5012 corridor.”

Application at 24. In addition:

“PECO’s Project will extend from the Pennsylvania and Maryland border to the Peach Bottom North and South substations, reinforcing the transfer of power from east of the Peach Bottom Nuclear Generation Station to the Graceton Substation area in Maryland and interconnecting new and upgraded 500 kV transmission along this route.”

Id.; see also PECO Statement No. 2 at 12.

PJM determined that the PJM22RW3 Project supported mitigation of the identified reliability concerns.¹ As explained in Attachment 2 at pages 6 to 7:

“PJM determined that the final recommended solutions, including PECO’s Project, met all applicable planning stability criteria (i.e., PJM, NERC, and local transmission owner criteria) with the reinforcements capturing the impact of the load increase, change in generation resource mix, and dispatch pattern.”

The PJM22RW3 Project is critical to address the reliability concerns identified by PJM. As explained in PECO Statement No. 2 at pages 14-15:

“if the Project is not constructed, PECO will be in violation of the PJM reliability criteria tests which identified the overloads and other reliability issues that led to the proposed Project. For example, if the Project is not completed and the specific outage events identified in the analyses were to occur, in the worst case, catastrophic failure of various transmission facilities could occur and/or customer load would be dropped to prevent such failures. This could result in customers losing power and being

¹ PJM also “found PECO’s proposal was a scalable solution that ensured, at a minimum, that near-term reliability needs are addressed while also enabling future expansion beyond the 2027-28 baseline levels. PJM also found that PECO’s proposal provided necessary scalability and robustness to address the needs posed by the 2028 PJM system conditions. Further, PJM selected PECO’s proposal because it met performance requirements, effectively utilized existing rights-of-way, and was the most efficient or cost-effective proposal for the region.” Attachment 2 at 7.

without power for significant durations until the facilities were repaired. The severity of these issues would not only impact customers in PECO's service territory, but based on the results identified by PJM, these issues could impact customers across the Mid-Atlantic and service territories of BGE, Pepco, Dominion Energy, and parts of the FirstEnergy Corporation service territory. In order to avoid these potential consequences, to reliably maintain the grid for when the new data center loads in northern Virginia and Maryland materialize, and to address the reliability issues within the PECO service territory, the Project must be constructed."

TUS-A-5:

Reference the Application, Paragraph 19. Please explain whether the subject project is part of PECO's Brandon Shores Retirement Mitigation project at Docket No. A-2024-3051467. If so, please provide a detailed explanation as to how the projects are interrelated.

RESPONSE:

No, the PJM22RW3 Project is separate from the Brandon Shores Retirement Mitigation Project ("Brandon Shores Project"). However, PECO notes that the two projects are similar as PECO will construct transmission facilities in the same general location at approximately the same time. Moreover, as explained in the Application, the PJM22RW3 Project incorporated the Brandon Shores Project in its design to holistically address reliability issues "in the PECO territory associated with the generator retirements in the BGE service territory as well as the data center load growth in Virginia and Maryland." Attachment 2 at fn 5.

The two projects are interrelated. "The PJM 2022 Reliability Window 3 Project is designed to accommodate the scope of the Brandon Shore Project and therefore it is critical that both projects are approved by the Commission." Attachment 2 at 4. In addition, the certain work activities will benefit both projects. For example:

"PECO will remove the existing 230 kV and 500 kV transmission lines from most of PECO's existing transmission corridor to allow for the construction of new transmission lines for the proposed Project, as well as PECO's separate Brandon Shores Retirement Mitigation Project."

Application at 17.

No segment of transmission line proposed for construction is shared by the two projects and each segment is unique. Attachment 20 visually identifies the transmission segments proposed for construction in the PJM22RW3 Project pursuant to a color-coding system described in the legend at the bottom left of the maps. Attachment 20 also depicts the proposed transmission segments for the Brandon Shores Project in grey.

TUS-A-6:

Reference the Application, Paragraph 26. Please explain whether the extension of the 500 kV 5012 Line is separate from the construction of the new 5012 Line described at Docket No. A-2024-3051467.

RESPONSE:

Yes, the PJM22RW3 Project and Brandon Shores Project each include construction of unique and separate segments of the 500 kV 5012 Line. As shown on page 5 of Attachment 20 depicted in blue, and described in the Application at Paragraph 26, the PJM22RW3 Project includes construction of a new approximately 600-foot extension of the 500 kV 5012 Line near Peach Bottom South Substation. Page 4 of Attachment 20 shows depicted in grey a separate new segment of the 500 kV 5012 Line to be constructed as part of the Brandon Shores Project from the existing 5012 Line to the Bramah Substation.²

TUS-A-7:

Reference the Application, Paragraph 26. Please explain whether the construction of the 500 kV 5042 Line is separate from the construction of the new 5042 Line described at Docket No. A-2024-3051467.

RESPONSE:

Yes, the PJM22RW3 Project and Brandon Shores Project each include construction of unique and separate segments of the 500 kV 5042 Line. As shown on pages 1 through 3 of Attachment 20 depicted in yellow, and described in the Application at Paragraph 26, the PJM22RW3 Project includes construction of a new approximately 4.0 miles 500 kV 5042 Line from the Pennsylvania and Maryland border to the existing structure 2-3 of the 5012 Line. Pages 3 and 4 of Attachment 20 show depicted in grey a separate new segment of the 500 kV 5042 Line to be constructed as part of the Brandon Shores Project from existing structure 2-3 of the 5012 Line to the Bramah Substation.³

TUS-A-8:

Reference the Application, Paragraph 42. Please provide a copy of the response from the Department of Conservation and Natural Resources.

² The Brandon Shores Project Application in Docket No. A-2024-3051467 includes a similar set of maps also titled Attachment 20 that depicts the Brandon Shore Project's new Line 5012 segment in blue at page 4.

³ The Brandon Shores Project Application, Attachment 20 depicts the Brandon Shore Project's new Line 5042 segment in yellow at pages 3 to 4.

RESPONSE:

Please see Attachment TUS-A-8.

TUS-A-9:

Reference the Application, Paragraph 43. Please provide a copy of the response from the Pennsylvania Fish and Boat Commission.

RESPONSE:

Please see Attachment TUS-A-9.

TUS-A-10:

Reference the Application, Paragraph 44. Please provide a copy of the response from the U.S. Fish and Wildlife Service.

RESPONSE:

Please see Attachment TUS-A-10.

ATTACHMENT TUS-A-8



January 30, 2025

PNDI Number: 810587
Version: Final_2; 1/14/2025

Rebecca Buchanan
AECOM

625 West Ridge Pike
Suite E-100, 19428
Conshohocken, PA 19428
Email: becky.buchanan@aecom.com (hard copy will not follow)

Re: PECO Brandon Shores/Dominion
Peach Bottom Township, York County, PA

Dear Rebecca Buchanan,

Thank you for the submission of your field survey for Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt Number **810587 (Final_2)** for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

No Impact Anticipated per Survey with Avoidance and Monitoring

PA DCNR requested a botanical survey for this project on March 26, 2024. A survey was performed by Anthony Silva, Israel Berrios, Ethan DuBois, and Jacob DuBois throughout the 2024 growing/flowering seasons. Survey results are below:

Scientific Name	Common Name	PA Current Status	PA Proposed Status	Legal Protection Status
<i>Desmodium nuttallii</i>	Nuttall's Tick-Trefoil	Tentatively undetermined	Threatened	Protected PNDI Environmental Review Species
<i>Dicanthelium scoparium</i>	Velvet Panic-grass	Endangered	Endangered	
<i>Hypericum stragulum</i>	Low St. John's Wort	Not Listed	Rare	
<i>Ilex opaca</i>	American Holly	Threatened	De-list	
<i>Eupatorium rotundifolium</i>	Round-leaved Boneset	Tentatively undetermined	Threatened	Unprotected Watch-list species
<i>Eupatorium torreyanum</i>	Fringed Boneset	Not Listed	Under Review	
<i>Conoclinium coelestinum</i>	Mistflower	Not listed	None	
<i>Helianthus giganteus</i>	Tall Sunflower	Not Listed	None	

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Conservation Measures/Action Items:

- *Desmodium nuttallii, Dichantherium scoparium, Hypericum stragulum:*
There are no individuals directly located in the project LOD, however several populations and individuals are located in close proximity to grading and installation sites. As such please install orange protective fencing around all populations of these species throughout the duration of the construction. Ensure that plant locations are well marked on site plans for contractors, subcontractors, and on-site personnel. Avoid the use of broadcast herbicide application in these areas as well. Please perform one monitoring event post-construction and submit the monitoring report to DCNR for evaluation.
- *Dichantherium scoparium:* Please create a selective herbicide plan for the section of ROW that this species was identified. When spraying, please use a grass/graminoid-exclusive herbicide when performing vegetative maintenance.
- *Ilex opaca:*
It is DCNR's assessment that the American Holly individuals found on site are not genetically native to PA. They are most likely escaped cultivars, therefore no actions are required for this species.
- Watch-list species:
Due to the relative abundance of these populations on site, and lack of legal protection, no actions or required for these species. However these records are helpful for tracking overall population health in PA. Thank you for submitting these useful data to DCNR.

With the addition of these measures, DCNR has determined that no impact is likely. No further coordination with our agency is needed for this project.

Recommended Best Management Practices:

- Use a conservative approach to project design that minimizes permanent and temporary disturbances to soil and native vegetation. This will conserve habitat and limit opportunities for invasive plants.
- Clean boot treads, tools, construction equipment, watercraft, and vehicles thoroughly (especially the undercarriage and wheels) before they are brought on site. This will remove invasive plant seeds and invasive earthworms/cocoons that may have been picked up at other worksites.
- Use clean project materials (e.g., weed-free straw, topsoil, rock fill, etc.) or materials native to the worksite to avoid introducing invasive species from contaminated sources.
- Do not use seed mixes that include invasive species. More information about invasive plants in Pennsylvania can be found at the following link:
<http://www.dcnr.pa.gov/Conservation/WildPlants/InvasivePlants/Pages/default.aspx>
- Use habitat appropriate seed mixes and, when available, use PA ecotypes. For example, use a riparian seed mix when reseeding along a waterway. The Bureau of Forestry Planting & Seeding Guidelines can be found at the following link for recommendations:
http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr_20031083.pdf

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- Use native plants for landscaping, revegetation, and stormwater management. Do not use nonnative invasive species. Reduce the area of lawn and impermeable surfaces to the fullest extent practicable in favor of native gardens or habitat restoration (e.g., forest, meadow, wetland, etc.). More information about lawn conversion can be found at the following link: <https://www.dcnr.pa.gov/Conservation/Water/LawnConversion/Pages/default.aspx>
- Plant forest buffers where trees were historically present along streams, wetlands, and bodies of water. Buffers should be a minimum of 35 feet in width (ideally at least 100 feet in width). Where trees are not appropriate (e.g., powerline rights-of-way), buffer with native shrubs and herbaceous plants. More information about riparian buffers can be found at the following link: <https://www.dcnr.pa.gov/Conservation/Water/RiparianBuffers/Pages/default.aspx>
- Manage road/utility rights-of-way, median strips, edges, and other green spaces for diverse native plant communities and wildlife (e.g., common and swamp milkweed for monarch butterfly). In seed mixes, include PA native wildflowers that have overlapping bloom periods and provide forage for pollinators throughout the growing season.
- Avoid blanket herbicide applications; instead, spot-treat undesirable tall woody vegetation and invasive weeds. Where mowing is necessary, reduce frequency to once every few years during the dormant season (i.e., after first frost in late fall and before bird nesting in early spring), leaving some refugia for overwintering wildlife.
- Monitor for invasive plants before, during, and after project activities and promptly control any identified infestations. Frequent monitoring allows for early detection and rapid response.

Should you have any questions or concerns, please contact Alexander Dogonniuck, Ecological Information Specialist, by phone (717-783-3913) or via email (c-adogonni@pa.gov).

Sincerely,



Greg Podnieszinski, Section Chief
Natural Heritage Section

BUREAU OF FORESTRY

March 26, 2024

PNDI Number: 810587

Version: Final_1; 3/26/24

Rebecca Buchanan

Project Manager

625 West Ride Pike, Suite E-100

Conshohocken, PA 19428

Email: becky.buchanan@aecom.com (hard copy will not follow)

**Re: PECO Brandon Shores/Dominion
Peach Bottom Township, York County, PA**

Dear Rebecca Buchanan,

Thank you for the submission of the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt Number 810587 (Final_1) for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

Potential Impact Anticipated – Survey Request

PNDI records indicate species or resources under DCNR's jurisdiction are located in the project vicinity. Based on a detailed PNDI review, DCNR determined potential impacts to the following threatened or endangered species or species of special concern.

Scientific Name	Common Name	PA Current Status	PA Proposed Status	Survey Window	Suitable Habitat	Local Habitat
<i>Lobelia puberula</i>	Downy Lobelia	PE	PE	Flowers late August – September	Moist, sandy soil of old fields, gravel pits and serpentine barrens	Muddy Creek SE of Woodbine
<i>Euphorbia purpurea</i>	Glade Spurge	PE	PE	Flowers May – July	Swamps or moist thickets on rich soils	Bryansville Station Seep
<i>Dichanthelium scoparium</i>	Velvety panic-grass	PE	PE	Vernal terminal panicles May – early July or late summer or early fall	Moist meadows and swales	Koepper Property
<i>Vernonia glauca</i>	Tawny ironweed	PE	PE	Flowers July – October	Dry fields, open slopes or clearings	Campbell Property
<i>Erigenia bulbosa</i>	Harbinger-of-spring	PT	PR	Flowers March – April	Seeps and spring heads on wooded slopes	Peach Bottom woods
<i>Asplenium pinnatifidum</i>	Lobed Spleenwort	PR	PR	Year-round (evergreen)	Dry, shaded rock crevices,	Atom Road woods

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					in subacidic to circumneutral	
<i>Packera anonyma</i>	Plain Ragwort	PR	PR	Flowers May – September	Dry fields, open woods and serpentine barrens	Koepper Property
<i>Chionanthus virginicus</i>	Fringe-tree	N	PT	Flowers May; purple . black fruit in fall	Moist, open woods and woods edges, also cultivated	Castle Fin
<i>Trillium flexipes</i>	Declined Trillium	TU	PT	Flowers late April – early May	Wooded hillsides, swampy woods and floodplains	Peach bottom woods
<i>Trillium cernuum</i>	Nodding Trillium	N	PT	Flowers April – May	Rich woods	Bryansville Station Seep
<i>Nabalus serpentaria</i>	Lion’s-foot	N	PT	Flowers August – early October	Dry woods, clearings and gravelly roadsides	Koepper Property
<i>Desmodium nuttallii</i>	Nuttalls’ Tick-trefoil	TU	PT	Flowers July – September	Open woods and edges	Campbell Property; south population

- ✓ **Survey Request:** A botanical survey for the above species should be conducted by a qualified botanist at the appropriate time of year. Please submit the resulting report to our office for review. Contact our office prior to the survey for detailed information about the species or for a list of qualified surveyors.
- ✓ **Your botanist should carefully review the new DCNR Botanical Survey Protocols available at <https://conservationexplorer.dcnr.pa.gov/content/survey-protocols>.** These protocols are recommended to ensure that all necessary information is collected and that survey reports are prepared properly. It is the expectation of DCNR that these protocols will be followed when conducting surveys for species under our jurisdiction.
- ✓ **DCNR recommends that a Wild Plant Management Permit be obtained before conducting botanical surveys for Threatened, Endangered, and Special Concern PA Plant Species.** Permit information and application can be found here: <https://conservationexplorer.dcnr.pa.gov/content/resources>
- ✓ **A list of qualified botanists who have obtained our Wild Plant Management Permit can be found at <https://conservationexplorer.dcnr.pa.gov/content/wild-plant-management-permit-holders>.** These botanists are suitable candidates to perform a survey to our scientific standards.
- ✓ All target and non-target state-listed species found during the botanical survey should be reported to our office. **Please submit a completed Botanical Field Survey Form for each occurrence or population identified: <http://www.gis.dcnr.state.pa.us/PNDI/2015%20Field%20Survey%20Form.pdf>.** Mitigation measures and monitoring may be requested if state-listed species are found on or adjacent to the site.
- ✓ If preferred habitat does not exist on site, a survey may not be necessary. Please submit a habitat assessment report which describes the current land cover, habitat types, and species found on site.

This response represents the most up-to-date review of the PNDI data files and is valid for two (2) years only. If project plans change or more information on listed or proposed species becomes available, our determination may be reconsidered. Should the proposed work continue beyond the period covered by this letter and a permit has not been acquired, please resubmit the project to this agency as an “Update” (including an updated PNDI receipt,

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project narrative, description of project changes and accurate map). As a reminder, this finding applies to potential impacts under DCNR's jurisdiction only. Visit the PNHP website for directions on contacting the Commonwealth's other resource agencies for environmental review.

Should you have any questions or concerns, please contact Alexander Dogonniuck, Ecological Information Specialist, by phone (717-783-3913) or via email (c-adogonni@pa.gov).

Sincerely,

A handwritten signature in black ink that reads "Greg Podnieszinski". The signature is written in a cursive style and is centered within a light gray rectangular box.

Greg Podnieszinski, Section Chief
Natural Heritage Section

ATTACHMENT TUS-A-9



February 27, 2025

IN REPLY REFER TO

SIR# 59558

AECOM

Rebecca Buchanan

625 West Ridge Pike

Conshohocken, Pennsylvania 19428

**RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species
PNDI Search No. 810587_1
PECO Brandon Shores/Dominion
Peach Bottom Township: YORK County**

Dear Rebecca Buchanan:

This letter is part of an ongoing consultation between the Pennsylvania Fish and Boat Commission (PFBC) and you regarding avoidance of impacts to the Broad-headed Skink (*Plestiodon laticeps*, PA Candidate).

You have provided detailed layouts of the project depicting proposed earth disturbance, in particular, tree clearing, as well as a description of the habitats on site provided by DuBois and Associates. Kathy Gipe of my staff reviewed these materials with you and in detail to determine the likelihood of the project impacting potential skink habitat. We also considered the project's distance from known occurrences of the Broad-headed Skink.

The following minimization and management strategies were created to meet the needs of the project applicant, the PFBC, and the Broad-headed Skink. This set of minimization and mitigation techniques should avoid unnecessary impacts to the Broad-headed Skink and its habitat during construction and could be carried out without a more detailed presence/absence survey for the species.

1. Reduction of Proposed Disturbance Area

The applicants have proactively reduced the disturbance areas to the minimum practicable for execution of the proposed project.

2. Seasonal restriction.

Tree Clearing within identified potential Broad-headed Skink habitat east of Booker Road in the areas surrounding the Peach Bottom North and South Substations should be conducted between November 15 and April 15 while the skinks are hibernating. Where possible, tree stumps and rocky ground cover will be left in place within these areas.

3. Creation of Habitat Areas for Future Use by the Broad-headed Skink.

Within the project area east of Booker Road, logs and rocks needed to be cleared from the right-of-way should be placed along the south-facing forest edges. Stones (no less than 2 feet on a side with no upper size limit) should be piled in pyramid shape to low pinnacle of 3 feet above grade. These stone habitats can be (roughly) square, rectangular, or circular configuration. Stone can be used from onsite or offsite sources.

This response represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

If you have any questions regarding this review, please contact Kathy Gipe at 814-359-5186 or c-kgipe@pa.gov and refer to the SIR # 59558. Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,

A handwritten signature in black ink that reads "Christopher A. Urban". The signature is written in a cursive, flowing style.

Christopher A. Urban, Chief
Natural Diversity Section

CAU/KDG/dn



October 29, 2024

IN REPLY REFER TO

SIR# 59558

AECOM

Rebecca Buchanan

625 West Ridge Pike

Conshohocken, Pennsylvania 19428

**RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species
PNDI Search No. 810587_1
PECO Brandon Shores/Dominion
Peach Bottom Township: YORK County**

Dear Rebecca Buchanan:

In follow-up to our initial review letter on this project, we received a report from DuBois and Associates detailing habitats along the proposed transmission line corridor. Several habitats were identified that could support the **Broad-headed Skink (*Plestiodon laticeps*, Candidate)**. The report included recommendations for avoiding and minimizing impacts to these habitats and a statement that PECO was working on the design of the project to incorporate these measures. I concur with the locations of the identified habitats and will need to further review project plans in these areas to determine additional avoidance measures.

Minimization and management strategies should be considered in the layout to meet the needs of the project applicant and conservation efforts for the Broad-headed Skink. These techniques may be necessary to avoid unnecessary impacts to the Broad-headed Skink and its habitat during construction and may include a significant reduction of the proposed disturbance area, utilization of exclusion barriers around habitat areas during construction, creation of habitat areas for future use by the Broad-headed Skink, and pre-construction surveys or monitoring. Alternatively, a survey to determine the presence/absence of the Broad-headed Skink in the habitat areas could be done by a qualified biologist. Note that currently, we do not have a list of qualified surveyors for the Broad-headed Skink. However, Mr. Brandon Ruhe of Ecological Associates, LLC has demonstrated his proficiency in finding Broadhead Skinks in Pennsylvania and in other nearby states, as well as identifying their critical habitats. We have reviewed his credentials, approved him, as well as permit him (Type 3 Scientific Collectors' Permit) to search for and collect Broad-headed Skinks. His contact information follows.

Brandon Ruhe
Ecological Associates, LLC
P.O. Box 181
Oley, PA 19547
610-987-6585
eabruhe@gmail.com

Please let me know which course of action you determine and we can continue our review of

the project once a more detailed layout can be provided. Follow-up information may be uploaded to the PA Conservation Explorer site PNDI project file.

If you have any questions regarding this review, please contact Kathy Gipe at 814-359-5186 or c-kgipe@pa.gov and refer to the SIR # 59558. Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,

A handwritten signature in black ink that reads "Christopher A. Urban". The signature is written in a cursive style with a large, prominent initial "C".

Christopher A. Urban, Chief
Natural Diversity Section

CAU/KDG/dn



April 2, 2024

IN REPLY REFER TO
SIR# 59558

AECOM
Rebecca Buchanan
625 West Ridge Pike
Conshohocken, Pennsylvania 19428

**RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species
PNDI Search No. 810587_1
PECO Brandon Shores/Dominion
Peach Bottom Township: YORK County**

Dear Rebecca Buchanan:

This responds to your inquiry about a Pennsylvania Natural Diversity Inventory (PNDI) Internet Database search “potential conflict” or a threatened and endangered species impact review. These projects are screened for potential conflicts with rare, candidate, threatened or endangered species under Pennsylvania Fish and Boat Commission jurisdiction (fish, reptiles, amphibians, aquatic invertebrates only) using the Pennsylvania Natural Diversity Inventory (PNDI) database and our own files. These species of special concern are listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, and the Pennsylvania Fish and Boat Code (Chapter 75), or the Wildlife Code.

Broad-headed Skink (*Plestiodon laticeps*, Candidate)

The Broad-headed Skink is a rare, arboreal lizard species of the Commonwealth that inhabits damp forested areas. Based on the review of this information and the proximity of the project to known element occurrences of the species of concern listed above, potential habitat could be present within the proposed disturbance area. Therefore, additional evaluations are necessary to confirm whether or not the project site contains habitat and to determine the potential for adverse impacts to this species. We request completion of a **habitat assessment** to characterize and determine if potential habitat exists within the vicinity of the proposed project area.

The Broadhead Skink habitat needs to be assessed along the length of the corridor where earth disturbance will occur. Note that currently, we do not have a list of qualified surveyors for the Broadhead Skink. However, Mr. Brandon Ruhe of Ecological Associates, LLC has demonstrated his proficiency in finding Broadhead Skinks in Pennsylvania and in other nearby states, as well as identifying their critical habitats. We have reviewed his credentials, approved him, as well as permit him (Type 3 Scientific Collectors’ Permit) to search for and collect Broadhead Skinks. His contact information follows.

Brandon Ruhe
Ecological Associates, LLC
P.O. Box 181
Oley, PA 19547
610-987-6585
eabruhe@gmail.com

ATTACHMENT TUS-A-10

ATTACHMENT TUS-A-10

PNDI # 810587

USFWS Project # 2024-0114825

U.S. FISH AND WILDLIFE SERVICE
110 Radnor Road, Suite 101, State College, PA 16801

This responds to your inquiry about a PNDI Internet Database search that resulted in a potential conflict with a federally listed, proposed or candidate species.

PROJECT LOCATION INFORMATION

County: York
Township: Peach Bottom
USFWS COMMENTS [checked] EMAILED [] MAILED
To: Rebecca Buchanan

MISC INFORMATION

Date received by FWS: July 11, 2024
Email: becky.buchanan@aecom.com
Affiliation: AECOM Technical Services, Inc.

SPECIFIC PROJECT: PECO Brandon Shores/Dominion

FISH AND WILDLIFE SERVICE COMMENT(S):

[] NO EFFECT

Except for occasional transient species, no federally listed, proposed or candidate species under our jurisdiction are known or likely to exist in the project area. Should project plans change, or if additional information on listed or proposed species becomes available, this determination may be reconsidered.

[checked] NOT LIKELY TO ADVERSELY AFFECT

The federally listed bog turtle occurs or may occur in or near the project area. However, based on our review of the information provided, including the project description and location (Wetlands 8, 9, 12, 14, and 15 were found to contain potential bog turtle habitat. Bryon DuBois and Anthony Silva, qualified bog turtle surveyor, conducted a Phase 2 presence/ probable absence bog turtle surveys for the wetland on the dates of April 23, May 7, May 22 and June 7, 2024.

No bog turtles or evidence of bog turtles were found on any of the survey dates, suggesting the probable absence of the species.), no adverse effects to this species are likely to occur. If there is any change in the location, scale, scope, layout or design of the project, further consultation or coordination with the Service will be necessary.

The above determination is valid for two years from the date of this letter. In addition, this response relates only to federally listed, proposed, and candidate species under our jurisdiction, based on an office review of the proposed project's location and anticipated impacts. No field inspection of the project area has been conducted by this office. Please reference the above PNDI # and USFWS Project # in any future correspondence regarding this project.

This review was conducted by the biologist listed below. He/she can be contacted at 814-206-(Extension).

[] Pamela Shellenberger (x7459)
[checked] Monica Mestre (x7462)

[] Nicole Ranalli (x7455)
[] Jennifer Kagel (x7451)

[] Richard Novak (x7477)
[] Sze Wing Yu (x7461)

SIGNATURE: ROBERT ANDERSON

Digitally signed by ROBERT ANDERSON
Date: 2024.11.27 11:53:56 -05'00'

Supervisor, Pennsylvania Field Office

**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-2024-3051463
the PJM 2022 Reliability Window # 3 Project : P-2025-3053955
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: 7/21/2025



WILLIAM J. PATTERER
Vice President, Projects and Contracts

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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 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

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

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

NazAarah Sabree
Office of Small Business Advocate
Forum Place
555 Walnut St.
1st Floor
Harrisburg, PA 17101
nsabree@pa.gov

Dated: July 25, 2025



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