



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

August 7, 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 four (4) 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-16 Reference TUS Data Requests, Response to A-4. Please state the number of existing transmission structures to be removed as part of the subject project.
- A-17 Reference TUS Data Requests, Response to A-9. Please confirm the interrelation between the subject project and the PJM 2022 Reliability Window # 3 Project is limited to construction timing and the use of a common right-of-way and/or transmission corridor. If any other interrelation between the projects exists, please provide a detailed explanation.
- A-18 Reference TUS Data Requests, Response to A-9 and Application, Paragraph 23. Please explain how the subject project and the PJM 2022 Reliability Window # 3 Project function in conjunction with one another. Additionally, please explain whether the elements to be leveraged are limited to construction timing and land rights.
- A-19 Reference the Application, Revised Attachment 10, Section 3.4.2. Please explain whether the archaeological surveys have been completed and provide the results as well as any compensatory measures that may need to be implemented.