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September 9, 2025

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
Harrisburg, PA 17120

Re: Petition of PECO Energy Company for a Finding of Necessity Pursuant to 53 P.S. § 10619 that the Situation of a Control Building Associated with the Forge Springs Substation in Upper Merion Township, Montgomery County, Is Reasonably Necessary for the Convenience and Welfare of the Public
Docket No. P-2025-_____

Dear Secretary Homsher:

Enclosed for filing on behalf of PECO Energy Company is a Petition for a Finding of Necessity Pursuant to 53 P.S. § 10619 that the Situation of a Control Building Associated with the Forge Springs Substation in Upper Merion Township, Montgomery County, Is Reasonably Necessary for the Convenience and Welfare of the Public.

PECO respectfully requests review and approval by the Pennsylvania Public Utility Commission (the "Commission") of the Petition on or before the March 12, 2026 Public Meeting in order to allow construction to commence in the second quarter of 2026.

Copies of the Petition and accompanying attachment are being served upon the persons as required by 52 Pa. Code § 5.41 and indicated on the enclosed Certificate of Service.

Morgan, Lewis & Bockius LLP

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Matthew Homsher
September 9, 2025
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If you have any questions pertaining to this matter, please do not hesitate to contact me.

Respectfully submitted,



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Counsel for PECO Energy Company

Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company for a :
Finding of Necessity Pursuant to 53 P.S. § :
10619 that the Situation of a Control : Docket No. P-2025-_____**
**Building Associated with the Forge :
Springs Substation in Upper Merion :
Township, Montgomery County, Is :
Reasonably Necessary for the :
Convenience and Welfare of the Public :**

PETITION OF PECO ENERGY COMPANY

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PECO Energy Company, a Pennsylvania corporation (“PECO” or the “Company”), hereby files, in accordance with the Pennsylvania Public Utility Commission (“Commission” or “PUC”) regulations at 52 Pa. Code Section 5.41 and Article VI of the Pennsylvania Municipalities Planning Code (as reenacted and amended December 21, 1988, P.L. 1329, 53 P.S. §§ 10601-10619.1) (“MPC”), this petition (“Petition”) for a finding pursuant to 53 P.S. § 10619 that a proposed enclosure that primarily houses equipment controls with a small area for a lavatory in connection with the Forge Springs Substation in Upper Merion Township, Montgomery County, Pennsylvania, is reasonably necessary for the convenience and welfare of the public. The proposed control equipment enclosure with lavatory will be constructed entirely within PECO’s new Forge Springs Substation. PECO respectfully requests review and approval by the Commission of the Letter of Notification (“LON”) on or before the March 12, 2026 Public Meeting in order to allow construction to commence in the second quarter of 2026.

This Petition for the proposed control equipment enclosure with lavatory is separate from but related to PECO’s LON filed concurrently with the Commission for approval to site and

construct transmission lines and related facilities associated with the proposed Forge Springs Project (hereinafter, the “Project”). Because of the interrelationship among this Petition and the LON, PECO seeks to consolidate these two filings for review, hearing if necessary, and final disposition. PECO respectfully requests Commission approval of this Petition as soon as reasonably possible consistent with the due process rights of interested parties.

In support therefore, PECO states as follows:

I. INTRODUCTION

1. This Petition is filed by PECO, a “public utility,” as defined in 66 Pa. C.S. § 102, that provides electric distribution, transmission, and default service in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. PECO’s address is as follows:

PECO Energy Company
2301 Market St.
Philadelphia, PA 19103

3. The names and addresses of PECO’s attorneys in this matter who are authorized to receive notices and communications on their clients’ behalf are:

Anthony E. Gay
PECO Energy Company
Vice President & General Counsel
2301 Market Street
Philadelphia, PA 19103
(267) 533-1964
anthony.gay@exeloncorp.com

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4. PECO furnishes electric service to approximately 1.7 million electric and over 553,000 natural gas customers throughout its certificated service territory, which encompasses approximately 2,100 square miles in Pennsylvania. PECO owns approximately 1,050 miles of transmission lines, approximately 13,000 miles of aerial distribution facilities, and approximately 9,000 miles of underground distribution facilities. In addition, PECO owns approximately 13,800 miles of natural gas mains and services.

5. As set forth herein, PECO proposes to construct and operate a proposed enclosure for equipment controls with lavatory at PECO's new Forge Springs Substation.

II. DESCRIPTION OF THE PROPOSED SUBSTATION CONTROL/EQUIPMENT ENCLOSURE

6. As more fully explained in the LON, PECO's existing Barbadoes Substation is on an island in the Schuylkill River, and the area has become prone to flooding. For example, in 2021 during Hurricane Ida, the island on which the Barbadoes Substation is located became flooded. To build resiliency against flood events like Hurricane Ida, PECO proposes to relocate the substation off the island and south of the river as part of PECO's proposed Project. This new substation will be the Forge Springs Substation. If the existing Barbadoes Substation was flooded in a worst-case scenario and power could not be redirected from other sources, PECO estimates that the result would be a total loss of electric service to 25,000 customers. PECO will construct, own, and operate the Forge Springs Substation, which includes the proposed control equipment enclosure

with lavatory. The Project has a scheduled construction start date of the second quarter of 2026 to meet an in-service date of the fourth quarter of 2027.

7. The proposed Forge Springs Substation control equipment enclosure with lavatory will be approximately 75 feet by 50 feet. It will contain substation electric controls, relays, metering, and communications equipment necessary for the control and operation of the Forge Springs Substation and a lavatory for use when PECO personnel are on-site to service the substation equipment. Wall-mounted HVAC equipment will be housed within the control equipment enclosure with lavatory to provide the climate control required for safe and reliable operation of the equipment. The control equipment housed within the enclosure is not designed to be exposed to the elements and therefore must be housed within an enclosure to ensure it can perform its designed function for the duration of its useful life. The control equipment enclosure with lavatory will be an unmanned facility, serviced periodically by technicians, and accordingly will not increase the vehicular traffic otherwise already associated with the substation. Instead, on an around-the-clock schedule of 24 hours, seven days a week, PECO will remotely monitor the new control equipment enclosure with lavatory, along with the entire substation. A site map showing the location of the proposed substation control/equipment enclosure with lavatory is attached hereto as Exhibit "A."

8. PECO and Upper Merion Township entered into an Agreement in Lieu of Zoning, SALDO, and Subdivision Application/Approval ("Agreement") dated March 13, 2025. The Agreement acknowledges, as set forth more fully in Section III below, that Pennsylvania Public Utility Code and case law preempt municipalities from regulating a public utility. However, PECO agreed to submit for informational purposes only and thereafter record a plan of consolidation for the four parcels of land comprising the Project. PECO also confirmed that it would pursue Commission

approval of the equipment enclosure containing a lavatory to be constructed in the Forge Springs Substation. No approval, special exception, or variance of Upper Merion Township ordinances was required with respect to the construction of the new Forge Springs Substation, and PECO is not required to obtain any construction/building permits from Upper Merion Township. Notwithstanding the foregoing, PECO will comply with applicable Upper Merion Township ordinances related to the following matters, if applicable: NPDES, floodplain, storm water management, grading, soil and erosion, demolition, Pennsylvania Department of Transportation highway occupancy permits, and water and sewer connections.

9. PECO has identified no adverse impacts to the environment due to the control equipment enclosure with lavatory or any environmental requirements for the enclosure that require a determination by a Commonwealth agency.

10. As described in the LON, a Pennsylvania Natural Diversity Inventory was required as part of the NPDES permit application that identified potentially threatened or endangered species in the vicinity of the Project. The following potential or actual presence of species of concern were identified as potentially present in the project area: Pennsylvania Game Commission (“PAGC”) identified the potential presence of peregrine falcon; Pennsylvania Department of Conservation and Natural Resources (“PADCNR”) identified the potential presence of Southern Red Oak; and Pennsylvania Fish and Boat Commission (“PAFBC”) identified the Northern Red-bellied Cooter. However, further review by PAGC and PADCNR determined that no adverse impacts are expected to the identified species. No species of concern were identified by the U.S. Fish and Wildlife Service. PAFBC requested a habitat assessment for the presence/absence of suitable habitat for the Northern Red-bellied Cooter. DuBois and Associates, LLC (“DuBois”) completed a habitat assessment in May 2025 and found potential nesting habitat and aquatic habitat for the Northern

Red-bellied Cooter in several locations along the proposed transmission right-of-way. DuBois provided the assessment to PAFBC, and the PAFBC then issued a response in September 2025 requiring certain habitat protection and construction monitoring measures for the species. As PECO will comply with the PAFBC recommended habitat protection measures and construction monitoring, PAFBC does not foresee any adverse impacts to Northern Red-bellied Cooters from the Project.

III. REQUEST FOR EXEMPTION FROM LOCAL ZONING AND OTHER REGULATION

11. The proposed Forge Springs Substation control equipment enclosure with lavatory is reasonably necessary for the convenience or welfare of the public in order for PECO to construct, own, and operate the Project as explained in the LON. The only reasonable location to site the equipment enclosure that will be used to control the Forge Springs Substation is within the substation itself.

12. The proposed Forge Springs Substation control equipment enclosure with lavatory will be located within Upper Merion Township and Montgomery County, each of which has enacted regulations pertaining to zoning, pursuant to Article VI of the MPC. Under the Township's zoning ordinance, the Township's zoning requirements do not apply to a "building" where the Commission determines that the situation or use of that "building" is reasonably necessary for the convenience or welfare of the public, consistent with Section 619 of the MPC. Solely for purposes herein and Section 619 of the MPC, the control equipment enclosure with lavatory will be deemed a "building."

13. The Pennsylvania General Assembly intended the Commission to have statewide jurisdiction over public utilities and to foreclose local public utility regulation, including, without limitation, zoning, subdivision, and land development. The lack of authority for a local

municipality to regulate the design, location, or construction of public utility facilities is consistent with a long line of cases holding that public utilities are exempt from local ordinances.¹

14. Pennsylvania courts have established as an enduring principle that municipalities do not have the power to zone with respect to utility structures other than “buildings” that are not necessary for the public convenience or welfare. *Duquesne Light Co. v. Upper St. Clair Township, et al.*, 377 Pa. 323, 105 A.2d 287 (1954); *Newtown Township v. Phila. Elec. Co.*, 140 Pa. Commw. 635, 642, 594 A.2d 834, 837 (Pa. Commw. Ct. 1991) (discussing *Duquesne Light, supra*, and its progeny finding that the MPC § 619 exemption applied to zoning ordinances, subdivision, and land development regulations). If the Commission agrees that the control equipment enclosure with lavatory constituting a “building” is reasonably necessary, the “building” is exempt from local zoning ordinances under the MPC. *Township of Marple v. PECO Energy Co.*, 294 A.3d 965, 972 (2023) (“[A]bsent an express statutory directive to the contrary, municipalities are preempted from regulating public utilities’ operations. . . [Municipalities have] the ability to regulate via local ordinance the location of a building that a public utility wishes to build or use, unless the ‘Commission decide[s] that the present or proposed situation of the building in question is reasonably necessary for the convenience or welfare of the public.’”) (citations omitted); *Del-AWARE Unlimited, Inc. v. Pa. P.U.C.*, 513 A.2d 593 (Pa. Commw. 1986).

¹ See *Duquesne Light Co. v. Monroeville Borough*, 449 Pa. 573, 580, 298 A.2d 252, 256 (1972) (“This Court has consistently held, however, that the Public Utility Commission has exclusive regulatory jurisdiction over the implementation of public utility facilities” (citations omitted)). See, e.g., *County of Chester v. Phila. Elec. Co.*, 420 Pa. 422, 218 A.2d 331 (1966) (holding that regulation by a multitude of jurisdictions would result in “twisted and knotted” public utilities with consequent harm to the general welfare); *Newtown Township v. Phila. Elec. Co.*, 594 A.2d 834, 837 (Pa. Commw. 1991) (noting that “it is clear that no ‘implied’ power exists in the MPC which would allow the Township to regulate [the Philadelphia Electric Company] through its subdivision and land development ordinance”); *Heintzel v. Zoning Hearing Bd. of Millcreek Twp.*, 533 A.2d 832 (Pa. Commw. 1987) (holding that township had no power to regulate, under its zoning ordinance, city’s erection of water tower because that power was under the exclusive jurisdiction of the PUC); *South Coventry Township v. Phila. Elec. Co.*, 504 A.2d 368 (Pa. Commw. 1986) (noting that to possibly subject [the Philadelphia Electric Company] to a miscellaneous collection of regulations upon its system would clearly burden and indeed disable it from successfully functioning as a utility); *Commonwealth v. Del. & Hudson Ry. Co.*, 339 A.2d 155 (Pa. Commw. 1975) (holding that the MPC did not authorize local governments to regulate public utilities in any manner that infringes upon the power of the PUC to so regulate).

15. The MPC Section 619, 53 P.S. § 10619, provides in relevant part:

“This article shall not apply to any existing or proposed building, or extension thereof, used or to be used by a public utility corporation, if, upon petition of the corporation, the Pennsylvania Public Utility Commission shall, after a public hearing, decide that the present or proposed situation of the building in question is reasonably necessary for the convenience or welfare of the public.”

16. Thus, a municipality may not exercise its zoning, subdivision, and land development powers over a public utility control/equipment enclosure with lavatory that constitutes a “building” if the Commission determines, pursuant to MPC § 619, that the “site is reasonably necessary for the public convenience or welfare.” *See, e.g., Petition of Sunoco Pipeline, L.P. for A Finding That A Bldg. to Shelter the Walnut Bank Valve Control Station in Wallace Twp., Chester Cnty., Pennsylvania Is Reasonably Necessary for the Convenience or Welfare of the Pub. Petition of Sunoco Pipeline, L.P. for A Finding That A Bldg. to Shelter the Blairsville Pump Station in Burrell Twp., Indiana Cnty., Pennsylvania Is Reasonably Necessary for the Convenience or Welfare of the Pub.* (hereinafter, “SPLP”), No. P-2014-2411941, 2014 WL 5810345, at *10 (Opinion and Order, Oct. 2, 2014); *accord Petition of Pennsylvania-American Water Company for a Finding on an Expedited Basis that Two Buildings to Shelter Booster Pumps to be Constructed in Dunbar Township, Fayette County, Pennsylvania, are Reasonably Necessary for the Convenience or Welfare of the Public* (hereinafter, “PAWC”), No. P-2014-2513587, 2016 WL 1689629, at *11 (Opinion and Order Apr. 21, 2016); *see also Del. Riverkeeper Network v. Sunoco Pipeline L.P.*, 179 A.3d 670, 679 (Pa. Commw. Ct.), *appeal denied*, 648 Pa. 281, 192 A.3d 1106 (2018) (“In sum, the trial court observed, Pennsylvania courts consistently construe Section 619 narrowly and hold a township has no power to regulate a public utility by zoning ordinances with regard to uses and structures that are not buildings.”).

17. The Commission does not require a public utility to prove that the site it has selected for a control/equipment enclosure with lavatory constituting a “building” is absolutely necessary or that it is the best possible site in order to prove that proposed control/equipment enclosure with lavatory constituting a “building” is reasonably necessary for the convenience or welfare of the public. The utility need only show that the site chosen is “reasonably necessary” for the convenience or welfare of the public. *Marple*, at 972; *Petition of UGI Penn Natural Gas Inc. for a Finding that Structures to Shelter Pipeline Facilities in the Borough of West Wyoming, Luzerne County, To the Extent Considered To be Buildings under Local Zoning Rules, Are Reasonably Necessary for The Convenience or Welfare of the Public*, Docket No. P-2013-2347105 (Order entered Dec. 19, 2013).²

18. The proposed control equipment enclosure with lavatory constituting a “building” will be integral to the operation of the Forge Springs Substation and is therefore reasonably necessary for the convenience and welfare of the public since it will assist in the safe operation of the substation and related equipment for the benefit of the public. In addition, the proposed situation of the Forge Springs Substation control equipment enclosure with lavatory constituting a “building” is reasonably necessary for the public convenience and welfare because the control equipment enclosure with lavatory constituting a “building” will be located directly within the substation it is intended to control. The only logical location to site the control equipment enclosure with lavatory constituting a “building” is within the secure confines of the existing substation for which it is needed.

² The Commission has held that the appropriate scope of inquiry under MPC § 619 is not “whether it is appropriate to place the [public utility facilities] in certain areas, but, rather, . . . whether the buildings proposed to shelter those facilities are reasonably necessary for the public convenience or welfare of the public.” *SPLP, supra*, at *26; *PAWC, supra*, at *10 (proper scope of inquiry is not whether facilities are necessary, “but rather a determination that the buildings are necessary to shelter the facilities”).

19. In *Marple*, the Commonwealth Court directed the Commission to conduct a “constitutionally sound environmental impact review” of the siting two buildings required to support a natural gas reliability station, which was opposed by the Township of Marple. *Marple*, at 973. On remand, the Commission underscored that a Section 619 proceeding is not an evaluation of a utility project that incorporates a building, but is to address the zoning exemption of the building and its siting. *Petition of PECO Energy Co. for a Finding of Necessity Pursuant to 53 P.S. § 10619 that the Siting of Two Buildings Associated with a Gas Reliability Station in Marple Township, Delaware County, is Reasonably Necessary for the Convenience and Welfare of the Public*, Docket No. P-2021-3024328 (Order entered Sept. 26, 2024), pp. 57-60.

20. As described above, the only reasonable siting of the control equipment enclosure with lavatory is within the substation itself, and there are no adverse environmental impacts of the building or Commonwealth agency determinations required for the building. Furthermore, the Township has already agreed that no approval, special exception or variance is required for the substation, including the control equipment enclosure with lavatory. As set forth in the LON, PECO has also taken actions to mitigate environmental impacts of the entire Project.

21. The Commission should therefore find that because PECO’s proposed control equipment enclosure with lavatory constituting a “building” is reasonably necessary for the public convenience and welfare, it is exempt from local zoning ordinance pursuant to Section 619 of the MPC.

22. Pursuant to 52 Pa. Code § 5.41(b), PECO is serving this Petition upon the Office of Consumer Advocate, the Bureau of Investigation and Enforcement, and the Office of the Small Business Advocate. Additionally, PECO is serving counsel for all municipalities in which the proposed Forge Springs Substation building is intended to be constructed so that they have direct

notice of PECO's request for confirmation of an exemption from such local zoning regulation for the construction of the proposed control/equipment enclosure with lavatory constituting a "building" at the Forge Springs Substation. PECO will serve additional parties as may be directed by the Commission.

IV. CONSOLIDATION

23. For the reasons specified above and in the LON, PECO requests that this Petition be consolidated, under the Commission regulations at 52 Pa. Code § 5.81, for hearings and disposition with the LON since the two pleadings relate to the same subject matter (i.e., the Project) and are otherwise interrelated.

24. Consolidation of the Petition and the LON for disposition and for purposes of hearing, briefing, and decision (if needed) promotes administrative efficiency. The Commission typically exercises its consolidation authority if, as in the instant case, it can avoid creating an additional, unnecessary and expensive hurdle.

25. PECO's requested consolidation approach is entirely consistent with Pennsylvania law on consolidation and is within the Commission's discretionary authority.

26. For the foregoing reasons, PECO requests that this Commission consolidate this Petition and the LON for disposition, and if necessary, before one Administrative Law Judge for hearing and recommended decision, in accordance with Section 5.81 of the Pennsylvania Code. 52 Pa. Code § 5.81.

V. CONCLUSION

WHEREFORE, for all the foregoing reasons, PECO respectfully requests that the Commission find, in accordance with Section 619 of the MPC, 53 P.S. § 10619, the proposed situation of the control equipment enclosure with lavatory constituting a "building" in the Forge Springs Substation is reasonably necessary for the convenience and welfare of the public and

therefore exempt from all local zoning and other regulation under Pennsylvania law and specifically exempt from local zoning regulation of Upper Merion Township, Montgomery County, Pennsylvania. PECO also requests the Commission grant any and all other approvals necessary to carry out the relief requested in this Petition.

Respectfully submitted,



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Phone: 267-533-1775
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Dated: September 9, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company for a :
Finding of Necessity Pursuant to 53 P.S. § :
10619 that the Substation Control Building : Docket No. P-2025-_____
Associated with the Forge Springs Substation :
in Upper Merion Township, Montgomery :
County, Is Reasonably Necessary for the :
Convenience and Welfare of the Public :**

CERTIFICATE OF SERVICE

I hereby certify that on this date, the parties listed below that are entitled to receive a copy of the above-captioned Petition pursuant to 52 Pa. Code § 57.74 were served by certified mail, return receipt requested, a copy of the above-captioned Petition.

Office of Consumer Advocate
555 Walnut Street
Forum Place – 5th Floor
Harrisburg, PA 17101-1921
ra-oca@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

NazAarah Sabree
Small Business Advocate
Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov

Montgomery County Commissioners
P.O. Box 311
Norristown, PA 19404-0311
Attn: Jamila Winder, President Commissioner

Montgomery County Planning Commission
P.O. Box 311
Norristown, PA 19404-0311
Attn: Steven N. Kline, Chair

Benjamin H. Field, Esq.
Montgomery County Solicitor
P.O. Box 311
Norristown, PA 19404-0311

Upper Merion Township
175 West Valley Forge Road
King of Prussia, PA 19406-1802
Attn: Marvin Meneeley, Chairperson

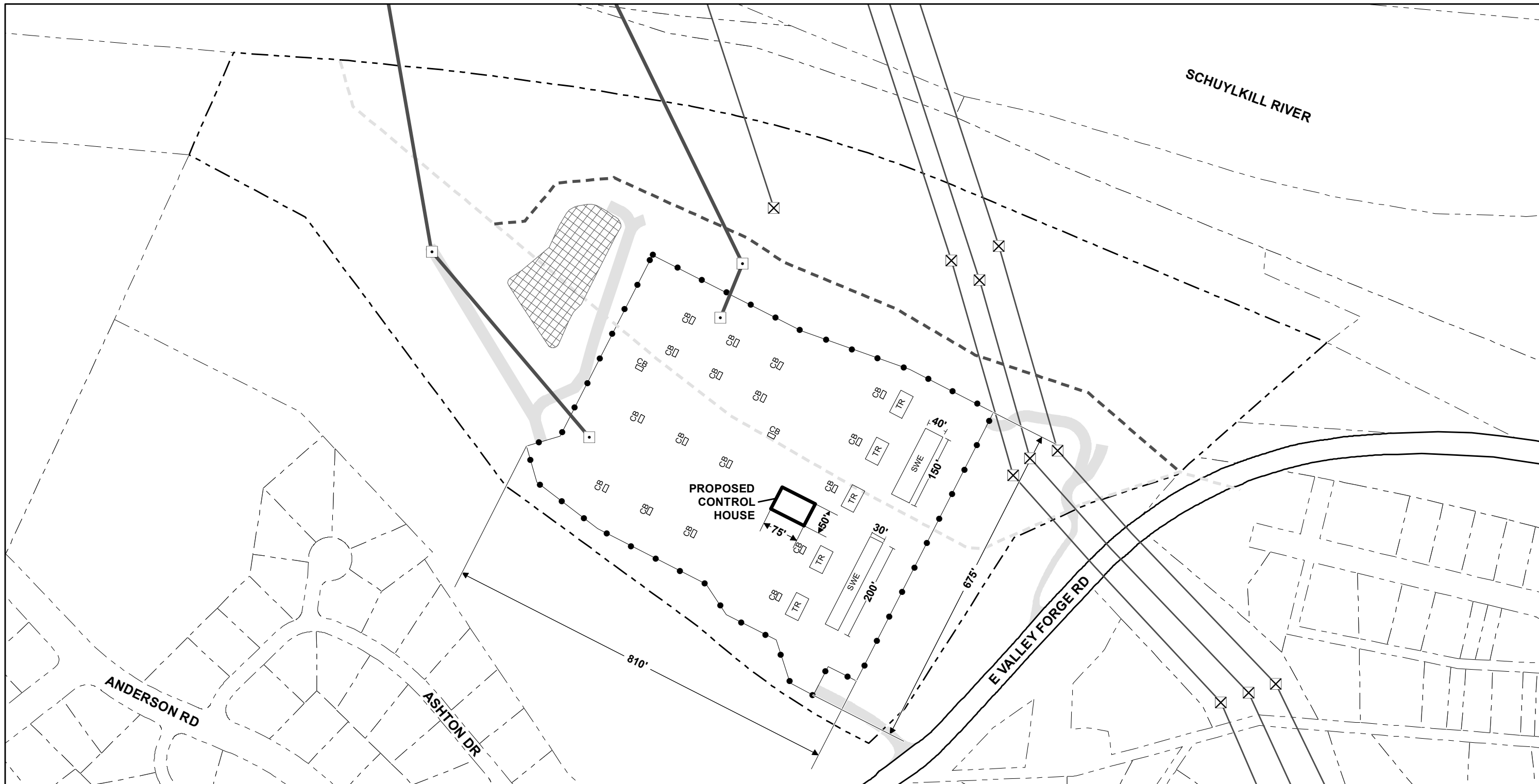
Montgomery Country Conservation District
143 Level Road
Collegeville, PA 19426
Attn: Jessica Buck, District Manager

John Walko, Esq.
Upper Merion Township Solicitor
Kilkenny Law, LLC
519 Swede St.
Norristown, PA 19401

Dated: September 9, 2025



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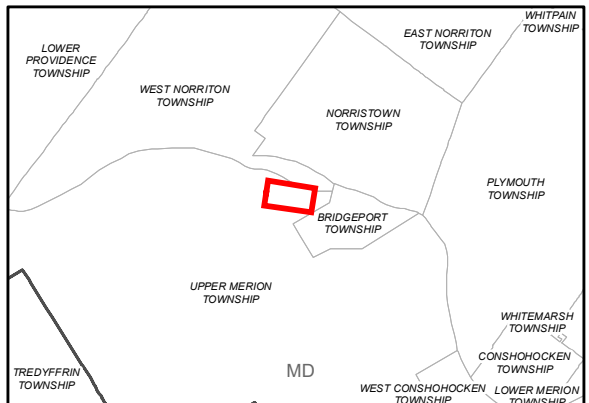
Legend	
	PROPOSED TOWER
	EXISTING TOWER
	PROPOSED TRANSMISSION LINE
	EXISTING TRANSMISSION LINE
	PROPOSED PIPELINE
	EXISTING PIPELINE
CB	CIRCUIT BREAKER
TR	TRANSFORMER
SWE	SWITCHGEAR ENCLOSURE
	PROPOSED CONTROL HOUSE
	PROPOSED SUBSTATION FENCELINE
	PROPOSED ACCESS
	PARCEL BOUNDARY
	PROPOSED BASIN

REFERENCES:

- FORGE SPRINGS SUBSTATION PARCEL BOUNDARY TAKEN FROM DRAWING 032002073 "BARBADOES SOUTH RETTEW ALTA" BY RETTEW ASSOCIATES, 05/26/2022.
- EXISTING PIPELINE FIELD LOCATED BY BADGER DAYLIGHTING.
- PROPOSED SUBSTATION CONTROL HOUSE AND FENCELINE PROVIDED BY POWER ENGINEERS, INC. 01/14/2025
- PROPOSED ACCESS, BASIN, AND PIPELINE TAKEN FROM DRAWING FS-02 "GENERAL ARRANGEMENT AND STORMWATER MANAGEMENT" BY AECOM, 1/29/2025
- PROPOSED 230 KV TOWERS AND TRANSMISSION LINES PROVIDED BY POWER ENGINEERS, INC 02/04/2025.
- PUBLICLY AVAILABLE PARCEL DATA OBTAINED FROM MONTGOMERY COUNTY, PA WAS PUBLISHED IN MARCH 2024.

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COORDINATE SYSTEM: NAD 1983 STATEPLANE PENNSYLVANIA SOUTH FIPS 3702 FEET
PROJECTION: LAMBERT CONFORMAL CONIC: UNITS: FOOT US



PUC Exhibit Plan Forge Springs Substation Project Upper Merion Township, Montgomery County, Pennsylvania PECO, an Exelon Company	
Prepared By: BSF	Checked By: BPS
Job: 60733034	Date: 7/15/2025


**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company for a :
Finding of Necessity Pursuant to 53 P.S. § :
10619 that the Situation of a Control Building : Docket No. A-2025-_____**
**Associated with the Forge Springs Substation :
in Upper Merion Township, Montgomery :
County, Is Reasonably Necessary for the :
Convenience and Welfare of the Public :**

VERIFICATION

I, Drew T. Davis, hereby declare that I am the Vice President, Transmission and Substation for PECO Energy Company; that, as such, I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Petition are true and correct to the best of my knowledge, information, and belief; and that I make this verification subject to the penalties of 18 Pa. C.S.A. § 4904 pertaining to false statements to authorities.

DATE: 09/05/2025



Drew T. Davis
Vice President, Transmission and Substation