COMMONWEALTH OF PENNSYLVANIA

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September 19, 2025

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

Re: Petition of PECO Energy Company for Approval of Its Electric Long-Term Infrastructure Improvement Plan for the Period January 1, 2026 through December 31, 2030

Docket No. P-2025-3056987

Dear Secretary Homsher,

Enclosed for filings are the Comments of the Office of Consumer Advocate in the above-referenced proceeding, which have also been served as evidenced by the attached Certificate of Service.

Respectfully submitted,

/s/ David T. Evrard
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Enclosures
cc: Certificate of Service

CERTIFICATE OF SERVICE

Re: Petition of PECO Energy Company for Approval of Its Electric Long-Term Infrastructure Improvement Plan for the Period January 1, 2026 through December 31, 2030	:	Docket No. P-2025-3056987

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Comments, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 19th day of September, 2025.

SERVICE BY E-MAIL ONLY

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Dated: September 19, 2025

Respectfully Submitted,

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BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Petition of PECO Energy Company for Approval of Its Electric Long-Term Infrastructure Improvement Plan for the Period January 1, 2026 through December 31, 2030	: : : : : : :	Docket No. P-2025-3056987

COMMENTS OF THE
OFFICE OF CONSUMER ADVOCATE

On August 20, 2025, PECO Energy Company – Electric Division (PECO or Company) filed with the Public Utility Commission (PUC or Commission) its third Long-Term Infrastructure Improvement Plan (LTIIP III or Plan) for the period 2026 through 2030. PECO is seeking Commission approval of the Plan. Under the Plan, PECO proposes to make further capital investments, above those made under its LTIIP I and LTIIP II plans, of $1.97 billion to construct reliability-related improvements in four principal categories: 1) storm hardening and resiliency; 2) replacing underground cable and equipment exhibiting increased risk of failure; 3) replacing older and degraded substation equipment; and 4) replacing and upgrading smart meters that are approaching obsolescence with a higher probability of failure.

The Office of Consumer Advocate (OCA) submits these comments pursuant to the 30-day comment period provided for newly filed LTIPP plans under the Commission's regulations at 52 Pa. Code Section 121.4(c).

The LTIIP III Plan Document identifies nine programs pursuant to which PECO intends to make investments under the Plan. The two programs of interest to the OCA are the Customers Experiencing Multiple Interruptions (CEMI) Areas Program and the Aerial Infrastructure Resiliency (AIR) Areas Program. PECO explains that under the CEMI Program, it is able to identify circuits and geographic areas where customers experience higher-than-average annual interruptions. Using a CEMI index to track the number of customers who have had more than four interruptions in a year, the Company can determine where it should direct increased investment under LTIIP III. PECO states that under CEMI it will implement enhanced storm hardening and resiliency measures to counter weather and the impact of vegetation, which PECO identifies as the principal drivers of interruptions in its service territory as measured by the CEMI index.

PECO states that it will target CEMI-identified areas for upgrades such as replacing or upgrading poles, cross-arms, lightning arrestors, line hardware and associated equipment that is obsolete, degraded or otherwise not suited to withstanding more frequent and severe storms, high winds and the impact of falling trees or limbs. In selected areas of high tree density, PECO will install new primary wires in a compact, high-strength configuration that have the ability to withstand impacts from falling trees and limbs. The Company says it will explore selective aerial and underground relocations when it is not effective to reconductor lines in the same location.

Under the AIR Areas Program, PECO identifies high-risk aerial areas and replaces aging infrastructure with equipment that is designed to withstand wind and ice loading consistent with construction guidelines defined by the National Electric Safety Code. According to PECO, equipment will be replaced with newer, longer-lasting, more technically sophisticated versions made with the most up-to-date materials. The strength of the new installations will improve

reliability in normal weather conditions and provide enhanced resistance to storm-related damage (i.e., storm hardening).

With respect to both the CEMI and AIR Programs, the OCA's comments are informed by the observations made by the Commission in its 2024 Pennsylvania Electric Reliability Report (Reliability Report). Specifically, the Commission addresses the challenges to reliability posed by storm activity:

> … electric reliability and resilience in Pennsylvania appear to be most challenged during storm activity that brings down off-right-of-way (OROW) trees, and overhanging limbs from canopy trees above the clearing zones within the right-of-way (ROW) onto the distribution lines…This is the direct result of vegetation management policies, programs and storm activity. Storm activity acts upon the vulnerability of weakened trees in the overhanging canopy, and OROW trees. Since 2015, and continuing throughout 2024, vegetation has been the number one cause of outages and lost customer-minutes in Pennsylvania… EDCs should consider both controllable (primarily equipment failure and in-ROW vegetation) and uncontrollable (OROW vegetation) outage causes in reliability and resiliency planning. For controllable outage causes, EDCs can undertake programs through LTIIPs, regular capital improvement projects, and effective and prudent vegetation management practices to reduce controllable outage causes as much as possible. Reliability Report at *v*.

The Commission goes on to recommend steps EDCs should consider to protect conductors within the ROW from threats that may occur from outside the ROW:

> …EDCs can also address OROW vegetation issues by working to improve the reliability and performance of their facilities within the ROW. *EDCs should consider utilizing methodologies to protect conductors within the ROW from hazards that may come from OROW, such as targeted undergrounding, covered overhead conductors (i.e., tree wire), and hybrid undergrounding (an emergent technology involving moving conductors low to the ground or in shallow underground conduit, which may be less costly as compared to full undergrounding.)* Any protection method's effectiveness must be balanced with the impacts of the costs on ratepayers. However, EDCs could utilize LTIIPs and fully projected future test years in base rate cases to propose such initiatives, even as pilot programs, and receive feedback from stakeholders on costs versus expected benefits. (Emphasis added) Reliability Report at *vi*.

The OCA submits that the Commission's recommendation for targeted and hybrid undergrounding should be given strong consideration by EDCs as part of their storm hardening and resiliency efforts. Consideration of undergrounding storm-vulnerable facilities that have experienced multiple interruptions should be a central element of EDC reliability and resiliency planning.

As noted above, under its CEMI Plan, PECO states it will explore underground relocations when it is "not effective to reconductor lines in the same location." This seems to indicate rather limited consideration of undergrounding as an option for storm hardening at-risk facilities.

Under the AIR Program, PECO proposes to replace vulnerable aerial facilities with other, albeit stronger, aerial facilities. It does not appear that undergrounding is a consideration as part of this program.

In keeping with the Commission's comments in the 2024 Reliability Report, the OCA submits that consideration of the undergrounding of chronically at-risk aerial facilities should be a core feature of its storm-hardening and resiliency planning. It should not be a secondary or last resort consideration. Undergrounding should be reflected in EDC LTIIPs, such as the instant PECO LTIIP III. The Commission should direct PECO to incorporate a more complete analysis of the potential for undergrounding vulnerable facilities into LTIIP III.

The OCA recognizes that undergrounding options are typically more costly than the replacement or upgrading of aerial facilities. However, the frequency of disruption of such facilities and the expense of replacing or upgrading them, must be part of the analysis. Further, a complete analysis of costs/benefits in this area should include the Value of Lost Load (VOLL), not only to the utility but also to customers who may experience economic losses due to outages. The

OCA encourages PECO to engage in an undergrounding analysis whenever faced with distribution system components that have failed multiple times as the result of storm or high wind activity.

Respectfully Submitted,

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