

Morgan Lewis

Kenneth M. Kulak

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

October 1, 2025

VIA ELECTRONIC FILING

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

**Re: Letter of Notification of PECO Energy Company Filed Pursuant to
52 Pa. Code §§ 57.71 *et seq.* for Approval of the Siting and Construction of the
220-09 Line Tap Project Located in East Whiteland Township, Chester
County, Pennsylvania
Docket No. A-2025-3054731**

Dear Secretary Homsher:

Enclosed for filing in the above-captioned proceeding is PECO Energy Company's Second Response to the Data Requests of the Bureau of Technical Utility Services ("TUS"), Question Nos. A-5 and A-6.

On April 14, 2025, PECO filed a Letter of Notification in the above-captioned docket requesting Commission approval to construct a new high voltage distribution tap from an existing transmission line and related structures (the "Project") to serve a new customer from PECO's existing Planebrook Substation in East Whiteland Township, Chester County, Pennsylvania. On June 5, 2025, PECO submitted responses to Data Requests A-5 and A-6 explaining that PJM Interconnection LLC ("PJM") began a "do no harm" ("DNH") reliability screening analysis for the Project on March 14, 2025. PECO also committed to providing TUS with the results of the DNH analysis and the project ID number assigned to the Project after PJM completed the analysis. PECO is providing the attached Affidavit, which explains that PJM provided PECO with notice that PJM has completed its DNH analysis with no violations by the Project and the Project has been assigned a project ID number.

PECO respectfully requests Commission review and approval of the Letter of Notification on or before the October 9, 2025 Public Meeting in order to allow construction to commence in November 2025.

As indicated on the enclosed Certificate of Service, copies have been served upon all parties of record.

Morgan, Lewis & Bockius LLP

2222 Market Street
Philadelphia, PA 19103
United States

T +1.215.963.5000
F +1.215.963.5001

If you have any questions, please call me directly at 215.963.5384.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kenneth M. Kulak". The signature is written in a cursive style with a large initial 'K'.

Kenneth M. Kulak

KMK/ap
Enclosure

c: Per Certificate of Service (w/encls.)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Letter of Notification of PECO Energy :
Company Filed Pursuant to 52 Pa. Code §§ :
57.71 et seq. for Approval of the Siting and : Docket No. A-2025- 3054731
Construction of the 220-09 Line Tap :
Project Located in East Whiteland :
Township, Chester County, Pennsylvania :
:**

AFFIDAVIT OF DREW DAVIS

1. My name is Drew Davis. My business address is PECO Energy Company, 2301 Market Street, Philadelphia, PA 19103.

2. I am employed by PECO Energy Company (“PECO”) as the Vice President of Transmission and Substations.

3. On April 14, 2025, PECO filed a Letter of Notification in Docket No. A-2025-3054731 requesting Commission approval to construct a new high voltage distribution tap from an existing transmission line and related structures (the “Project”) to serve a new customer from PECO’s existing Planebrook Substation in East Whiteland Township, Chester County, Pennsylvania. PECO explained that a new customer is currently planning to construct the Green Fig Data Center on property directly adjacent to the Planebrook Substation within PECO’s service territory and has requested service from PECO. The proposed Project is necessary to allow PECO to provide up to approximately 150 MW service from PECO’s existing Planebrook Substation to the Green Fig Data Center.

4. On June 5, 2025, PECO submitted a response to data request TUS-1-6 explaining that PJM Interconnection LLC (“PJM”) began a do no harm analysis for the Project on March 14, 2025. PJM studied the Project as “Phase 1,” modeling 150 MW of load. PECO had communicated to PJM that PECO is considering an additional customer request to provide an additional 140 MW service to the Green Fig Data Center for a total of 290 MW. In combination with Phase 1, PJM modelled 290 MW of load in the do no harm analysis as a separate “Phase 2.”

5. Only Phase 1 is subject to the Letter of Notification in Docket No. A-2025-3054731. PECO will seek any required approvals for transmission lines and structures related to Phase 2 in a separate filing.

6. On September 24, 2025, PJM provided an email to PECO confirming that the Project (i.e., Phase 1 for 150 MW of load) would pass the do no harm analysis. PJM separately identified that Phase 2 would not pass the do no harm analysis at this time, but that PJM could confirm Phase 1 and issue a supplemental ID number for the Project at this time. To be clear, the Project, identified as Phase 1 by PJM, passes the do no harm analysis and is not impacted by PJM’s further and separate discussions with PECO concerning Phase 2, which is not subject to PECO’s Letter of Notification in Docket No. A-2025- 3054731. PECO will coordinate with PJM for further analysis of Phase 2 prior to submitting any additional application to the Commission related to possible increased capacity to the Green Fig Data Center.

7. On September 26, 2025, PJM assigned supplemental ID number s3730.1 to the Project based on the satisfactory completion of the do no harm analysis.

8. PECO is providing PJM’s emails dated September 24, 2025, and September 26, 2025, as Exhibit 1 to this affidavit.

I, Drew T. Davis, hereby state 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).



DATE: 09/30/2025

Drew T. Davis
Vice President, Transmission and Substation

From: Graham, Katherine <Katherine.Graham@pjm.com>
Sent: Friday, September 26, 2025 2:35 PM
To: Papp, Joseph:(Exelon); Tesfa, Nebiat; Bensala, Tarik
Cc: Malcolm, Jack F:(Exelon); Wharton, Matthew J.
Subject: RE: M-3 DNH Question

Hi Joe,

The **S # for Phase 1 of PE-2024-008 is going to be s3730.1**. The S # for Phase 2 will be issued once we confirm the violations we are seeing are not being caused by the project. I think sometime next week would be a good estimate for the timeline for this.

Thanks,

Katherine

From: Papp, Joseph:(Exelon) <joseph.papp@peco-energy.com>
Sent: Thursday, September 25, 2025 7:23 AM
To: Graham, Katherine <Katherine.Graham@pjm.com>; Tesfa, Nebiat <Nebiat.Tesfa@pjm.com>; Bensala, Tarik <Tarik.Bensala@pjm.com>
Cc: Malcolm, Jack F:(Exelon) <Jack.Malcolm@exeloncorp.com>
Subject: RE: M-3 DNH Question

 **External Email! Think before clicking links or attachments.**

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

Katherine,

Thank you for the explanation and thank you for sending the cases. We would like to have the supplemental ID # for Phase 1 issued now and then Phase 2 once we invalidate the overloads. Would you be able to send the Phase supplemental ID # today? We are in a bit of a time crunch to provide phase 1 DNH results to the PUC to complete the permitting process. It would be greatly appreciated if you could provide that soon.

I believe the idvs were intended to be added to the DNH as Phase 1 or Phase 2. They should not have not have both been applied in the same case. Jack Malcolm will confirm that.

Thank you,

Joseph Papp, PE

(he, him, his)

Sr Manager Transmission Regional Planning (ACE, DPL, PECO)

Joseph.papp@exeloncorp.com

T 667 313 1081

M 610 547 4913

exeloncorp.com

From: Graham, Katherine <Katherine.Graham@pjm.com>**Sent:** Wednesday, September 24, 2025 9:48 PM**To:** Papp, Joseph:(Exelon) <joseph.papp@peco-energy.com>; Tesfa, Nebiat <Nebiat.Tesfa@pjm.com>; Bensala, Tarik <Tarik.Bensala@pjm.com>**Subject:** RE: M-3 DNH Question

Hi Joe,

We have two idv's that PECO provided – one titled for Phase 1 and the other for Phase 2. In Phase 1, a load of 150MW is added to the case. In Phase 2, two loads are added to the same bus and sum to 290MW. I am confirming with our consultants, but I believe we applied first Phase 1 and then Phase 2 of the idv's, meaning we modeled the 290MW load at the end. Please note – Applying Phase 1 and then Phase 2 idv's sequentially results in a different topology (see below). I don't think this is what would have had an effect on the results like this, but **please let us know which topology is correct (Apply Phase 1 idv then Phase 2 idv OR just Apply Phase 2 idv)?**

Since Phase 1 idv only adds 150MW, and since the overloads are so minor, **we believe that at least Phase 1 of the project would pass.** In this case, we could issue a supplemental ID # for this phase of the project now, and then issue the Phase 2 supplemental ID once we confirm that the overloads are invalid. Let us know if this sounds okay.

I also have the cases we used for this, and I will send those over to you now via Secure Share. I believe that the issues with the Phase 2 projects are not due to the loads but are rather due to different flows in this case versus the 2030 case.

Katherine Graham

From: Papp, Joseph:(Exelon) <joseph.papp@peco-energy.com>**Sent:** Tuesday, September 23, 2025 12:04 PM**To:** Graham, Katherine <Katherine.Graham@pjm.com>; Tesfa, Nebiat <Nebiat.Tesfa@pjm.com>; Bensala, Tarik <Tarik.Bensala@pjm.com>**Subject:** M-3 DNH Question

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Katherine, Nebiat and Tarik,

Can you provide some clarity if PJM studies the initial loading of our M-3 submissions? Our solutions have included an initial load and ultimate load. Does PJM only study the initial and ultimate load? Specifically if we have a phase 1 served via a temporary line tap and a phase 2 with the ultimate load and permanent configuration. Is the initial tap studied in DNH?

Thanks,

Joseph Papp, PE

(he, him, his)

Sr Manager Transmission Regional Planning (ACE, DPL, PECO)

Joseph.papp@exeloncorp.com

T 667 313 1081

M 610 547 4913



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Letter of Notification of PECO Energy :
Company Filed Pursuant to 52 Pa. Code §§ :
57.71 et seq. for Approval of the Siting and :
Construction of the 220-09 Line Tap Project : Docket No. A-2025-3054731
Located in East Whiteland Township, :
Chester County, Pennsylvania :**

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the **Supplemental 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
Pennsylvania 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
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
nsabree@pa.gov

Dated: October 1, 2025



Kenneth M. Kulak
Morgan Lewis & Bockius LLP
2222 Market Street
Philadelphia, PA 19103-3007
(215) 963-5384
ken.kulak@morganlewis.com