

# Morgan Lewis

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## VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor North  
Harrisburg, PA 17120

**Re: Application of PECO Energy Company to Acquire Certain Property  
Rights from Calpine Mid Merit, LLC  
Docket No. A-2025-3055493**

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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-6 to A-8.

As indicated on the enclosed Certificate of Service, copies of the responses 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.)

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of PECO Energy Company to :  
Acquire Certain Property Rights from :           Docket No. A-2025- 3055493  
Calpine Mid Merit, LLC :**

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

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**TUS-A-6:**

**Reference the Application, Paragraph 6. Please explain any rate making impacts associated with the proposed transaction.**

**RESPONSE:**

The cost of the easements purchased will be part of rate base in PECO's Wholesale Transmission Formula Rate calculations under FERC jurisdiction as real property used to provide transmission service under the PJM tariff.

**TUS-A-7:**

**Reference the Application, Paragraph 8. Please provide a detailed explanation as to why the 5034 Line will be tied into the Bramah Substation.**

**RESPONSE:**

As described in detail in PECO's July 25, 2025 Letter of Notification filing at Docket No. A-2025-3056499, PECO has proposed to rebuild and relocate a short section of the existing 5034 Line to allow tie-in to a new 500/230 kV transmission substation that will be constructed by Transource Pennsylvania LLC ("Bramah Substation") within Peach Bottom Township, York County, Pennsylvania (hereinafter, the "Tie-In Project"). Specifically, PECO proposes cutting the existing 5034 Line into two segments that will each connect to Bramah Substation. The section between the York Substation and Bramah Substation will retain the 5034 Line designation. The section between Bramah Substation and Peach Bottom South Substation will be temporarily renamed the 5074 Line, which will be connected to the 5014 Line and renamed the 5014 Line.

The Tie-In Project is a critical step in enabling transmission projects directed by PJM Interconnection, L.L.C. ("PJM") (the "Reliability Projects").<sup>1</sup> As described in the Commission-approved Brandon Shores Application and PJM 2022 Reliability Window #3 Application for the Reliability Projects, PJM designated PECO to construct several new transmission lines to mitigate significant and widespread reliability issues in the Mid-Atlantic region and to foster needed generation additions and retirements as well as load growth on the PJM system. The Commission has also issued separate approvals for the Bramah Substation.<sup>2</sup>

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<sup>1</sup> The Reliability Projects include the transmission lines and related facilities associated with PECO's proposed Brandon Shores Retirement Mitigation Project and PJM 2022 Reliability Window #3 Project. Siting applications for both projects were approved by the Commission by separate orders entered August 28, 2025. *See Application of PECO Energy Co. Filed Pursuant to 52 Pa. Code § 57.71 et seq. for Approval of the Siting and Construction of the Brandon Shores Retirement Mitigation Project Located in Peach Bottom Twp., York Cty., Pa. and Petition for Waiver of 52 Pa. Code § 57.72(C)(10)*, Docket No. A-2024-3051467 (filed September 30, 2024) ("Brandon Shores Application") & Commission Order approving the Brandon Shores Application (Order entered August 28, 2025); *Application of PECO Energy Co. 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 Twp., York Cty., Pa. and Petition for Waiver of 52 Pa. Code § 57.72(C)(10)*, Docket No. A-2024-3051463 (filed September 30, 2024) ("PJM 2022 Window #3 Application") & Commission Order approving the PJM 2022 Window #3 Application (Order entered August 28, 2025).

<sup>2</sup> *See Application of Transource Pennsylvania, LLC for Approval to Offer, Render, Furnish or Supply Electric Transmission service to the Public in the Commonwealth of Pennsylvania*, Docket No. A-2024-3049272 (Order entered December 19, 2024); *Petition of Transource Pennsylvania, LLC for Confirmation of an Exemption from Local Zoning Regulation and for the Construction of Buildings in connection with the construction of a proposed Substation in Peach Bottom Township, York County, Commonwealth of Pennsylvania*, Docket No. P-2024-3049273 (Order entered April 24, 2025).

As part of the Brandon Shores Application, PECO proposed to construct a new 5042 Line and 220-93 Line that will each tie-in to the northwest of the new Bramah Substation. Without the proposed Tie-In Project, these new lines would have to cross the existing 5034 Line. As part of the Tie-In Project, a short segment of the existing 5034 Line will be moved south out of the intended pathway of the new Brandon Shores Application's transmission lines. The Tie-In Project will also allow for the Brandon Shores Application's new 5012 Line to tie-in to the south of the new Bramah Substation without crossing the existing 5034 Line to the east of the Bramah Substation. Similarly, the Tie-In Project will allow the new 5047 Line and 5041 Line constructed as part of the PJM Reliability Window #3 Application to tie-in to the Bramah Substation, in the northwest and south of the substation, respectively, without crossing the existing 5034 Line.

**TUS-A-8:**

**Reference the Application, Paragraph 13. Please explain whether the transaction will have any impact on PECO's ability to provide service to its customers.**

**RESPONSE:**

The easements that will be acquired by PECO pursuant to the transaction are critical to enabling the Tie-In Project described in PECO's response to TUS-A-7 as well as the Reliability Projects needed to support transmission reliability in the Mid-Atlantic region. As set forth in the Application in this proceeding and in the Brandon Shores Application and the PJM 2022 Window #3 Application, the Reliability Projects are necessary to mitigate significant and widespread reliability issues in the Mid-Atlantic region, including PECO's transmission facilities in southeastern Pennsylvania.



