

Morgan Lewis

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October 7, 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 Conowingo 220-69 Line Located in Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania
Docket No. A-2025-_____**

Dear Secretary Homsher:

Enclosed for filing on behalf of PECO Energy Company (“PECO”) is a Letter of Notification Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for approval to rebuild the existing transmission line and related structures related to the Conowingo 220-69 Line from Plymouth Meeting Substation to Upper Merion Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania that are at the end of life. This Letter of Notification is filed pursuant to the Pennsylvania Public Utility Commission’s regulations at 52 Pa. Code § 57.72(d)(1).

PECO respectfully requests review and approval by the Pennsylvania Public Utility Commission (the “Commission”) of the Letter of Notification on or before the January 29, 2026 Public Meeting in order to allow construction to commence in February 2026.

PECO’s Letter of Notification includes the following **CRITICAL ELECTRICAL INFRASTRUCTURE INFORMATION** (“CEII”) attachment:

CEII/CONFIDENTIAL Attachment 3

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Matthew Homsher
October 7, 2025
Page 2

Attachment 3 contains CEII information and is marked “**CONFIDENTIAL – CEII RESTRICTED.**” PECO requests that the material that has been labeled “**CONFIDENTIAL – CEII RESTRICTED**” be given confidential treatment by the Commission, including its various offices and bureaus. PECO also requests that the confidential materials be excluded from the Commission’s public document folder and that the confidential copies not be disclosed to the public. Attachment 3 will be filed separately with the Commission.

PECO has paid the associated \$350.00 filing fee.

Copies of the Letter of Notification and accompanying public attachments are being served upon the persons as required by 52 Pa. Code § 57.74 and indicated on the enclosed Certificate of Service. The confidential material will be sent via Federal Express to the Secretary.

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: 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-_____
Construction of the Conowingo 220-69 Line :
Located in Plymouth Township and Upper :
Merion Township, Montgomery County, :
Pennsylvania :**

**LETTER OF NOTIFICATION OF
PECO ENERGY COMPANY**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PECO Energy Company (“PECO” or the “Company”) hereby files this Letter of Notification, pursuant to 52 Pa. Code § 57.72(d) requesting approval by the Pennsylvania Public Utility Commission (the “Commission”) to rebuild the existing transmission line and related structures associated with the Conowingo 220-69 Line (hereinafter, the “Project”) from the Plymouth Meeting Substation to the Upper Merion Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania that are at end of life. The Project will occur entirely within PECO’s existing transmission right-of-way. PECO respectfully requests review and approval of the Letter of Notification by the Commission on or before the January 29, 2026 Public Meeting in order to allow construction to commence in February 2026.

In support therefore, PECO states as follows:

I. INTRODUCTION AND OVERVIEW

1. This Letter of Notification 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 Street
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

Kenneth M. Kulak
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2222 Market Street
Philadelphia, PA 19103-3007
(215) 963-5384
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4. PECO furnishes electric service to approximately 1.7 million electric customers and serves 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. The proposed Project is necessary to support the reliability of PECO's transmission system by replacing facilities of the existing 220-69 Line that are at end of life.

6. The estimated cost to design and construct the Project is approximately \$50.2 million. Of that cost, \$13.5 million is attributed to materials (new conductor/hardware, optical ground wire, structures, foundations, substation equipment). The remaining costs are attributable

to direct labor—primary engineering and design, clearance reviews, and electrical/civil construction—and allocated to PECO overhead and management costs. PECO will own, finance, and build the proposed Project. The Department of Energy will reimburse \$7 million of the above cost utilizing funding from the Infrastructure Investment and Jobs Act. The Department of Energy has partially reimbursed PECO on a monthly basis totaling \$169,337, with the last reimbursement received on May 30, 2025.

7. The Project has a scheduled construction start date in February 2026 to meet an in-service date of December 30, 2027. The Project requires a transmission outage. The outage for the reconductoring work is currently scheduled for September 13, 2027, to December 10, 2027.

8. Accompanying this Letter of Notification are the following Attachments that provide additional detailed information regarding the Project:

- Attachment 1 – Plan & Profile Drawings¹
- Attachment 2 – Letter of Notification Filing Checklist
- Attachment 3 – CEII/CONFIDENTIAL Line Ratings

9. This Letter of Notification, including the accompanying Attachments, which are incorporated herein by reference, contains all the information required by 52 Pa. Code § 57.72(d)(4).

II. THE PROJECT

A. Need for the Project

10. Much of the existing 220-69 Line was constructed in the 1920s and thus the structures, foundations, and conductors are all nearing 100 years of service and are at end of life. The need for the Project is related to the condition and age of the 220-69 Line. The Project will

¹ The Plan & Profile Drawings refer to “Phase 1”, which is the Conowingo 220-47 Line approved in Docket No. A-2024-3052612, and “Phase 2”, which is the Conowingo 220-69 Line (i.e., the Project).

support the reliability of PECO's transmission system by removing and replacing the aging infrastructure.

B. Description of the Proposed Project

11. The Project involves rebuilding the existing 220-69 Line, which is a 230 kV transmission line running from the Plymouth Meeting Substation to the Upper Merion Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania. The existing 220-69 Line is approximately 5.6 miles, composed of 34 structures, and entirely located within PECO's existing right-of-way that is approximately 315 feet wide. The new 220-69 Line will be composed of 46 structures.

12. The Project includes the removal of 25 single-circuit, steel lattice towers that are at end of life and rebuilding the existing 220-69 Line with new dual-circuit, weathering steel monopoles that will all be entirely within PECO's existing right-of-way. PECO also proposes to reuse the remaining nine existing dual-circuit, weathering steel monopoles of the existing 220-69 Line, but PECO will replace the conductors for these nine structures for consistency with the rest of the Project. For the entire 220-69 Line, the new circuit will utilize advanced conductors, 959.6 Kcmil Aluminum Conductor, Steel Supported "Suwannee," and will be designed for two conductors per phase such that each of the three phases carrying power will have two wires except for the span between structures 5-2N and 5-3N. All of the structures will be located within PECO's existing right-of-way near the existing center line and the existing structures. *See Attachment 1* for a map of the proposed Project. PECO expects the reliability on the 220-69 Line to increase due to new robust steel structures, conductors, and equipment. PECO anticipates the service life of the new transmission monopoles and appurtenances to be over 70 years. PECO will also replace obsolete equipment at the Plymouth Meeting Substation and Upper Merion Substation including relays, circuit breakers, and disconnect switches to support the new 220-69 Line upgrades.

13. The replacement structures will be between approximately zero to 70 feet taller than the existing structures, as detailed in Attachment 2, Question 6. *See* PECO Attachment 1, which contains the height of each proposed structure as well as the locations of each of the proposed structures in relationship to existing structures.

14. The 220-69 Line is one of 12 circuits along the approximately 60-mile Conowingo right-of-way from the Conowingo Substation in Maryland to the Plymouth Meeting Substation. Only the 220-69 Line is within the scope of this Project and this Letter of Notification. Transmission line ratings will increase by over 50% by utilizing modern technology high-temperature-low-sag conductors. In addition, PECO will make improvements to communications between substations by installing new optical ground wire.

15. There is currently no pending litigation regarding the right-of-way or environmental matters related to the Project.

III. HEALTH AND SAFETY

16. The proposed Project will not create any unreasonable risk of danger to public health or safety. The proposed Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code (“NESC”) minimum standards and all applicable legal requirements. The design, construction and operation of the Project will meet or exceed the requirements specified in the latest revisions of the NESC and all applicable safety standards established by the Occupational Safety and Health Administration (“OSHA”). All work shall be done in accordance with NESC, OSHA and any applicable local, state, or federal requirements.

17. PECO will construct the Project for ground clearances that meet or exceed requirements of its Engineering Practice EPP-2090 OHT Design Clearances. The clearance requirement in EPP-2090 exceeds the requirements of NESC 2023. With respect to vertical

clearances, PECO designs its facilities to meet the NESC rules, plus three additional feet of vertical clearance. Similarly, PECO adds two additional feet of horizontal clearance beyond the NESC horizontal clearance rules.

IV. DESCRIPTION OF THE PROJECT AREA

18. As explained above, the 220-69 Line is one of 12 circuits along the approximately 60-mile Conowingo right-of-way from the Conowingo Substation in Maryland to the Plymouth Meeting Substation. The 220-69 Line is approximately 5.6 miles from Plymouth Meeting Substation to Upper Merion Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania. All construction of the proposed Project will take place within PECO's existing rights-of-way. Therefore, PECO anticipates that the Project will have minimal incremental impact on land use in the Project area.

19. Vegetative cover in the Project Area consists of maintained right-of-way. Before construction begins, vegetation such as brush and grasses will be cleared in the areas designated for new transmission structure installations. Tree trimming and removals will also take place along various locations to accommodate the re-location of the transmission centerline closer to the right-of-way edge. Additionally, vegetation around existing transmission structures will be cleared to facilitate their demolition and removal. PECO will approach maintaining clear rights-of-way for the Project consistent with its overall vegetation management program and in compliance with North American Electric Reliability Corporation reliability standard FAC-003-5, which mandates certain clearances and activities that electric utilities must maintain. Pursuant to PECO's vegetation management program, rights-of-way are managed using integrated vegetation management to promote the establishment of low-growing compatible plant communities. The edges of the right-of-way are periodically maintained by pruning and tree removals to prevent

narrowing over time. Tower areas are regularly maintained to address vegetation that could come into contact with the structure.

20. The closest airport to the Project area is the Wings Field Airport, which is located approximately 2.5 miles from the 220-69 Line. PECO does not anticipate any interference with airport operations because of the distance from the Project area. PECO will file any required documentation with the Federal Aviation Administration and the Pennsylvania Department of Transportation, Bureau of Aviation. PECO will comply with any additional lighting and other visual aids that may be required by these agencies to ensure aviation safety in the region.

21. Parts of the Project site is located in areas of karst topography, which is sinkhole prone. Any karst features that may affect the Project will be identified during the geotechnical investigation and will be addressed as necessary.

22. The Project will not affect any state lands, national parks, state parks, local parks, recreational areas, or natural landmarks.

23. The Project will cross 11 wetland areas and eight streams, including five perennial streams and three intermittent streams. One of the perennial streams is the Schuylkill River. There are no proposed direct or indirect impacts to these features. One palustrine emergent wetland and one intermittent stream will be temporarily impacted by temporary access for pole replacement activities. One Pennsylvania Department of Environmental Protection (“PADEP”) regulated floodway will be permanently impacted by the installation of a new monopole structure (1/2), and PECO will comply with all applicable regulations of PADEP and the U.S. Army Corps of Engineers. No wetlands or streams are proposed to be directly impacted by the installation of new monopoles as a result of the Project. Erosion and sediment control devices and best management practices will be in place to prevent sedimentation and impacts to these features. A Pennsylvania

Natural Diversity Inventory (“PNDI”) was required and identified an avoidance measure from the Pennsylvania Game Commission and U.S. Fish and Wildlife Service for the northern long-eared bat. The avoidance measure, with which PECO will comply, indicates that tree removal may not occur between May 15 to August 15. The PNDI also identified a Pennsylvania Fish and Boat Commission (“PFBC”)–sensitive species. However, upon further review, and after consultation with PECO, the PFBC determined that no adverse impacts are expected to the species of special concern due to the Project.

24. The Project is not expected to have any impacts on communications towers, pipelines, or other utilities.

25. A portion of the Project will cross over Federal Emergency Management Agency Flood Zones A and AE, which are areas that have a 1% annual chance of flooding. Two existing structures (0-2 and 1-2) are located within the 100-year floodplain, and PECO proposes replacing these two structures with four new transmission line monopoles (0/5, 1/2, 1/4, and 2/5). PECO will seek all necessary permits for construction within the floodplain area as necessary and does not anticipate any issues with the proposed locations for these structures.

V. NOTICE

26. Copies of this Letter of Notification will be served on the governmental agencies, municipalities, and other public entities in accordance with 52 Pa. Code § 57.72(d)(3).

27. PECO will provide such additional forms of notice as may be directed by the Commission.

VI. LETTER OF NOTIFICATION

28. PECO is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission's regulations at 52 Pa. Code §§ 57.72(d)(1)(i) and 57.72(d)(1)(v).

29. The proposed Project qualifies for use of a Letter of Notification because the new high-voltage transmission line will be located entirely on PECO's existing transmission line right-of-way, and the Project will not substantially alter the right-of-way. The proposed Project also qualifies for use of a Letter of Notification because the Project is limited to reconstructing an existing transmission line and will not substantially alter the right-of-way as stated above.

30. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the proposed Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71 *et seq.*

VII. CONCLUSION

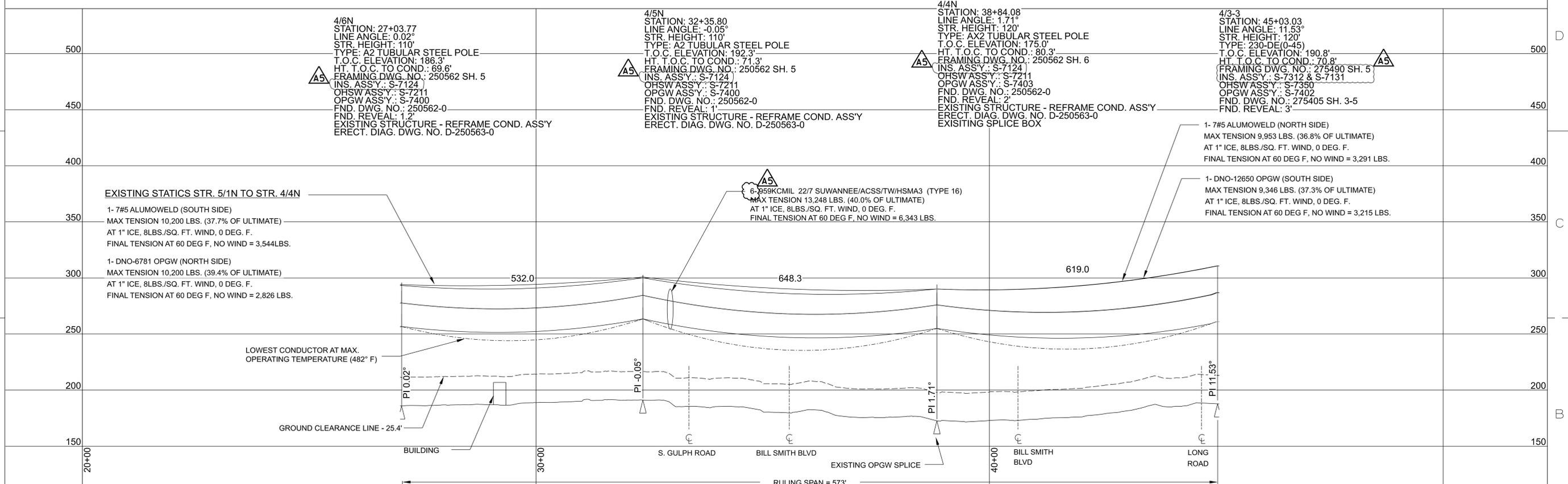
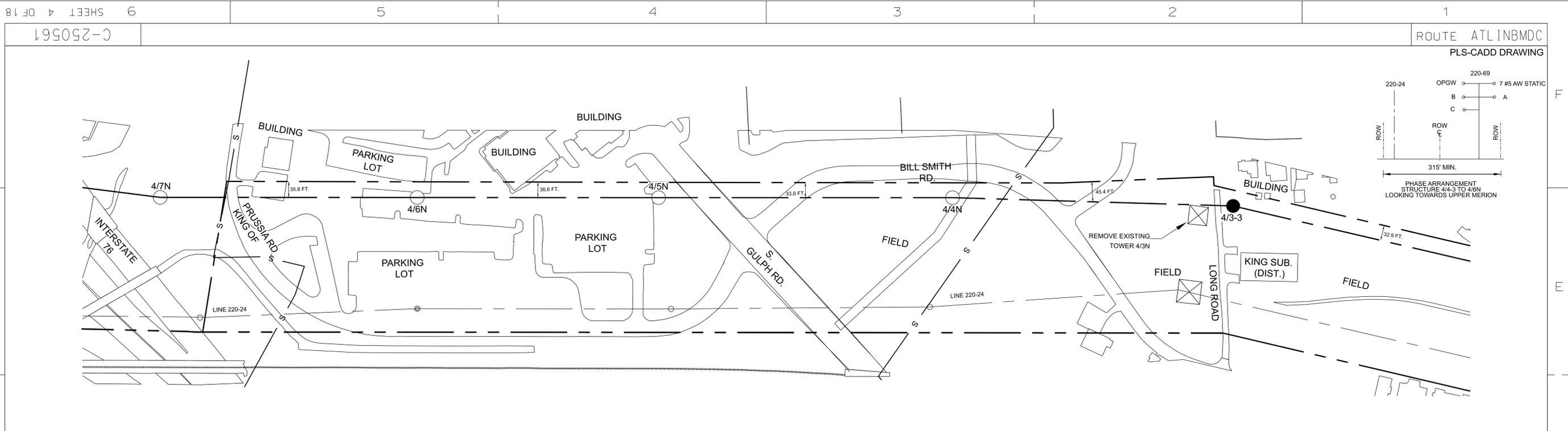
WHEREFORE, PECO respectfully requests the Commission to grant approval to rebuild the existing transmission line and related structures related to the Project from the Plymouth Meeting Substation to the Upper Merion Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania that are at end of life. PECO respectfully requests review and approval of the Letter of Notification by the Commission on or before the January 29, 2026 Public Meeting in order to allow construction to commence in February 2026.

Respectfully submitted,



Kenneth M. Kulak
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Philadelphia, PA 19103-3007
(215) 963-5384
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Dated: October 7, 2025



NOTES:

- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
- ALL WIRES DISPLAYED AT 60° F.
- SEE FIBER CONNECTIVITY MAP C-275486 FOR FULL FIBER CONNECTIONS AT STRUCTURE 4/4N.

PLAN LEGEND

- R.O.W. LINE
- CENTERLINE OTHER CIR.
- CENTERLINE 220-69
- EXISTING TOWER
- EXISTING POLE
- NEW POLE
- +++++ RR TRACKS
- x-x- SUBSTATION FENCELINE
- g-g- GAS PIPELINE
- s-s- SEWER PIPELINE
- w-w- WATER PIPELINE
- e-e- UNDERGROUND ELECTRIC

REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-250561	1	COVER SHEET
C-250561	2	STRUCTURE LIST
C-250561	3-18	PLAN & PROFILE
C-275405	1-2	STRUCTURE STAKING
C-275405	3-5	FOUNDATION SCHEDULE
C-275484	1-3	DAMPER SCHEDULE
C-275484	4-36	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP

TABLE OF ADDITIONS & CHANGES

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
03	03/30/2018	EC* 303558			
14	03/30/2018	WP* 18388473 & 19393608			
25	03/30/2018	ADDED EXISTING TENSIONS ISSUED FOR CONSTRUCTION			
09	03/30/2018	EC* 303558			
18	03/30/2018	WP* 18388473 & 19393608			
25	03/30/2018	ADDED EXISTING TENSIONS ISSUED FOR CONSTRUCTION			
07	03/30/2018	EC* 303558			
26	03/30/2018	WP* 18388473 & 19393608			
24	03/30/2018	ADDED EXISTING TENSIONS ISSUED FOR APPROVAL			
01	03/30/2018	EC* 303558			
27	03/30/2018	WP* 18388473 & 19393608			
25	03/30/2018	ADDED EXISTING TENSIONS ISSUED FOR CONSTRUCTION			

CIVIL 250561

PLAN AND PROFILE CONOWINGO REBUILD PHASE 1 AND 2 UPPER MERION TO PLYMOUTH

220-69 LINE
PECO Energy Company

SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	S&L	S&L	S&L			1/27/25

APPROVED _____ APPROVED _____ APPROVED _____

SHEET 4 OF 18 C-250561-A5

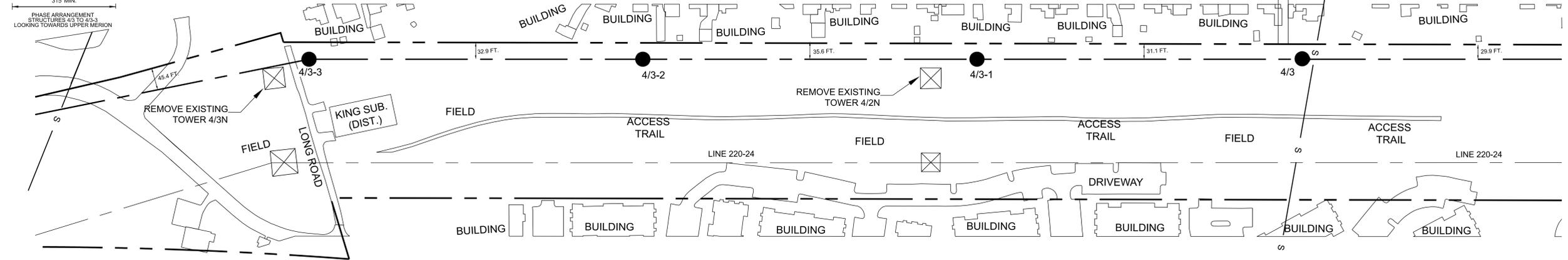
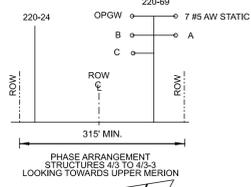
PLT SCALE 1:0 FILE SCALE

ELECTRICAL GRID INFRASTRUCTURE SERVICES

C-250561

ROUTE ATL INBMD

PLS-CADD DRAWING



4/3-3
STATION: 45+03.03
LINE ANGLE: 11.53°
STR. HEIGHT: 120'
TYPE: 230-DE(0-45)
T.O.C. ELEVATION: 190.8'
HT. T.O.C. TO COND.: 70.8'
FRAMING DWG. NO.: 275490 SH. 5
INS. ASS'Y.: S-7350
OPGW ASS'Y.: S-7402
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 3'

4/3-2
STATION: 51+68.51
LINE ANGLE: 0.00°
STR. HEIGHT: 140'
TYPE: 230-TAN(0-2)
T.O.C. ELEVATION: 178.7'
HT. T.O.C. TO COND.: 89.2'
FRAMING DWG. NO.: 275487 SH. 5
INS. ASS'Y.: S-7124
OPGW ASS'Y.: S-7211
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 3'

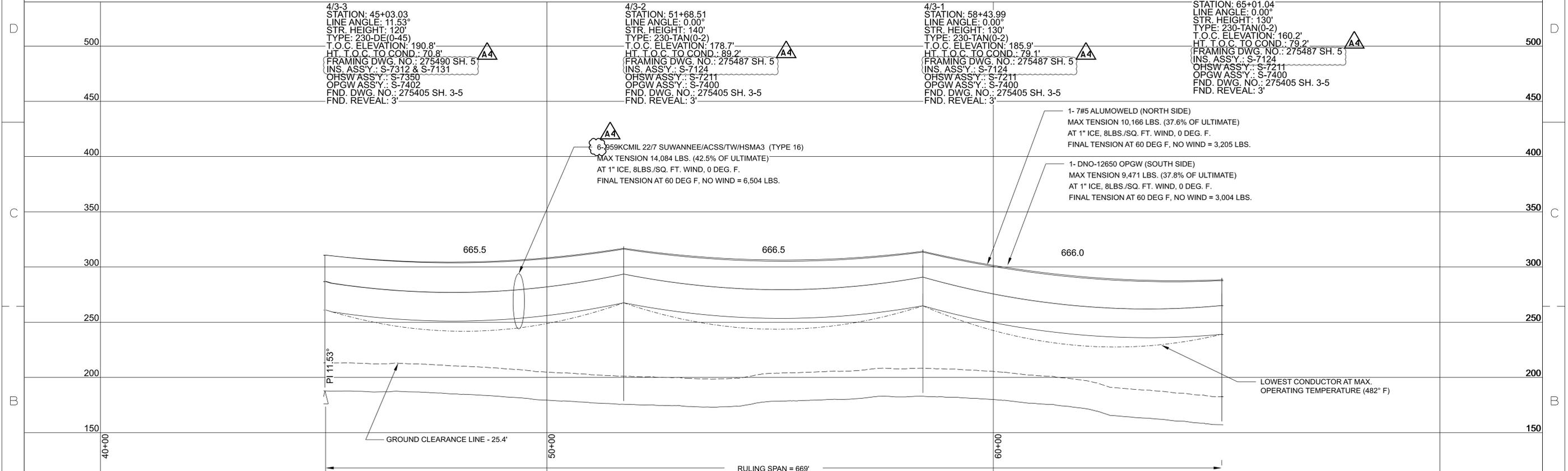
4/3-1
STATION: 58+43.99
LINE ANGLE: 0.00°
STR. HEIGHT: 130'
TYPE: 230-TAN(0-2)
T.O.C. ELEVATION: 185.9'
HT. T.O.C. TO COND.: 79.1'
FRAMING DWG. NO.: 275487 SH. 5
INS. ASS'Y.: S-7124
OPGW ASS'Y.: S-7400
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 3'

4/3
STATION: 65+01.04
LINE ANGLE: 0.00°
STR. HEIGHT: 130'
TYPE: 230-TAN(0-2)
T.O.C. ELEVATION: 160.2'
HT. T.O.C. TO COND.: 79.2'
FRAMING DWG. NO.: 275487 SH. 5
INS. ASS'Y.: S-7124
OPGW ASS'Y.: S-7400
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 3'

6-359KCMIL 22/7 SUWANNEE/ACSS/TW/HMSA3 (TYPE 16)
MAX TENSION 14,084 LBS. (42.5% OF ULTIMATE)
AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.
FINAL TENSION AT 60 DEG F, NO WIND = 6,504 LBS.

1-7#5 ALUMOWELD (NORTH SIDE)
MAX TENSION 10,166 LBS. (37.6% OF ULTIMATE)
AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.
FINAL TENSION AT 60 DEG F, NO WIND = 3,205 LBS.

1-DNO-12650 OPGW (SOUTH SIDE)
MAX TENSION 9,471 LBS. (37.8% OF ULTIMATE)
AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.
FINAL TENSION AT 60 DEG F, NO WIND = 3,004 LBS.

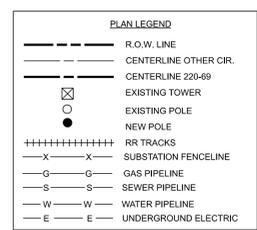


100.0 FT. HORIZ. SCALE
40.0 FT. VERT. SCALE

NOTES:
1. SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
2. ALL WIRES DISPLAYED AT 60° F.

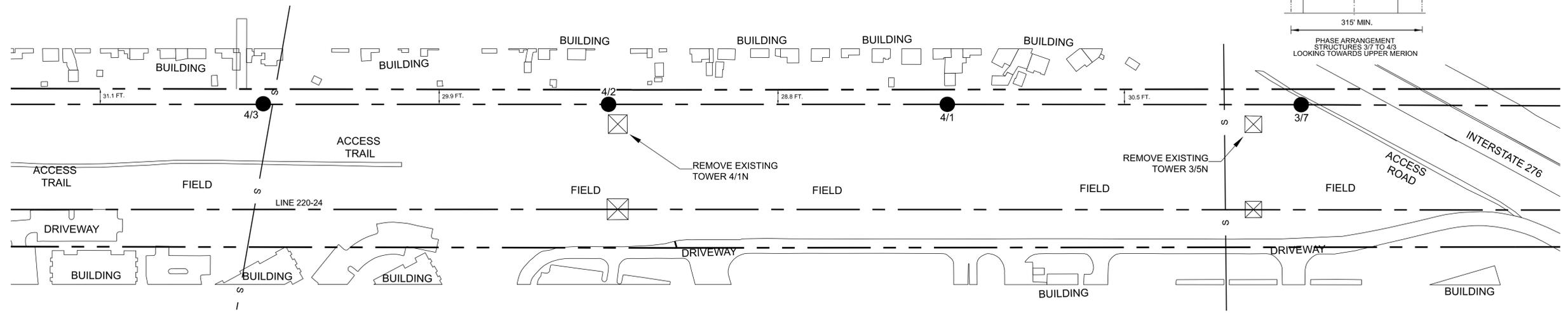
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C-275484	4-36	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP



NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A4	09/18/25	ISSUED FOR CONSTRUCTION	S&L	S&L	S&L
11	07/23/24	ISSUED FOR APPROVAL	S&L	S&L	S&L
26	07/24/24	ISSUED FOR APPROVAL	S&L	S&L	S&L
27	01/27/25	ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

CIVIL		250561	
PLAN AND PROFILE CONOWINGO REBUILD PHASE 1 AND 2 UPPER MERION TO PLYMOUTH			
220-69 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
		01/27/25	
APPROVED	APPROVED		
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 5 OF 18		C-250561-A4	

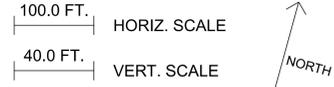
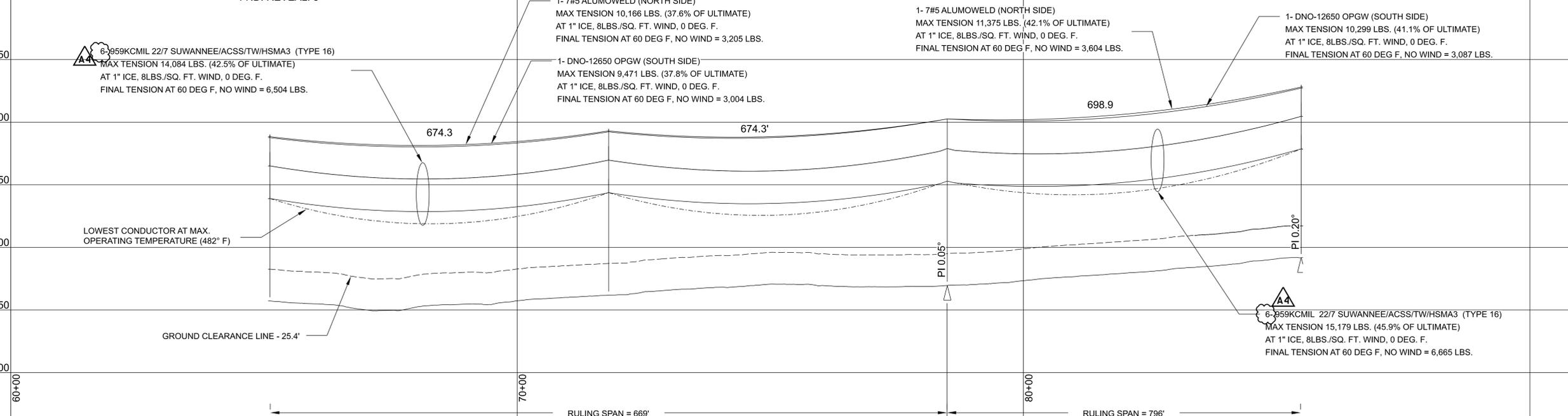


4/3
 STATION: 65+01.04
 LINE ANGLE: 0.00°
 STR. HEIGHT: 130'
 TYPE: 230-TAN(0-2)
 T.O.C. ELEVATION: 160.2'
 HT. T.O.C. TO COND.: 79.2'
 FRAMING DWG. NO.: 275487 SH. 5
 INS. ASS'Y.: S-7124
 OHSW ASS'Y.: S-7211
 OPGW ASS'Y.: S-7400
 FND. DWG. NO.: 275405 SH. 3-5
 FND. REVEAL: 3'

4/2
 STATION: 71+80.59
 LINE ANGLE: 0.00°
 STR. HEIGHT: 130'
 TYPE: 230-TAN(0-2)
 T.O.C. ELEVATION: 164.7'
 HT. T.O.C. TO COND.: 79.2'
 FRAMING DWG. NO.: 275487 SH. 5
 INS. ASS'Y.: S-7124
 OHSW ASS'Y.: S-7211
 OPGW ASS'Y.: S-7400
 FND. DWG. NO.: 275405 SH. 3-5
 FND. REVEAL: 3'

4/1
 STATION: 78+49.59
 LINE ANGLE: 0.05°
 STR. HEIGHT: 130'
 TYPE: 230-DE(0-45)
 T.O.C. ELEVATION: 172.6'
 HT. T.O.C. TO COND.: 80.8'
 FRAMING DWG. NO.: 275490 SH. 5
 INS. ASS'Y.: S-7350
 OHSW ASS'Y.: S-7131
 OPGW ASS'Y.: S-7402
 FND. DWG. NO.: 275405 SH. 3-5
 FND. REVEAL: 3'

3/7
 STATION: 85+48.49
 LINE ANGLE: 0.20°
 STR. HEIGHT: 135'
 TYPE: 230-TAN(0-2)
 T.O.C. ELEVATION: 194.8'
 HT. T.O.C. TO COND.: 84.2'
 FRAMING DWG. NO.: 275487 SH. 5
 INS. ASS'Y.: S-7124
 OHSW ASS'Y.: S-7211
 OPGW ASS'Y.: S-7400
 FND. DWG. NO.: 275405 SH. 3-5
 FND. REVEAL: 3'



- NOTES:**
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
 - ALL WIRES DISPLAYED AT 60° F.

PLAN LEGEND

- R.O.W. LINE
- - - CENTERLINE OTHER CIR.
- - - CENTERLINE 220-69
- ⊗ EXISTING TOWER
- EXISTING POLE
- NEW POLE
- +++++ RR TRACKS
- x-x- SUBSTATION FENCELINE
- g-g- GAS PIPELINE
- s-s- SEWER PIPELINE
- w-w- WATER PIPELINE
- e-e- UNDERGROUND ELECTRIC



REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-250561	1	COVER SHEET
C-250561	2	STRUCTURE LIST
C-250561	3-18	PLAN & PROFILE
C-275405	1-2	STRUCTURE STAKING
C-275405	3-5	FOUNDATION SCHEDULE
C-275484	1-3	DAMPERS SCHEDULE
C-275484	4-36	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP

TABLE OF ADDITIONS & CHANGES

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A1	11/01/24	EC* 303558 WP* 18368473 & 19393608 SARGENT & LUNDY ISSUED FOR APPROVAL	S&L	S&L	S&L
A2	07/26/24	EC* 303558 WP* 18368473 & 19393608 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A3	01/27/25	EC* 303558 WP* 18368473 & 19393608 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

CIVIL		250561	
PLAN AND PROFILE CONOWINGO REBUILD PHASE 1 AND 2 UPPER MERION TO PLYMOUTH			
220-69 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
		01/27/25	
APPROVED	APPROVED		
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 6 OF 18		C-250561-A4	

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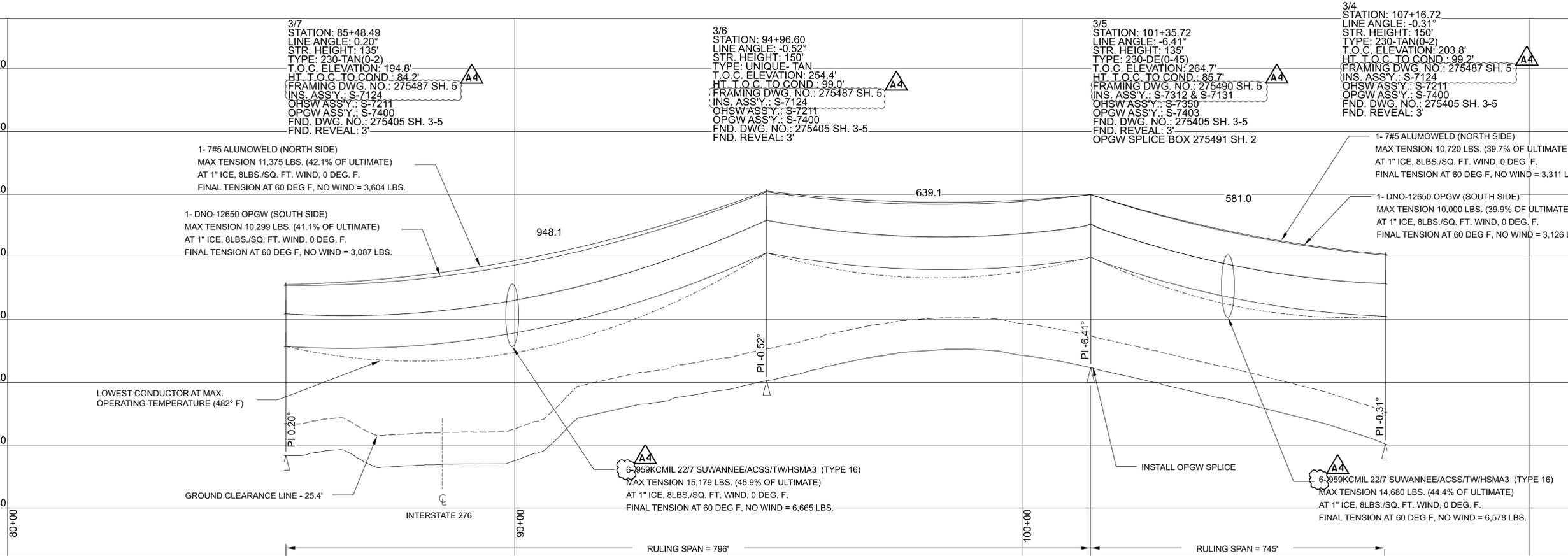
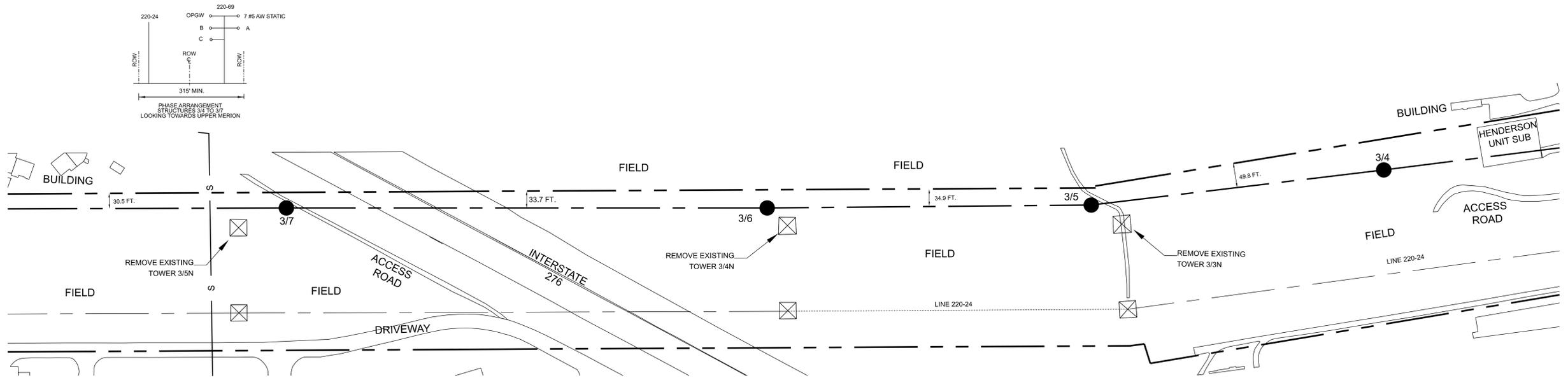
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- NOTES:
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
 - ALL WIRES DISPLAYED AT 60° F.

PLAN LEGEND

---	R.O.W. LINE
---	CENTERLINE OTHER CIR.
---	CENTERLINE 220-69
⊗	EXISTING TOWER
○	EXISTING POLE
●	NEW POLE
+++++	RR TRACKS
-x-x-	SUBSTATION FENCELINE
-G-G-	GAS PIPELINE
-S-S-	SEWER PIPELINE
-W-W-	WATER PIPELINE
-E-E-	UNDERGROUND ELECTRIC



REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-250561	1	COVER SHEET
C-250561	2	STRUCTURE LIST
C-250561	3-18	PLAN & PROFILE
C-275405	1-2	STRUCTURE STAKING
C-275405	3-5	FOUNDATION SCHEDULE
C-275484	1-3	DAMPER SCHEDULE
C-275484	4-36	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP

TABLE OF ADDITIONS & CHANGES

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A1	11/01	EC* 303558, W* 18360473 & 19393608 SARGENT & LUNDY	S&L	S&L	S&L
A2	07/26	EC* 303558, W* 18360473 & 19393608 SARGENT & LUNDY	S&L	S&L	S&L
A3	01/27	EC* 303558, W* 18360473 & 19393608 SARGENT & LUNDY	S&L	S&L	S&L

CIVIL		250561	
PLAN AND PROFILE			
CONOWINGO REBUILD PHASE 1 AND 2			
UPPER MERION TO PLYMOUTH			
220-69 LINE			
PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
		01/27/25	
APPROVED	APPROVED		
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 7 OF 18		C-250561-A4	

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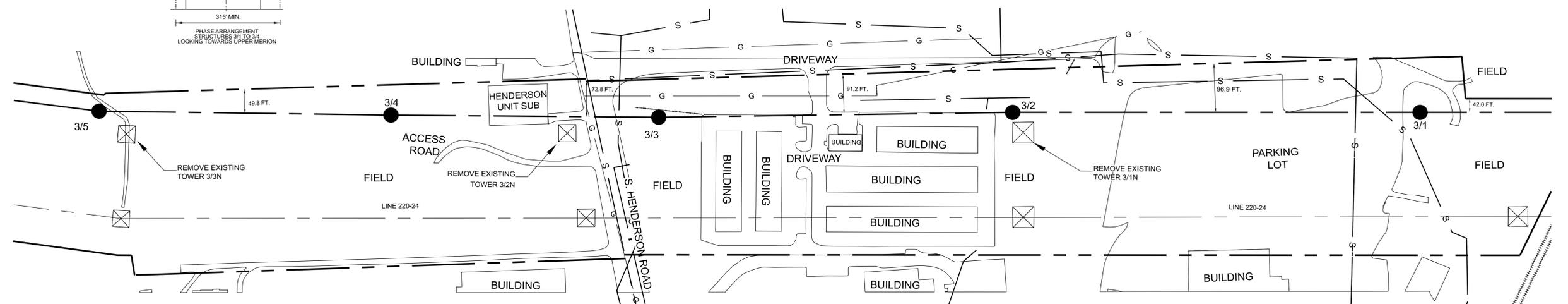
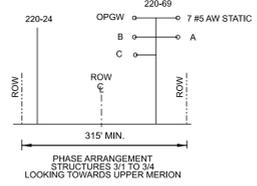
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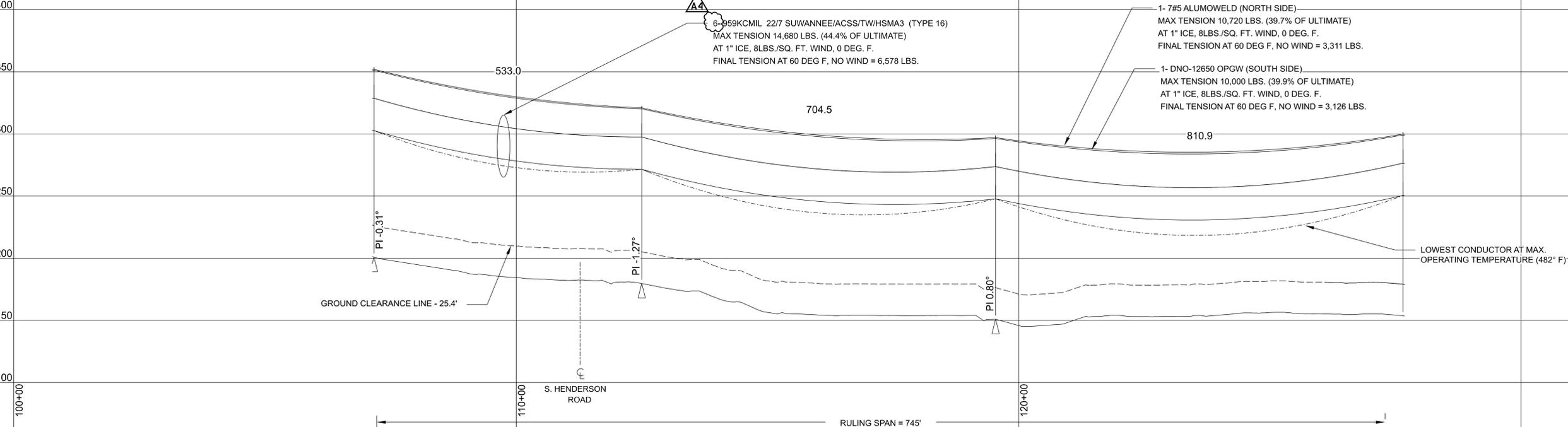


3/4
STATION: 107+16.72
LINE ANGLE: -0.31°
STR. HEIGHT: 150'
TYPE: 230-TAN(0-2)
T.O.C. ELEVATION: 203.8'
HT. T.O.C. TO COND.: 99.2'
FRAMING DWG. NO.: 275487 SH. 5
INS. ASSY.: S-7124
OPGW ASSY.: S-7211
OPGW ASSY.: S-7400
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 3'

3/3
STATION: 112+49.67
LINE ANGLE: -1.27°
STR. HEIGHT: 140'
TYPE: 230-TAN(0-2)
T.O.C. ELEVATION: 182.7'
HT. T.O.C. TO COND.: 89.2'
FRAMING DWG. NO.: 275487 SH. 5
INS. ASSY.: S-7124
OPGW ASSY.: S-7211
OPGW ASSY.: S-7400
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 3'

3/2
STATION: 119+54.14
LINE ANGLE: 0.80°
STR. HEIGHT: 145'
TYPE: 230-TAN(0-2)
T.O.C. ELEVATION: 153.8'
HT. T.O.C. TO COND.: 94.2'
FRAMING DWG. NO.: 275487 SH. 5
INS. ASSY.: S-7124
OPGW ASSY.: S-7211
OPGW ASSY.: S-7400
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 3'

3/1
STATION: 127+65.02
LINE ANGLE: 0.00°
STR. HEIGHT: 145'
TYPE: 230-TAN(0-2)
T.O.C. ELEVATION: 156.6'
HT. T.O.C. TO COND.: 94.2'
FRAMING DWG. NO.: 275487 SH. 5
INS. ASSY.: S-7124
OPGW ASSY.: S-7211
OPGW ASSY.: S-7400
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 3'



100.0 FT. HORIZ. SCALE
40.0 FT. VERT. SCALE



- NOTES:
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
 - ALL WIRES DISPLAYED AT 60° F.

REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-250561	1	COVER SHEET
C-250561	2	STRUCTURE LIST
C-250561	3-18	PLAN & PROFILE
C-275405	1-2	FOUNDATION SCHEDULE
C-275405	3-5	DAMPER SCHEDULE
C-275484	1-3	STRINGING CHARTS
C-275484	4-36	FIBER CONNECTION MAP
C-275486	1-7	

PLAN LEGEND

---	R.O.W. LINE
- - -	CENTERLINE OTHER CIR.
- - -	CENTERLINE 220-69
⊗	EXISTING TOWER
○	EXISTING POLE
●	NEW POLE
+++++	RR TRACKS
-x-x-	SUBSTATION FENCELINE
-g-g-	GAS PIPELINE
-s-s-	SEWER PIPELINE
-w-w-	WATER PIPELINE
-e-e-	UNDERGROUND ELECTRIC



A4	09	EC* 303558	WB* 18368473 & 19393608	S&L	S&L	S&L	USE ONLY PRINTS SHOWING LATEST DATE
	18	SARGENT & LUNDY	UPDATED: BUNDLE SIZE				
	25		ISSUED FOR CONSTRUCTION				

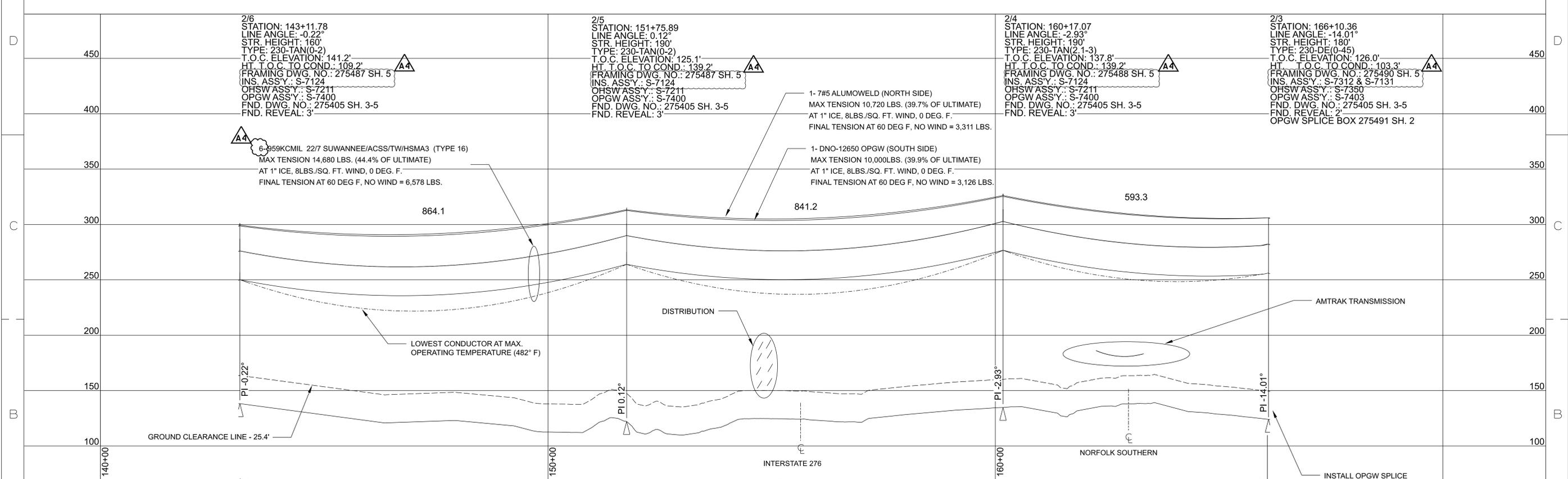
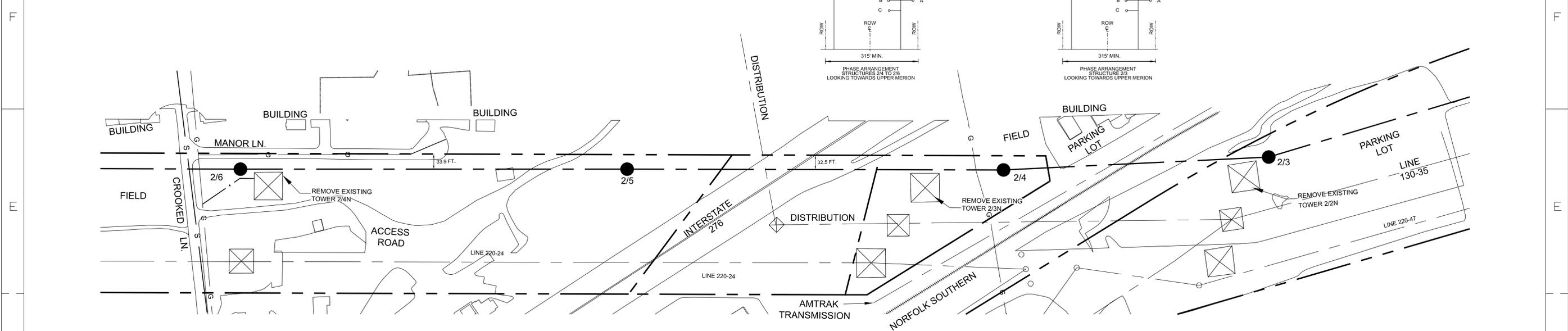
TABLE OF ADDITIONS & CHANGES

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A1	11	EC* 303558	S&L	S&L	S&L
	01	WB* 18368473 & 19393608			
	23	SARGENT & LUNDY			
		ADDED THIS DRAWING			
		ISSUED FOR APPROVAL			
A2	07	EC* 303558	S&L	S&L	S&L
	26	WB* 18368473 & 19393608			
	24	SARGENT & LUNDY			
		UPDATED THIS DRAWING			
		ISSUED FOR APPROVAL			
A3	01	EC* 303558	S&L	S&L	S&L
	27	WB* 18368473 & 19393608			
	25	SARGENT & LUNDY			
		UPDATED THIS DRAWING			
		ISSUED FOR CONSTRUCTION			

CIVIL		250561	
PLAN AND PROFILE			
CONOWINGO REBUILD PHASE 1 AND 2			
UPPER MERION TO PLYMOUTH			
220-69 LINE			
PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
		01/27/25	
APPROVED		APPROVED	
APPROVED		APPROVED	
APPROVED		APPROVED	
SHEET 8 OF 18		C-250561-A4	

C-250561

ROUTE ATLINBMDC
PLS-CADD DRAWING



100.0 FT. HORIZ. SCALE
40.0 FT. VERT. SCALE

NOTES:
1. SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
2. ALL WIRES DISPLAYED AT 60° F.

PLAN LEGEND

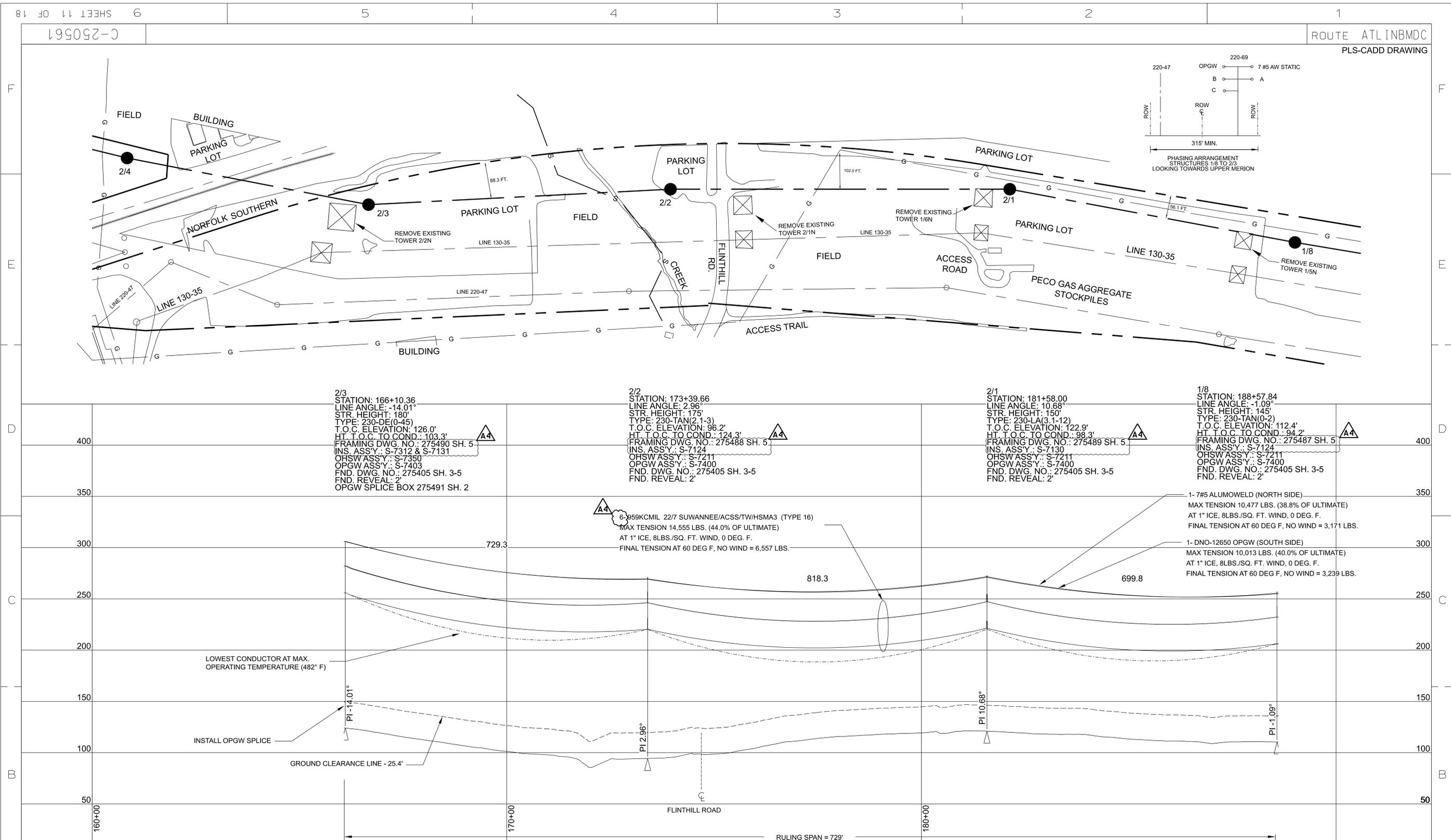
---	R.O.W. LINE
- - -	CENTERLINE OTHER CIR.
- - -	CENTERLINE 220-69
⊗	EXISTING TOWER
○	EXISTING POLE
●	NEW POLE
+++++	RR TRACKS
-x-x-	SUBSTATION FENCELINE
-g-g-	GAS PIPELINE
-s-s-	SEWER PIPELINE
-w-w-	WATER PIPELINE
-e-e-	UNDERGROUND ELECTRIC



TABLE OF ADDITIONS & CHANGES
USE ONLY PRINTS SHOWING LATEST DATE

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A4	09/18/25	EC* 303558, W* 18360473 & 19393608, SARGENT & LUNDY, UPDATED: BUNDLE SIZE ISSUED FOR CONSTRUCTION	S&L	S&L	S&L
A1	11/01/23	EC* 303558, W* 18360473 & 19393608, SARGENT & LUNDY, ADDED: THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A2	07/24/24	EC* 303558, W* 18360473 & 19393608, SARGENT & LUNDY, UPDATED: THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A3	01/25/25	EC* 303558, W* 18360473 & 19393608, SARGENT & LUNDY, UPDATED: THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

CIVIL	250561					
PLAN AND PROFILE CONOWINGO REBUILD PHASE 1 AND 2 UPPER MERION TO PLYMOUTH						
220-69 LINE PECO Energy Company						
SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	S&L	S&L	S&L	S&L		01/27/25
APPROVED		APPROVED		APPROVED		
APPROVED		APPROVED		APPROVED		
SHEET 10 OF 18		C-250561-A4				



100.0 FT. HORIZ. SCALE
40.0 FT. VERT. SCALE

REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-250561	1	COVER SHEET
C-250561	2	STRUCTURE LIST
C-250561	3-18	PLAN & PROFILE
C-275405	1-2	STRUCTURE STAKING
C-275405	3-5	FOUNDATION SCHEDULE
C-275484	1-3	DAMPER SCHEDULE
C-275484	4-36	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP

- NOTES:
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
 - ALL WIRES DISPLAYED AT 60° F.

PLAN LEGEND

---	R.O.W. LINE
- - -	CENTERLINE OTHER CIR.
- - -	CENTERLINE 220-69
⊗	EXISTING TOWER
○	NEW POLE
+	RR TRACKS
-x-x-	SUBSTATION FENCELINE
-g-g-	GAS PIPELINE
-s-s-	SEWER PIPELINE
-w-w-	WATER PIPELINE
-e-e-	UNDERGROUND ELECTRIC



TABLE OF ADDITIONS & CHANGES

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
09	04/18/25	EC* 303558 WP* 18308473 & 19393608 SARGENT & LUNDY UPDATED: BUNDLE SIZE ISSUED FOR CONSTRUCTION	S&L	S&L	S&L
11	07/01/25	EC* 303558 WP* 18308473 & 19393608 SARGENT & LUNDY ADDED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
23	07/24/25	EC* 303558 WP* 18308473 & 19393608 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
27	08/01/25	EC* 303558 WP* 18308473 & 19393608 SARGENT & LUNDY UPDATED THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

CIVIL 250561

PLAN AND PROFILE
CONOWINGO REBUILD PHASE 1 AND 2
UPPER MERION TO PLYMOUTH

220-69 LINE
PECO Energy Company

SCALE	DESIGN	CADD	CHECKED	INSPECTED	APPROVED	DATE
NONE	S&L	S&L	S&L			01/27/25

APPROVED: _____ APPROVED: _____

APPROVED: _____ APPROVED: _____

SHEET 11 OF 18 C-250561-A4

PLOT SCALE 1:0
FILE SCALE

C-250561

ROUTE ATLINBMD
PLS-CADD DRAWING

F

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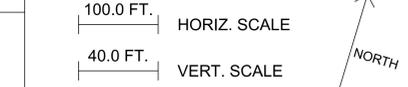
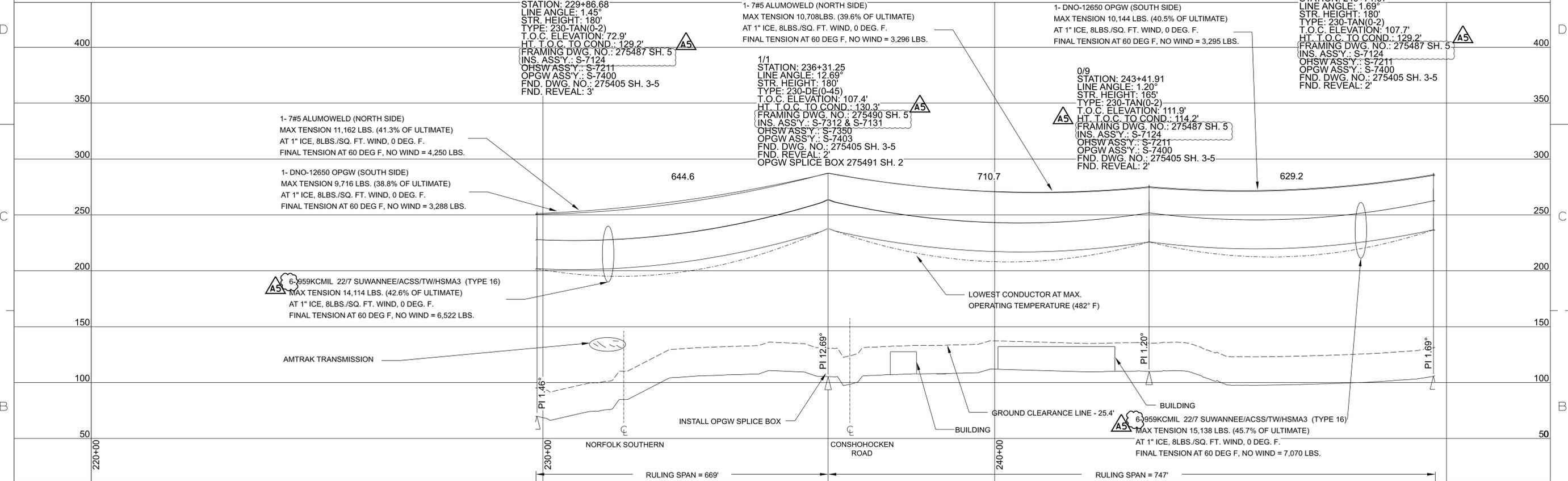
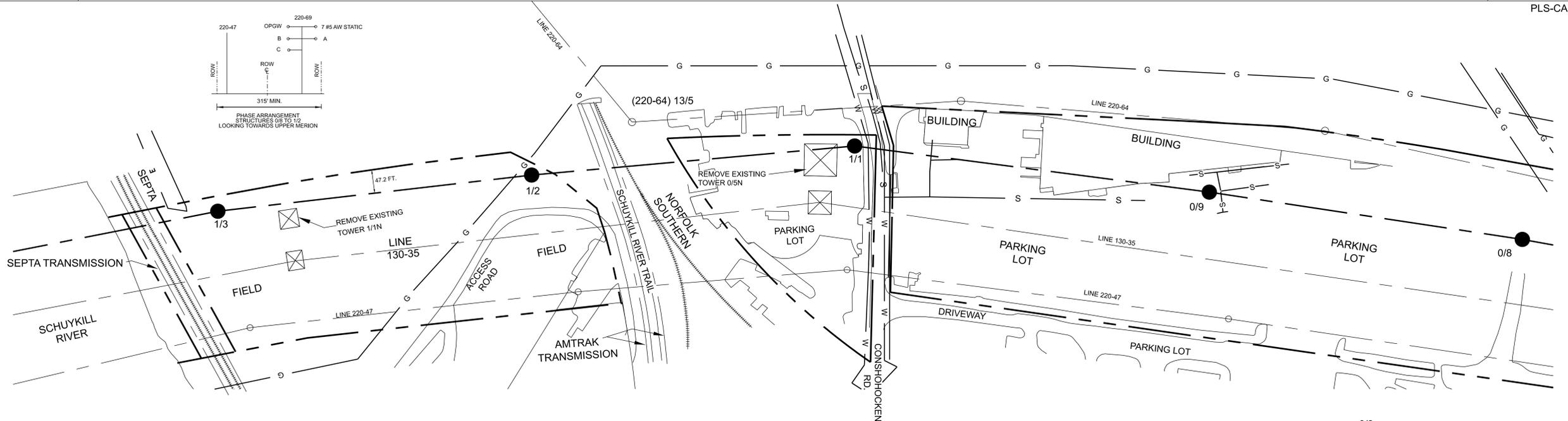
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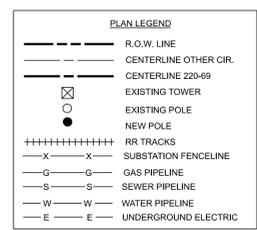
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REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-250561	1	COVER SHEET
C-250561	2	STRUCTURE LIST
C-250561	3-18	PLAN & PROFILE
C-275405	1-2	STRUCTURE STAKING
C-275405	3-5	FOUNDATION SCHEDULE
C-275484	1-3	DAMPER SCHEDULE
C-275484	4-36	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP

- NOTES:
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
 - ALL WIRES DISPLAYED AT 60° F.



NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
04	03/14/25	EC* 303558 WP* 18360473 & 19393608 SARGENT & LUNDY LOCATIONS & ASSOCIATED TENSIONS ISSUED FOR CONSTRUCTION	S&L	S&L	S&L
05	09/10/25	EC* 303558 WP* 18360473 & 19393608 SARGENT & LUNDY UPDATED: BUNDLE SIZE ISSUED FOR CONSTRUCTION	S&L	S&L	S&L
A1	11/01/25	EC* 303558 WP* 18360473 & 19393608 SARGENT & LUNDY ADDED THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A2	07/26/26	EC* 303558 WP* 18360473 & 19393608 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A3	01/27/25	EC* 303558 WP* 18360473 & 19393608 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

CIVIL		250561	
PLAN AND PROFILE CONOWINGO REBUILD PHASE 1 AND 2 UPPER MERION TO PLYMOUTH			
220-69 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NDNE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
		01/27/25	
APPROVED	APPROVED		
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 14 OF 18		C-250561-A5	

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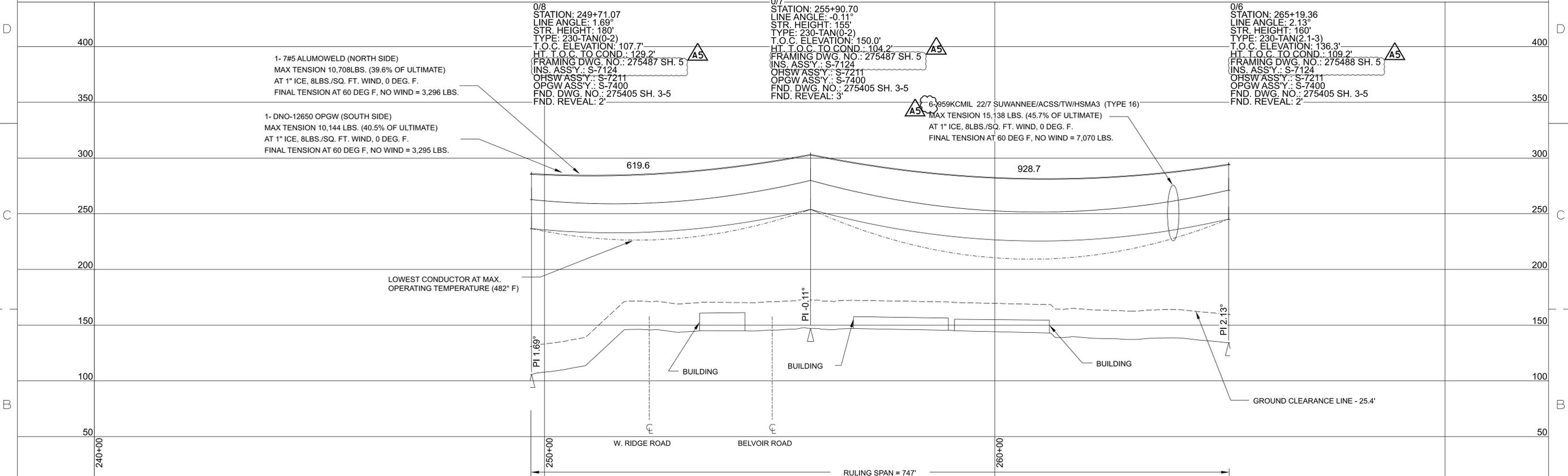
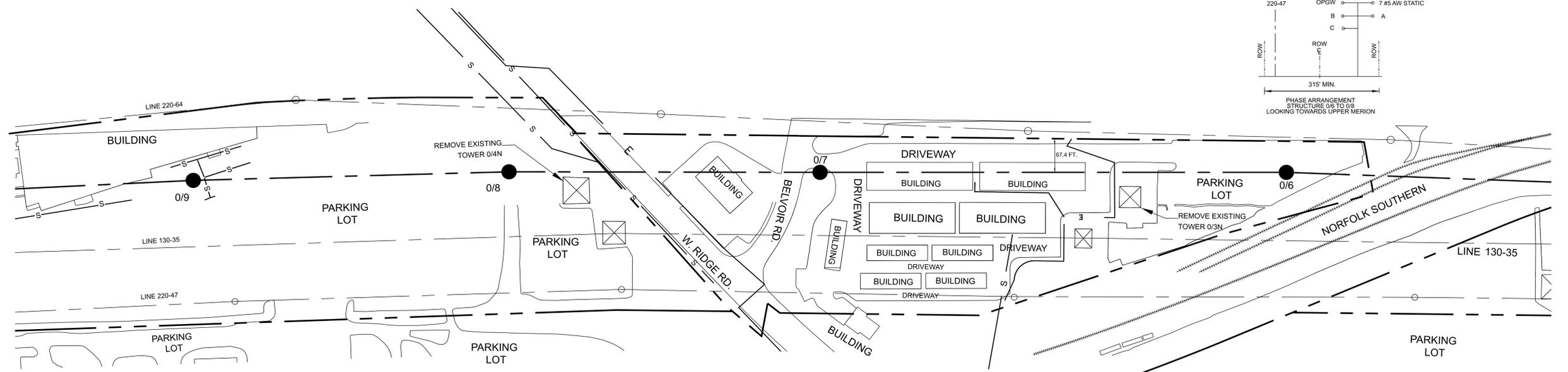
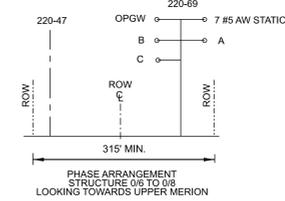
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199052-0

ROUTE ATLINBMD

PLS-CADD DRAWING



1-7#5 ALUMOWELD (NORTH SIDE)
MAX TENSION 10,708LBS. (39.6% OF ULTIMATE)
AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.
FINAL TENSION AT 60 DEG F, NO WIND = 3,296 LBS.

1-DNO-12650 OPGW (SOUTH SIDE)
MAX TENSION 10,144 LBS. (40.5% OF ULTIMATE)
AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.
FINAL TENSION AT 60 DEG F, NO WIND = 3,295 LBS.

0/8
STATION: 249+71.07
LINE ANGLE: 1.69°
STR. HEIGHT: 180'
TYPE: 230-TAN(0-2)
T.O.C. ELEVATION: 107.7'
HT. T.O.C. TO COND.: 129.2'
FRAMING DWG. NO.: 275487 SH. 5
INS. ASS'Y.: S-7124
OHSW ASS'Y.: S-7211
OPGW ASS'Y.: S-7400
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 2'

0/7
STATION: 255+90.70
LINE ANGLE: -0.11°
STR. HEIGHT: 165'
TYPE: 230-TAN(0-2)
T.O.C. ELEVATION: 150.0'
HT. T.O.C. TO COND.: 104.2'
FRAMING DWG. NO.: 275487 SH. 5
INS. ASS'Y.: S-7124
OHSW ASS'Y.: S-7211
OPGW ASS'Y.: S-7400
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 3'

0/6
STATION: 265+19.36
LINE ANGLE: 2.13°
STR. HEIGHT: 160'
TYPE: 230-TAN(2.1-3)
T.O.C. ELEVATION: 136.3'
HT. T.O.C. TO COND.: 109.2'
FRAMING DWG. NO.: 275488 SH. 5
INS. ASS'Y.: S-7124
OHSW ASS'Y.: S-7211
OPGW ASS'Y.: S-7400
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 2'

6-959KCMIL 22/7 SUWANNEE/ACSS/TW/HMSA3 (TYPE 16)
MAX TENSION 15,138 LBS. (45.7% OF ULTIMATE)
AT 1" ICE, 8LBS./SQ. FT. WIND, 0 DEG. F.
FINAL TENSION AT 60 DEG F, NO WIND = 7,070 LBS.

100.0 FT. HORIZ. SCALE
40.0 FT. VERT. SCALE

NOTES:
1. SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
2. ALL WIRES DISPLAYED AT 60° F.

REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-250561	1	COVER SHEET
C-250561	2	STRUCTURE LIST
C-250561	3-18	PLAN & PROFILE
C-275405	1-2	STRUCTURE STAKING
C-275405	3-5	FOUNDATION SCHEDULE
C-275484	1-3	DAMPER SCHEDULE
C-275484	4-36	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP

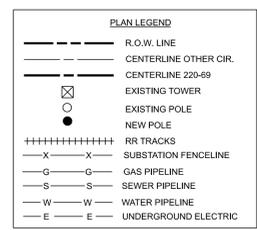
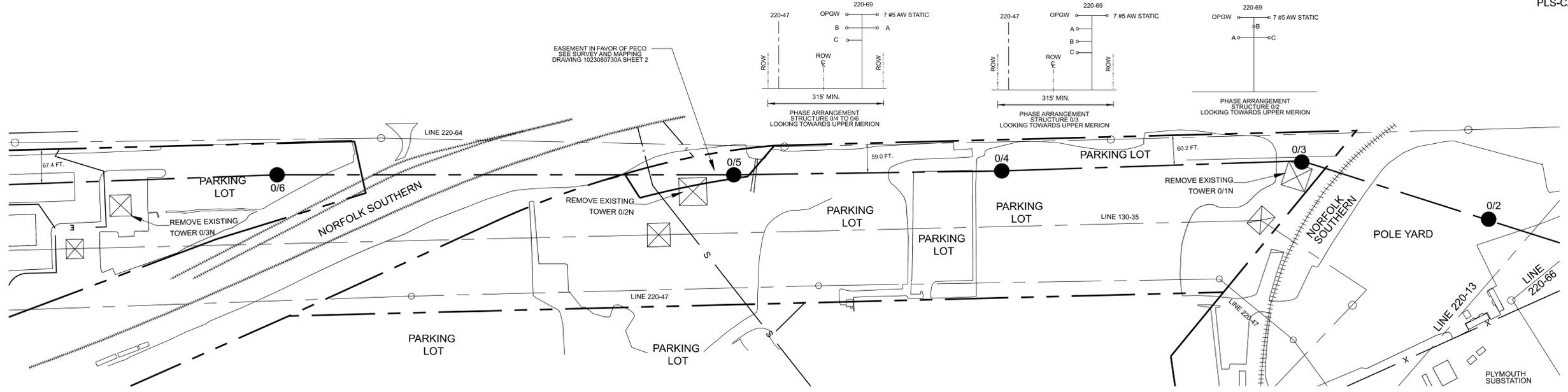


TABLE OF ADDITIONS & CHANGES
USE ONLY PRINTS SHOWING LATEST DATE

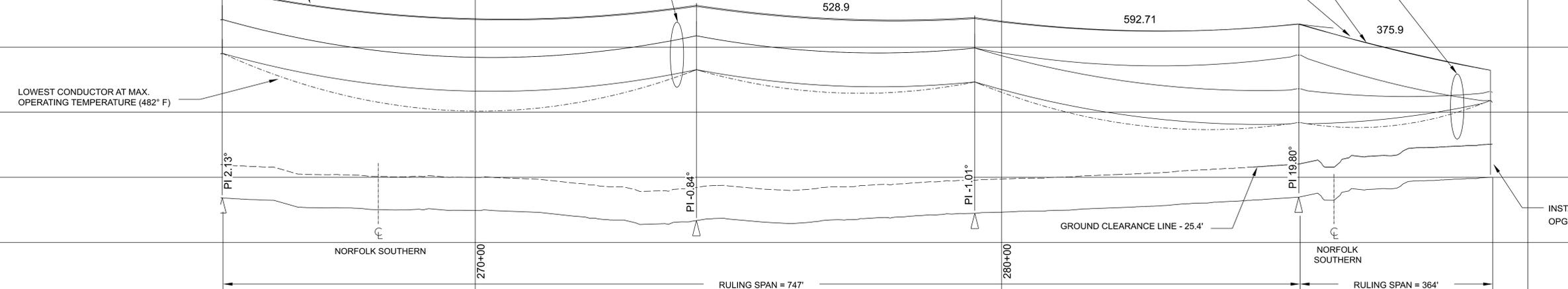
NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
04	03/14/25	EC* 303558 WP* 18360473 & 19393688 SARGENT & LUNDY LOCATIONS & ASSOCIATED TENSIONS ISSUED FOR CONSTRUCTION	S&L	S&L	S&L
05	03/14/25	EC* 303558 WP* 18360473 & 19393688 SARGENT & LUNDY UPDATED: BUNDLE SIZE ISSUED FOR CONSTRUCTION	S&L	S&L	S&L
06	07/26/24	EC* 303558 WP* 18360473 & 19393688 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
07	01/27/25	EC* 303558 WP* 18360473 & 19393688 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L

CIVIL		250561	
PLAN AND PROFILE CONOWINGO REBUILD PHASE 1 AND 2 UPPER MERION TO PLYMOUTH			
220-69 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
		01/27/25	
APPROVED	APPROVED		
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 15 OF 18		C-250561-A5	



<p>0/6 STATION: 265+19.36 LINE ANGLE: 2.13° STR. HEIGHT: 160' TYPE: 230-TAN(2.1-3) T.O.C. ELEVATION: 136.3' HT. T.O.C. TO COND.: 109.2' FRAMING DWG. NO.: 275488 SH. 5 INS. ASS'Y.: S-7124 OHSW ASS'Y.: S-7211 OPGW ASS'Y.: S-7400 FND. DWG. NO.: 275405 SH. 3-5 FND. REVEAL: 2'</p>	<p>0/5 STATION: 274+20.32 LINE ANGLE: -0.84° STR. HEIGHT: 150' TYPE: 230-TAN(0-2) T.O.C. ELEVATION: 118.8' HT. T.O.C. TO COND.: 114.2' FRAMING DWG. NO.: 275487 SH. 5 INS. ASS'Y.: S-7124 OHSW ASS'Y.: S-7211 OPGW ASS'Y.: S-7400 FND. DWG. NO.: 275405 SH. 3-5 FND. REVEAL: 2'</p>	<p>0/4 STATION: 279+49.17 LINE ANGLE: -1.01° STR. HEIGHT: 150' TYPE: 230-TAN(0-2) T.O.C. ELEVATION: 124.4' HT. T.O.C. TO COND.: 99.2' FRAMING DWG. NO.: 275487 SH. 5 INS. ASS'Y.: S-7124 OHSW ASS'Y.: S-7211 OPGW ASS'Y.: S-7400 FND. DWG. NO.: 275405 SH. 3-5 FND. REVEAL: 2'</p>	<p>0/3 STATION: 285+41.88 LINE ANGLE: 19.80° STR. HEIGHT: 130' TYPE: UNIQUE-DE T.O.C. ELEVATION: 137.2' HT. T.O.C. TO COND.: 54.3' FRAMING DWG. NO.: 250562 SH. 8 INS. ASS'Y.: S-7312 & S-7131 OHSW ASS'Y.: S-7350 OPGW ASS'Y.: S-7402 FND. DWG. NO.: 275405 SH. 3-5 FND. REVEAL: 3'</p>
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<p>1- 7#5 ALUMOWELD (NORTH SIDE) MAX TENSION 10,708 LBS. (39.6% OF ULTIMATE) AT 1" ICE, 8 LBS./SQ. FT. WIND, 0 DEG. F. FINAL TENSION AT 60 DEG F, NO WIND = 3,296 LBS.</p>	<p>6- 959KCMIL 22/7 SUWANNEE/ACSS/TW/HMSA3 (TYPE 16) MAX TENSION 15,138 LBS. (45.7% OF ULTIMATE) AT 1" ICE, 8 LBS./SQ. FT. WIND, 0 DEG. F. FINAL TENSION AT 60 DEG F, NO WIND = 7,070 LBS.</p>	<p>1- 7#5 ALUMOWELD (NORTH SIDE) MAX TENSION 9,885 LBS. (36.6% OF ULTIMATE) AT 1" ICE, 8 LBS./SQ. FT. WIND, 0 DEG. F. FINAL TENSION AT 60 DEG F, NO WIND = 5,040 LBS.</p>	<p>1- DNO-12650 OPGW (SOUTH SIDE) MAX TENSION 8,020 LBS. (32.0% OF ULTIMATE) AT 1" ICE, 8 LBS./SQ. FT. WIND, 0 DEG. F. FINAL TENSION AT 60 DEG F, NO WIND = 3,450 LBS.</p>	<p>0/2 STATION: 289+17.78 LINE ANGLE: 0.00° STR. HEIGHT: 80' TYPE: UNIQUE-HORZ DE T.O.C. ELEVATION: 151.7' HT. T.O.C. TO COND.: 56.3' FRAMING DWG. NO.: 275406 SH. 5 INS. ASS'Y.: S-7312 & S-7131 OHSW ASS'Y.: S-7350 OPGW ASS'Y.: S-7403 FND. DWG. NO.: 275405 SH. 2-3 FND. REVEAL: 2' OPGW SPLICE BOX 275491 SH. 2</p>
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- NOTES:
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
 - ALL WIRES DISPLAYED AT 60° F.

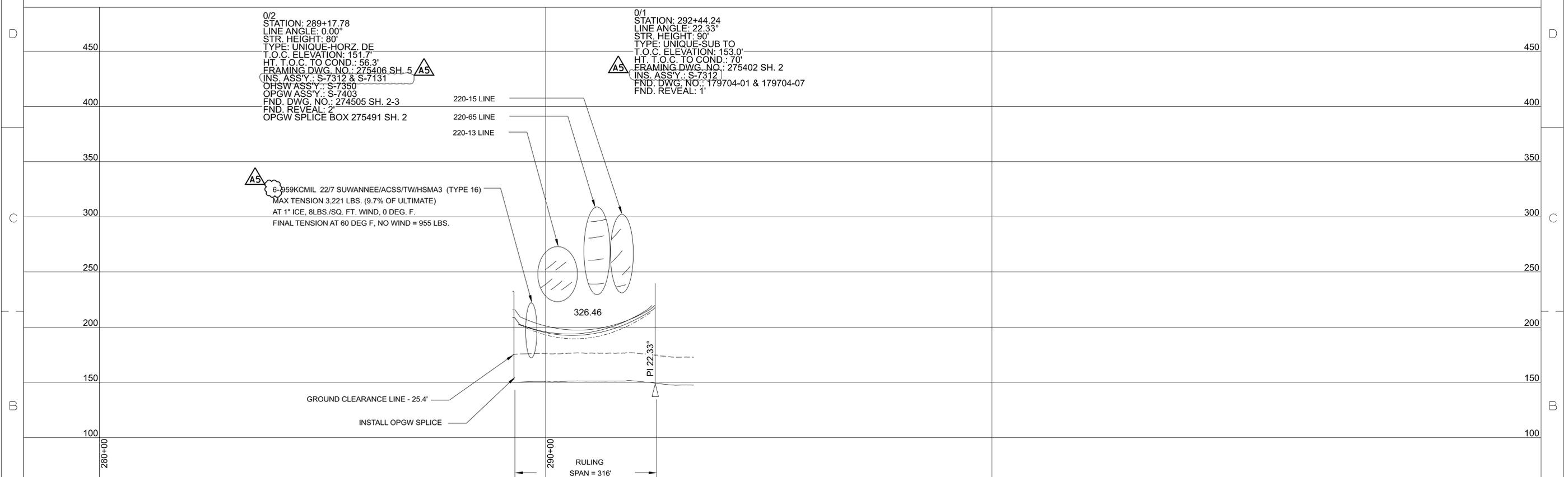
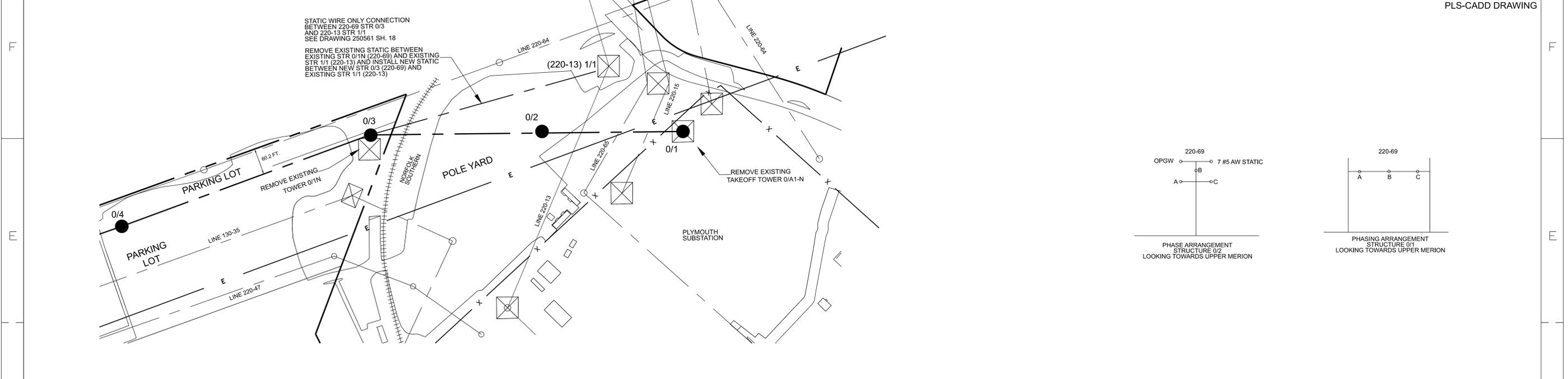
PLAN LEGEND

---	R.O.W. LINE
---	CENTERLINE OTHER CIR.
---	CENTERLINE 220-69
⊗	EXISTING TOWER
○	EXISTING POLE
●	NEW POLE
+++++	RR TRACKS
-x-x-	SUBSTATION FENCELINE
-g-g-	GAS PIPELINE
-s-s-	SEWER PIPELINE
-w-w-	WATER PIPELINE
-e-e-	UNDERGROUND ELECTRIC



TABLE OF ADDITIONS & CHANGES		USE ONLY PRINTS SHOWING LATEST DATE	
NO.	DATE	DESCRIPTION	REV'D
04	03/14/25	EC* 303558 WP# 18368473 & 19393608 SARGENT & LUNDY UPDATED: STR 0/2 AND 0/3 LOADINGS & ASSOCIATED TENSIONS ISSUED FOR CONSTRUCTION	S&L S&L S&L
05	09/18/25	EC* 303558 WP# 18368473 & 19393608 SARGENT & LUNDY ADDED: THIS DRAWING ISSUED FOR APPROVAL	S&L S&L S&L
	07/24/24	EC* 303558 WP# 18368473 & 19393608 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR APPROVAL	S&L S&L S&L
	01/27/25	EC* 303558 WP# 18368473 & 19393608 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR CONSTRUCTION	S&L S&L S&L

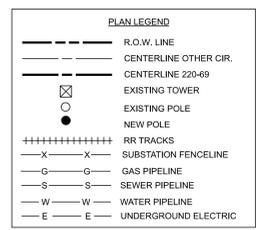
CIVIL		250561	
PLAN AND PROFILE CONOWINGO REBUILD PHASE 1 AND 2 UPPER MERION TO PLYMOUTH			
220-69 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
APPROVED	APPROVED	APPROVED	APPROVED
APPROVED	APPROVED	APPROVED	APPROVED
SHEET 16 OF 18		C-250561-A5	



- NOTES:
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
 - ALL WIRES DISPLAYED AT 60° F.

REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-250561	1	COVER SHEET
C-250561	2	STRUCTURE LIST
C-250561	3-18	PLAN & PROFILE
C-275405	1-2	STRUCTURE STAKING
C-275405	3-5	FOUNDATION SCHEDULE
C-275484	1-3	DAMPER SCHEDULE
C-275484	4-36	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP



NO.	DATE	DESCRIPTION	TABLE OF ADDITIONS & CHANGES			
			REV'D	CHK'D	APP'D	DATE
A4	03/14/25	EC* 303558 WP* 18368473 & 19393608 SARGENT & LUNDY LOCATIONS & ASSOCIATED TENSIONS ISSUED FOR CONSTRUCTION	S&L	S&L	S&L	USE ONLY PRINTS SHOWING LATEST DATE
A5	09/18/25	EC* 303558 WP* 18368473 & 19393608 SARGENT & LUNDY UPDATED: BUNDLE SIZE ISSUED FOR CONSTRUCTION	S&L	S&L	S&L	
	07/26/24	EC* 303558 WP* 18368473 & 19393608 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L	
	03/27/25	EC* 303558 WP* 18368473 & 19393608 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L	

CIVIL		250561	
PLAN AND PROFILE CONOWINGO REBUILD PHASE 1 AND 2 UPPER MERION TO PLYMOUTH			
220-69 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
		01/27/25	
APPROVED	APPROVED		
APPROVED	APPROVED		
APPROVED	APPROVED		
SHEET 17 OF 18		C-250561-A5	

F

E

D

C

B

A

F

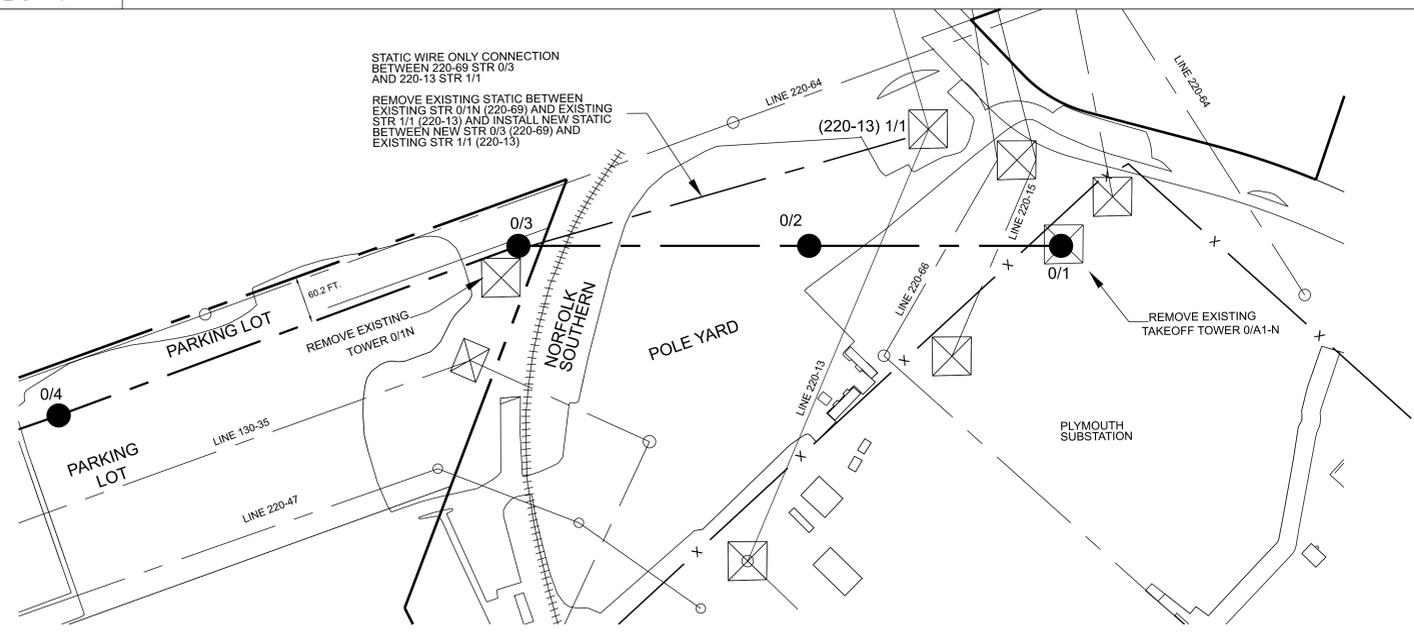
E

D

C

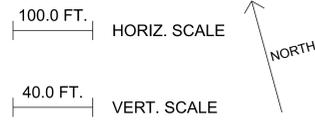
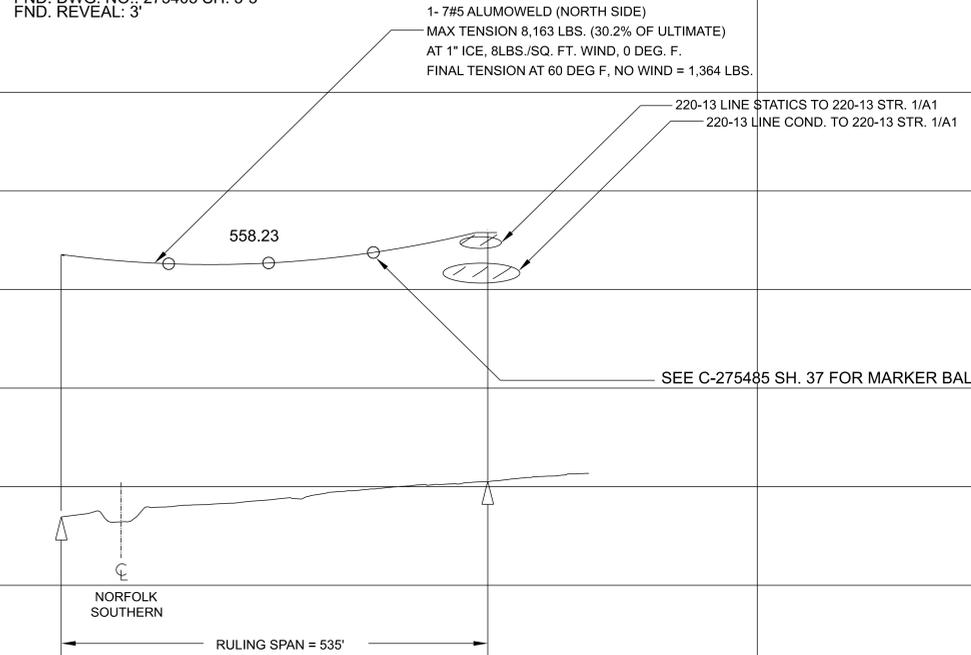
B

A



0/3
STATION: 285+41.88
LINE ANGLE: 19.80°
STR. HEIGHT: 130'
TYPE: UNIQUE-DE
T.O.C. ELEVATION: 137.3'
HT. T.O.C. TO COND.: 54.3'
FRAMING DWG. NO.: 250562 SH. 8
INS. ASSY.: S-7312 & S-7311
OPSW ASSY.: S-7350
OPCW ASSY.: S-7402
FND. DWG. NO.: 275405 SH. 3-5
FND. REVEAL: 3'

1/1 (220-13)
STR. HEIGHT: 125'
TYPE: LEGACY LATTICE TOWER
REPLACE SHIELD WIRE ATTACHMENT FOR SPAN TO STR. 0/3 (220-69)
FRAMING DWG. NO.: 250562 SH. 11



- NOTES:
- SEE GENERAL NOTES ON SHEET 1 OF THIS DRAWING
 - ALL WIRES DISPLAYED AT 60° F.

REFERENCE DRAWINGS:

DRAWING NUMBER	SHEET	DESCRIPTION
C-250561	1	COVER SHEET
C-250561	2	STRUCTURE LIST
C-250561	3-18	PLAN & PROFILE
C-275405	1-2	STRUCTURE STAKING
C-275405	3-5	FOUNDATION SCHEDULE
C-275484	1-3	DAMPER SCHEDULE
C-275484	4-36	STRINGING CHARTS
C-275486	1-7	FIBER CONNECTION MAP

PLAN LEGEND

---	R.O.W. LINE
- - -	CENTERLINE OTHER CIR.
- - -	CENTERLINE 220-69
⊠	EXISTING TOWER
○	EXISTING POLE
●	NEW POLE
+++++	RR TRACKS
-x-x-	SUBSTATION FENCELINE
-G-G-	GAS PIPELINE
-S-S-	SEWER PIPELINE
-W-W-	WATER PIPELINE
-E-E-	UNDERGROUND ELECTRIC



TABLE OF ADDITIONS & CHANGES

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A4	03/14/25	EC* 303558 WP* 18360473 & 19393608 SARGENT & LUNDY UPDATED: STR 0/2 AND 0/3 LOCATIONS & ASSOCIATED TENSIONS ISSUED FOR CONSTRUCTION	S&L	S&L	S&L
A5	09/18/25	EC* 303558 WP* 18360473 & 19393608 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A2	07/26/24	EC* 303558 WP* 18360473 & 19393608 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR APPROVAL	S&L	S&L	S&L
A3	01/27/25	EC* 303558 WP* 18360473 & 19393608 SARGENT & LUNDY UPDATED: THIS DRAWING ISSUED FOR CONSTRUCTION	S&L	S&L	S&L

CIVIL		250561	
PLAN AND PROFILE CONOWINGO REBUILD PHASE 1 AND 2 UPPER MERION TO PLYMOUTH			
220-69 LINE PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	S&L	S&L	S&L
INSPECTED	APPROVED	DATE	
S&L		01/27/25	
APPROVED:	APPROVED:		
APPROVED:	APPROVED:		
APPROVED:	APPROVED:		
SHEET 18 OF 18		C-250561-A5	

Letter of Notification Filing Checklist
PECO Conowingo 220-69 Line

In an effort to facilitate the Commission’s review process for a Letter of Notification (“LON”) for the Siting and Construction of Electric Transmission Lines, the following checklist may be consulted by the applicant. The applicable regulatory requirements for a LON application are found in 52 Pa. Code §§ 57.71-77. The checklist is provided to streamline the review process by anticipating requests for additional information that may arise from Commission staff. The checklist does not create additional mandates or regulatory requirements for approval of a LON.

1. Provide the name of the applicant and the address of its principal business office.

PECO Energy Company
2301 Market Street
Philadelphia, PA 19103

2. Name, title and business address of the attorney of the applicant and the person authorized to receive notice and communications with respect to the application if other than the attorney or the applicant.

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

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

3. General description of the proposed route of the HV line, to include the number of route miles, the right-of-way width and the location of the proposed HV line within each city, borough, town and township traversed. Describe which sections of 52 Pa. Code §57.72(d)(1)(i)-(vi) the applicant believes are applicable.

PECO proposes to rebuild its existing 220-69 Line (the “Project”), which is a 230 kV transmission line running from the Plymouth Meeting Substation to the Upper Merion Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania. The line is approximately 5.6 miles, composed of 34 structures,

and entirely located within PECO's existing right-of-way that is approximately 315 feet wide. Twenty-five of the existing structures are 1920s vintage, single-circuit, steel lattice towers with 795 Kcmil Aluminum Conductor, Steel Reinforced ("ACSR") conductors in a horizontal configuration and 183 MCM ACSR static wire. The remaining nine existing structures are dual-circuit, weathering steel monopoles supported on drilled pier foundations and support three phases of 1590 ACSR conductor in a delta configuration and 203 MCM ACSR static wire.

PECO proposes to replace the existing 25 single-circuit steel lattice structures with new, dual-circuit, weathering steel monopoles supported on drilled pier concrete foundations that will all be entirely within PECO's existing right-of-way. PECO also proposes to reuse the remaining nine existing structures but will replace the conductors for consistency with the rest of the Project. For the entire 220-69 Line, the new circuit will utilize advanced conductors, 959.6 Kcmil Aluminum Conductor, Steel Supported "Suwannee," and will be designed for two conductors per phase such that each of the three phases carrying power will have two wires except for the span between structures 5-2N and 5-3N.¹

The 220-69 Line is one of 12 circuits along the approximately 60-mile Conowingo right-of-way from the Conowingo Substation in Maryland to the Plymouth Meeting Substation. Only the 220-69 Line is within the scope of this Project, and PECO will file future projects for approvals along the Conowingo right-of-way in separate proceedings, as needed.

This application is made pursuant to two provisions of 52 Pa. Code § 57.72(d)(1):

- 52 Pa. Code § 57.72(d)(1)(i): An HV line which is proposed to be located entirely on an existing transmission line right-of-way, so long as the size, character design or configuration of the proposed HV line does not substantially alter the right-of-way. The Project meets this criterion because it will be constructed entirely within PECO's existing transmission line right-of-way.
- 52 Pa. Code § 57.72(d)(1)(v): An HV line which is to be reconducted or reconstructed so long as the size, character, design or configuration of the proposed HV line does not substantially alter the right-of-way. The Project meets this criterion because it includes only reconstructing PECO's existing transmission line, and the size, character, design, and configuration of the proposed new transmission line will not substantially alter the existing right-of-way.

¹ PECO considered alternative engineering solutions and advanced transmission technologies and chose conductors for the Project consistent with the statement issued on March 27, 2025, in Docket No. A-2024-3052612.

4. Provide a general statement of the need for the proposed HV line in meeting identified present and future demands for service, of how the proposed HV line will meet that need and of the engineering justification for the proposed line.

Much of the existing 220-69 Line transmission line is 1920s vintage, and thus the structures, foundations, and conductors are all nearing 100 years old and are at end of life. The Project is needed to remove the aging infrastructure and increase reliability along a critical right-of-way. The transmission line ratings will increase by over 50% by utilizing modern technology, high-temperature, low-sag conductors, i.e., Aluminum Conductor, Steel Supported “Suwannee.” Improvements will be made to communications between substations by installing new Optical Ground Wire. Transmission outages will be used for line rebuilds and replacement of obsolete substation equipment such as relays, circuit breakers, and disconnect switches that will support the new 220-69 Line upgrades. The Project will also support the overall reliability of PECO’s transmission system.

The rating of the 220-69 Line before and after the Project are included as **CEII/CONFIDENTIAL** Attachment 3.

5. Please provide an engineering assessment of the project including information to address the following:

a) Provide an analysis of minimum conductor clearances and conductor thermal ratings.

Conductor clearances for the project meet or exceed the requirements of PECO’s Engineering Practice EPP-2090 OHT Design Clearances. The clearance requirement in EPP-2090 exceeds the requirements of NESC 2023. Examples of PECO clearance requirements are provided in subsection b, below.

b) Provide engineering design criteria and parameters such as vertical clearance to ground.

Ground, Farmland	25.4’
Roadways, driveways, parking lots	25.4’
Railroads, above top or rail	33.4’
Area not accessible by vehicles	21.4’

c) Provide an explanation as to how the project will be in compliance with the current NESC and, where applicable, information on how the applicant’s design specifications and safety rules may exceed NESC suggested standards for transmission lines.

The right-of-way width for the proposed project is governed by the conductor displacement due to wind with the assumption that buildings can be erected on the

easement line regardless of local municipality building setback requirements. The right-of-way width provided exceeds the requirements of NESC and PECO's Engineering Practice EPP-2090, "OHT Design Clearances" and will provide access for line maintenance, repair, and vegetation management.

- 6. If applicable, provide the current height of the structures expected to be replaced, the proposed height of the new structures to be installed and the height of the structures to remain in place. Provide the number of structures proposed vs. current number of structures. Provide the location and footprint of the current structures compared to the proposed structures.**

The existing number of structures is 34. The number of proposed structures (including structures to remain and take-off structures) is 46.

Reference the below table for new and proposed structure heights.

Structure Number	Existing Structure Height (ft)	Proposed Structure Height (ft)
0/1	90	90
0/2	N/A	80
0/3	107	130
0/4	N/A	150
0/5	113	165
0/6	N/A	160
0/7	N/A	155
0/8	118	180
0/9	N/A	165
1/1	135	180
1/2	N/A	180
1/3	80	135
1/4	93	160
1/5	N/A	135
1/6	83	135
1/7	82	130
1/8	92	145
2/1	90	150
2/2	105	175
2/3	140	180
2/4	138	190
2/5	N/A	190

2/6	147	160
2/7	N/A	140
3/1	89	145
3/2	90	145
3/3	80	140
3/4	N/A	150
3/5	70	135
3/6	80	150
3/7	78	135
4/1	N/A	130
4/2	88	130
4/3	N/A	130
4/3-1	100	130
4/3-2	N/A	140
4/3-3	90	120

See PECO Attachment 1, which consists of the proposed plan and profile of the project and shows the location of the proposed structures in relationship to existing structures.

- 7. If applicable, state if any properties/easements that did not previously have structures will now have a structure. State if the easement agreement allows for structures on these properties that did not previously have a structure. Explain the Company's process of informing the property owners that a structure will be placed on the easement to their property.**

No additional properties or easements are required for this Project. The new structures will be placed entirely within PECO's existing right-of-way.

- 8. If applicable, what is the PJM project ID No. for the proposed project? Has this project been submitted to the PJM Transmission Expansion Advisory Committee (TEAC)? If so, please provide a description of the project as submitted to the TEAC. If this project is part of a larger project, summarize the larger project of which the LON is a part. Please describe how this project may mitigate potential planning criteria violations.**

The PJM project ID No. for the proposed Project is s3186.1. The Project need and solution were presented to the Transmission Expansion Advisory Committee as shown below. The Project is a supplemental project addressing the need to replace transmission facilities due to the following driver:

Equipment Material Condition, Performance and Risk – Degraded equipment performance, material condition, obsolescence, equipment failure, employee and public safety and environmental impact.

The Project is not associated with PJM baseline projects that are ordered by PJM and designated to PECO to address planning criteria violations.

As part of that presentation, PECO included a preliminary cost estimate at an initial planning level. Modifications to a proposed project’s cost estimate are typical as a project’s design nears completion. In this instance, the proposed Project’s cost estimate increased to approximately \$50.2 million. This amount is based on PECO’s completion of approximately 90% of the design after the TEAC presentation and before filing this Letter of Notification.

PECO’s proposed Project is a PJM Regional Transmission Expansion Plan (“RTEP”) Project. PJM prepares an annual RTEP that contains transmission developments needed to ensure reliable transmission service. PJM requests quarterly project updates on RTEP projects, including, but not limited to, engineering progress status, cost estimates, and construction updates. This process recognizes that cost estimates that are originally provided to PJM are planning-level estimates that may change as the project progresses through design, engineering, and construction. These updates are then publicly posted on PJM’s website. PECO provided PJM the updated total project cost in PECO’s last quarterly update on August 1, 2025.



M-3 Process PECO Transmission Zone
220-69 Plymouth Meeting – Upper Merion 230 kV Line Rebuild

- Need Number:** PE-2023-010
- Process Stage:** Solutions Meeting 10/31/23
- Previously Presented:** Need Meeting 10/3/223
- Project Driver:**
 - Equipment Material Condition, Performance and Risk
- Specific Assumption Reference:**
 - Transmission infrastructure replacements (EOL/condition/obsolescence) that are consistent with efficient asset management decisions
- Problem Statement:**
 - The 230 kV line 220-69 Plymouth Meeting – Upper Merion is a 4.5 mile line with 795 kcmil 30/19 ACSR conductor and 184 kcmil ACSR static wire that was constructed in 1927. This line is 96 years old and nearing end of useful life.
 - There are 34 structures along this ROW, 25 of which that are the original steel lattice towers erected in 1927, which are showing signs of corrosion on the tower members, wear to vang plates, insulators, and insulator hardware.
 - Inspections of the static and phase conductors identified that they were in poor condition and need to be replaced.



PJM TEAC – PECO Supplemental 10/31/2023



M-3 Process PECO Transmission Zone
220-69 Plymouth Meeting – Upper Merion 230 kV Line Rebuild

Need Number: PE-2022-010
Process Stage: Solution Meeting 10/31/23

- Proposed Solution:**
- Rebuild approx. 4.5 miles with new dual circuit, weathering steel monopole structures and 959.6 kcmil ACS5 conductor.
 - Replace various substation equipment at Plymouth Meeting and Upper Merion substations to make the conductor the limiting element.

Existing ratings (MVA):	SN/SE	WN/W
220-69 Plymouth – Merion	418/519	518/597
New ratings (MVA):	SN/SE	WN/W
220-69 Plymouth – Merion	762/884	799/922

Estimated cost: \$29.2M
Alternatives Considered: Replacing only the static wire, conductors, insulators, and hardware.

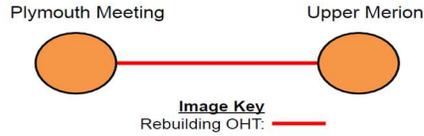
This alternative was not pursued since most of the current structures are 96 years old, in deteriorating condition, and wouldn't be able to support the lifespan of the replacement conductor.

Projected In-Service: 12/31/26

Project Status: Engineering

Model: 2028 RTEP

PJM TEAC – PECO Supplemental 10/31/2023



9. Provide a breakdown of project costs. Please explain who will own, finance and build the proposed project.

PECO estimates the total Project cost to be \$50.2 million. Of that cost, \$13.5 million is attributed to materials (new conductor/hardware, optical ground wire, structures, foundations, substation equipment). The remaining costs are attributable to direct labor—primary engineering and design, clearance reviews, and electrical/civil construction—and allocated to PECO overhead and management costs. PECO will own, finance, and build the proposed Project. The Department of Energy will reimburse \$7 million of the above cost utilizing the Infrastructure Investment and Jobs Act funding. The Department of Energy has partially reimbursed PECO on a monthly basis totaling \$169,337, with the last reimbursement received on May 30, 2025.

10. If available at the time the LON is filed, please provide a copy of any comments received from state or local officials.

Not applicable; to-date, PECO has not received any comments regarding the proposed Project or this Letter of Notification.

11. Please provide the anticipated construction commencement date and the proposed in-service date of the project.

The anticipated construction commencement date is in February 2026 for pouring concrete foundations. The remainder of the Project requires taking a transmission outage, currently scheduled for September 13, 2027, to December 10, 2027. The proposed in-service date of the Project is December 30, 2027.

12. Provide evidence to show that the size, character, design and configuration of the proposed HV line will not substantially alter its existing right-of-way, if applicable. Please identify all alterations necessary to the existing right-of-way.

The Project involves replacing, reframing, or installing new structures within the existing right-of-way as described in the response to Question 6. New structures will be located closer to the edge of the right-of-way. Clearances to the right-of-way's edge have been maintained according to NESC requirements described in Question 5. *See* PECO Attachment 1.

13. A statement identifying the filing date on which the filing of the LON was or is to be made and a statement as found in 57.72(d)(iv) regarding the Commission's review.

This Letter of Notification is being filed today, October 7, 2025. PECO understands that, pursuant to 52 Pa. Code §§ 57.72(d)(4)(iv) and (d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the Project will be constructed as proposed herein without the application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

14. Provide the number of streams and/or wetlands that will be crossed. Describe how these will be addressed. Will any endangered or threatened species be affected? If a PNDI is required, please provide the results.

The Project will cross 11 wetland areas and eight streams, including five perennial streams and three intermittent streams. One of the perennial streams is the Schuylkill River. There are no proposed direct or indirect impacts to these features. One wetland and one intermittent stream were identified within a temporary workspace associated with pole replacement activities, which will be timber matted and restored following construction with no permanent impacts proposed. One Pennsylvania Department of Environmental Protection ("PADEP")-regulated floodway will be permanently impacted by the installation of a new monopole structure (1/2), and PECO will comply with all applicable regulations of PADEP and the U.S. Army Corps of Engineers. No wetlands or streams are proposed to be directly impacted by the installation of new monopoles as a result of the Project. Erosion and sediment control devices and best management practices will be in place to prevent sedimentation and impacts to these features.

A Pennsylvania Natural Diversity Inventory ("PNDI") was required and identified an avoidance measure from the Pennsylvania Game Commission and U.S. Fish and Wildlife Service for the northern long-eared bat. The avoidance measure, with which PECO will comply, indicates that tree removal may not occur between May 15 to August 15. The PNDI also identified a Pennsylvania Fish and Boat Commission ("PFBC")-sensitive species. However, upon further review, and after consultation with PECO, the PFBC determined that no adverse impacts are expected to the species of special concern due to the Project.

15. Indicate the number of circuits on the proposed line. Note that if only one is being installed at this time, another LON may be needed when the second circuit is added.

One circuit will be installed for the Project. If PECO proposes to install a second circuit on the line during a future project, PECO will seek all necessary approvals at that time.

16. Please provide a copy of the certificate of service.

The certificate of service is attached to the filing.

17. Provide the specific NERC or other regulatory standard criteria which is driving the proposed project (e.g. TPL-004-1, P.2).

Not applicable.

18. Explain why the NERC, or other regulatory standard, violation, is now an issue where it wasn't previously.

Not applicable.

19. Explain whether the proposed project meets NERC or PJM minimum planning criteria or whether it exceeds these criteria to meet transmission owner planning criteria. If the project exceeds either of these minimum planning criteria to meet transmission owner criteria, provide a detailed explanation as to why.

The proposed Project is not driven by NERC or PJM minimum planning criteria. The Project is a supplemental project addressing the need to replace transmission facilities due to the material age and condition of the equipment and risk posed by further usage of the equipment. As such, the Project is necessary to maintain reliability by replacing transmission infrastructure before it reaches the end of its useful life and/or fails.

20. Explain whether load growth in the area has led to any change in circumstances as it relates to the need for the proposed project. If so, quantify these load growth impacts.

Not applicable.

21. State the age and anticipated service life and describe the overall health of the transmission line facilities to be replaced. Additionally, include information related to conditions which may have accelerated aging or led to premature failure of the facilities (e.g. corrosive environment).

The majority of this circuit was constructed in 1927, with the original towers, conductors, and static wire remaining in service. The service life of the new transmission monopoles and appurtenances is expected to be over 70 years. PECO's Accounting department also estimates the expected lifespan of transmission conductors at 62 years. Static wires are currently experiencing end-of-life issues, and some phase conductors are in poor or marginal condition. Miscellaneous insulators, hardware, and steel lattice structural members, such as static wire vang plates, are also approaching end of life and are currently being replaced as corrective maintenance when identified through comprehensive aerial inspections. Galvanized coating on the lattice structures has worn away over time, and the structures are now being protected with paint.

PECO concluded that the existing 220-69 Line structures are at end of their anticipated life, considering PECO's estimates for the service life of the components and the fact that the associated equipment was installed nearly 100 years ago.

22. Provide information regarding any unplanned outages on the subject transmission facilities over the previous 5 years (or more), including the duration, cause, whether service to customers was interrupted by outages on the subject transmission line(s), and if so, the number and type of customers which were impacted. Additionally, explain whether the proposed project would mitigate the effects of these outages.

There have been no unplanned interruptions on the 220-69 line within the last 10 years.

23. Explain whether alternative solutions were considered. If so, provide a brief description of the alternative(s) and provide a detailed explanation of why the chosen solution was selected.

An alternative to replace all conductors, insulators and hardware and establish a painting program was considered. A rebuild was selected as it provides the most comprehensive update to the circuit, allows for future expansion such that the structures can be designed to current PECO standards, and allows for PECO to construct the Project entirely within existing PECO right-of-way.

24. Explain whether any of the loads served by the transmission facilities to be replaced are considered to be critical customers.

The 220-69 Line is an integrated part of the PJM transmission system and thus does not serve individual customers.

25. Quantify the anticipated increase in reliability in terms of customer average interruption duration index, system average interruption duration index, and system average interruption frequency index.

PECO considers the lifespan of a tower and fixtures to be approximately 70 years. The existing 220-69 Line towers, conductors, and static wire are at the end of life with reliability trending downwards. The new monopole structures proposed for the Project will provide an increase in reliability by eliminating existing deterioration in the 220-69 Line.

26. If a transmission owner customer requested the proposed project and is not paying the entire cost, explain why the costs will be assumed by other transmission owner customers.

Not applicable.

27. Provide a detailed description of the methodology used to determine that the subject transmission facilities have reached the end of their useful service life. Additionally, provide any survival curves or utility specific data used in this determination.

On January 9, 2025, PECO filed responses to the Bureau of Technical Utility Services' first data requests for PECO's Letter of Notification for the Conowingo 220-47 project (Docket No. A-2024-3052612). As part of the response to TUS-A-1, PECO filed confidential Attachment TUS-1-1, which is a 2021 study for 12 circuits of the approximately 60-mile Conowingo right-of-way, including the 220-69 Line. The study used a Kinectrics LineVue system to determine the condition of static wire and conductors along the Conowingo right-of-way. Phase conductors were tested at 12 different locations, and the static wire was tested at 25 different locations. The study showed that 50% of the phase conductors and 72% of the static wire require replacement. PECO believes that the overall condition of the existing 220-69 Line conductors and static wire closely align with the overall results for the transmission facilities along the Conowingo right-of-way as all the circuits were built at the same time and according to the same standards. In addition, PECO provided survival curve information as confidential Attachment TUS-1-2. Due to the confidential nature of these documents, PECO refers to the confidential Attachments TUS-1-1 and TUS-1-2 previously filed in Docket No. A-2024-3052612 that equally relate to the 220-69 Line but is not separately refiling those documents as part of this Letter of Notification.

See also PECO response to Question 21 above regarding end of life.

**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-_____**
**Construction of the Conowingo 220-69 Line :
Located in Plymouth Township and Upper :
Merion Township, Montgomery County, :
Pennsylvania :**

VERIFICATION

I, Drew T. Davis, hereby declare that I am the Vice President, Transmission and Substations 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 Letter of Notification 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: 09/30/2025



Drew T. Davis
Vice President, Transmission and Substations

**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-_____
Construction of the Conowingo 220-69 Line :
Located in Plymouth Township and Upper :
Merion Township, Montgomery County, :
Pennsylvania :**

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 Letter of Notification pursuant to 52 Pa. Code § 57.74 were served by certified mail, return receipt requested, a copy of the above-captioned Letter of Notification.

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
akaster@pa.gov

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
PO 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

Michael P. Clarke, Esq.
Plymouth Township Solicitor
Rudolph Clarke, LLC
350 Sentry Parkway East, Building 630
Suite 110-A
Blue Bell, PA 19422

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

Plymouth Township
700 Belvoir Road
Plymouth Meeting, PA 19462
Attn: Karen R. Bramblett, Chair

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

PA Department of Environmental Protection
Market Street State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Attn: Office of Field Operations

The Department of Environmental Resources
101 S. Second Street
P.O. Box 2357
Harrisburg, PA 17120
Attn: Bureau of Environmental Planning

PA Department of Transportation
Commonwealth Keystone Building
400 North Street, 5th Floor
Harrisburg, PA 17120
Attn: Jeffery Spotts, Chief Counsel

PA Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Fl.
400 North Street
Harrisburg, PA 17120-0053
Attn: Douglass C. McLearn, Chief

PA Department of Conservation & Natural
Resources
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17105-8767
Attn: Rebecca Bowen, Ecological Services
Section Chief

U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Road, Suite 101
State College, PA 16801-4850
Attn: Lesa Lindsay, Administrative Officer

PA Fish and Boat Commission
Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823-9620
Attn: Christopher A. Urban, Chief

PA Game Commission
2001 Elmerton Avenue
Harrisburg, PA 17110-9797
Attn: Dr. Matthew Schnupp, Director

U.S. Army Corps of Engineers
Baltimore District Corporate Communication
Office
2 Hopkins Plaza
Baltimore, MD 21201
Attn: Planning Division

Federal Aviation Administration
Eastern Obstruction Evaluation
10101 Hillwood Parkway
Fort Worth, TX 76177
Attn: Dave Maddox

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

Dated: October 7, 2025

A handwritten signature in black ink, reading "Kenneth M. Kulak". The signature is written in a cursive style with a prominent initial "K".

Kenneth M. Kulak
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Philadelphia, PA 19103-3007
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