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October 24, 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-2025-3057875**

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-1 to A-3.

As indicated on the enclosed Certificate of Service, copies 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**

**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 : Docket No. A-2025-3057875
Located in Plymouth Township and Upper :
Merion Township, Montgomery County, :
Pennsylvania :**

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

TUS-A-1:

Reference the Letter of Notification, Paragraph 10. Please provide a cost benefit analysis for replacing the infrastructure versus continued maintenance.

RESPONSE:

Much of the 220-69 Line was constructed in the 1920s. In its current state, the existing 220-69 Line requires new conductors, static wires, insulators and hardware, paint, and vang plates to continue long term operation due to the age of the line and its components. Based on the age of the existing transmission structures, the structures likely need new bolts and other structural member replacements to remain in service. PECO estimates the cost of these maintenance activities to be approximately \$20 million.

In addition, PECO expects that larger capacity conductors will be required for this circuit in the near future due to increased load demands. The larger capacity conductors that PECO plans to install on the rebuilt line are heavier than the existing conductors on the current line. The existing transmission structures do not have the capacity to support heavier conductors required for the anticipated increased load conditions.

By rebuilding the 220-69 Line now to PECO's current design standards, PECO will avoid approximately \$20 million of maintenance costs and ensure that the 220-69 Line is able to meet future needs that the existing structures, even if the maintenance activities were performed, would not be able to support. For example, PECO would still need to rebuild the line after the maintenance activities to support larger capacity conductors. The projected cost of \$50.2 million for the rebuilding project is also expected to be reduced by a \$7 million reimbursement from the United States Department of Energy, which would not be available for the maintenance project.

Matthew Homsher, Secretary
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TUS-A-2:

Reference the Letter of Notification, Attachment 2, Item 9. Please explain whether PECO anticipates funding from the Department of Energy to continue for the subject project

RESPONSE:

PECO has an active federal Infrastructure and Investment Jobs Act grant contract with the U.S. Department of Energy (“DOE”) for funding, including for the 220-69 Line (“Project”). The DOE has indicated that all funding determinations regarding grant contracts will be communicated to recipients by the end of October. PECO intends to continue to pursue Project reimbursements and will continue to compile and submit reimbursement requests to the DOE.

TUS-A-3:

Reference the Letter of Notification, Attachment 2, Item 21. Please provide a five-year history of maintenance expenses for transmission facilities to be replaced as part of the proposed project.

RESPONSE:

In the past five years, PECO has spent approximately \$10,000 on various maintenance items including hardware repair and inspections. However, much of the existing 220-69 Line is nearing 100 years of service and the structures, foundations, and conductors are at end of life. As described in response to TUS-A-1, PECO would need to perform significant additional maintenance activities in order for the line to remain in service, costing approximately \$20 million. Given the age of the line, PECO is unable to estimate the amount of time that the maintenance activities could extend the service life of the existing line before additional significant maintenance activities would be required. Moreover, even if the maintenance activities are performed, the line would still need to be rebuilt in the future to accommodate larger capacity conductors.

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VERIFICATION

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: October 24, 2025



Drew T. Davis
Vice President, Transmission and Substation

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CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the **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

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Dated: October 24, 2025



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