

Morgan Lewis

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November 4, 2025

VIA E-FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

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

Dear Secretary Homsher:

Enclosed for filing in the above-captioned proceeding are PECO Energy Company's
Response to the Data Request of the Bureau of Technical Utility Services Set 1, Question
No. 1.

As evidenced by the enclosed Certificate of Service, copies of the enclosed responses are
being served upon the Bureaus of Investigation and Enforcement and Technical Utility
Services, the Office of Consumer Advocate, and the Office of Small Business Advocate.

If you have any questions regarding this filing, please contact me at 215.963.5384.

Sincerely,



Kenneth M. Kulak

KMK/nt

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Pennsylvania Public Utility Commission
Petition of PECO Energy Company for Approval of
Its Third Electric Long-Term Infrastructure Improvement Plan
at Docket No. P-2025-3056987

Responses of PECO Energy Company

To Data Requests of TUS Set I

November 4, 2025

TUS-I-1: Reference PECO's LTIIIP Petition

- a. Provide live electronic copies of the Summary of LTIIIP III Expenditures and Program Costs tables provided in Appendix A of PECO Exhibit No. 1.
- b. Provide a table that summarizes PECO's estimated spending versus actual spending, by year and program, for the years 2020 through 2025 under its second LTIIIP filed with the Commission at Docket No. P-2020-3020974.
- c. Provide a comparison of PECO's baseline expenditures versus expenditures under LTIIIP-III, by year, for the term of LTIIIP-III.

Response:

Refer to Attachment TUS-I-1.

Attachment TUS-I-1

LTIP III Appendix A Summary
\$M

	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units	Capital	Units	Capital	Units	Capital	Units	Capital	Units
PECO LTIP Spending Plan (\$ in million)												
Storm Hardening and Resiliency Programs												
1 CEMI Areas	\$ 24.9	15-20 (P)	\$ 43.6	15-20 (P)	\$ 44.7	15-20 (P)	\$ 45.8	15-20 (P)	\$ 46.9	15-20 (P)	\$ 205.9	75-100 (P)
<i>AIR Programs</i>												
2 AIR Areas	\$ 1.9	1-3 (P)	\$ 10.3	3-6 (P)	\$ 15.8	4-8 (P)	\$ 21.5	5-10 (P)	\$ 22.1	5-10 (P)	\$ 71.6	18-37 (P)
3 AIR Targeted Assets	\$ 49.8	10,000-12,000 (A)	\$ 50.5	10,000-12,000 (A)	\$ 61.3	12,000-14,000 (A)	\$ 65.1	12,000-14,000 (A)	\$ 66.5	12,000-14,000 (A)	\$ 293.2	56,000-66,000 (A)
4 Building Substation Retirement	\$ 22.5	-	\$ 19.7	1 (B)	\$ 20.2	-	\$ 20.7	1 (B)	\$ 21.2	-	\$ 104.3	2 (B)
5 Unit Substation Retirement	\$ 72.3	15-25 (U)	\$ 73.3	15-25 (U)	\$ 74.5	15-25 (U)	\$ 80.9	15-25 (U)	\$ 87.8	15-25 (U)	\$ 388.8	75-125 (U)
Underground Facilities Replacement Programs												
6 Main Stem Cable Replacement	\$ 33.1	15-30 (MI)	\$ 61.1	30-50 (MI)	\$ 57.0	30-50 (MI)	\$ 58.4	30-50 (MI)	\$ 57.0	30-50 (MI)	\$ 266.6	135-230 (MI)
7 URD Cable Replacement	\$ 106.3	220-300 (MI)	\$ 79.8	140-210 (MI)	\$ 70.8	140-210 (MI)	\$ 76.5	140-210 (MI)	\$ 85.5	140-210 (MI)	\$ 418.9	780-1,140 (MI)
8 Substation Switchgear Replacement Program	\$ 10.3	2 (S)	\$ 2.3	2 (S)	\$ -	-	\$ -	-	\$ -	-	\$ 12.6	4 (S)
9 Meter Replacement Program	\$ 10.5	40,000-60,000 (MR)	\$ 46.2	180,000-220,000 (MR)	\$ 51.8	180,000-220,000 (MR)	\$ 47.9	180,000-220,000 (MR)	\$ 49.2	180,000-220,000 (MR)	\$ 205.5	760,000-940,000 (MR)
Subtotal	\$ 331.6	-	\$ 386.8	-	\$ 396.1	-	\$ 416.8	-	\$ 436.2	-	\$ 1,967.4	-
Facility Relocation Projection	\$ 20.0	-	\$ 20.0	-	\$ 20.0	-	\$ 20.0	-	\$ 20.0	-	\$ 100.0	-
10 Total	\$ 351.6	-	\$ 406.8	-	\$ 416.1	-	\$ 436.8	-	\$ 456.2	-	\$ 2,067.4	-

KEY:	
Projects	P
Assets	A
Miles	MI
Meters	MR
Unit Substations	U
Building Substations	B
Switchgears	S

Attachment TUS-I-1

LTIP III Appendix A Program Cost Tables

\$M

PECO LTIP Spending Plan (\$ in million) CEMI Areas	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units								
	\$ 24.9	15-20 (P)	\$ 43.6	15-20 (P)	\$ 44.7	15-20 (P)	\$ 45.8	15-20 (P)	\$ 46.9	15-20 (P)	\$ 205.9	75-100 (P)
KEY: Projects P												

PECO LTIP Spending Plan (\$ in million) AIR Areas	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units	Capital	Units	Capital	Units	Capital	Units	Capital	Units
	\$ 1.9	1-3 (P)	\$ 10.3	3-6 (P)	\$ 15.8	4-8 (P)	\$ 21.5	5-10 (P)	\$ 22.1	5-10 (P)	\$ 71.6	18-37 (P)
KEY: Projects P												

PECO LTIP Spending Plan (\$ in million) AIR Targeted Assets	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units								
	\$ 49.8	10,000-12,000 (A)	\$ 50.5	10,000-12,000 (A)	\$ 61.3	12,000-14,000 (A)	\$ 65.1	12,000-14,000 (A)	\$ 66.5	12,000-14,000 (A)	\$ 293.2	56,000-66,000 (A)
KEY: Assets A												

PECO LTIP Spending Plan (\$ in million) Building Substation Retirement	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units								
	\$ 22.5	-	\$ 19.7	1 (B)	\$ 20.2	-	\$ 20.7	1 (B)	\$ 21.2	-	\$ 104.3	2 (B)
KEY: Building Substations B												

PECO LTIP Spending Plan (\$ in million) Unit Substation Retirement	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units								
	\$ 72.3	15-25 (U)	\$ 73.3	15-25 (U)	\$ 74.5	15-25 (U)	\$ 80.9	15-25 (U)	\$ 87.8	15-25 (U)	\$ 388.8	75-125 (U)
KEY: Unit Substations U												

Attachment TUS-I-1

LTIP III Appendix A Program Cost Tables

\$M

PECO LTIP Spending Plan (\$ in million) Main Stem Cable Replacement	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units								
	\$ 33.1	15-30 (MI)	\$ 61.1	30-50 (MI)	\$ 57.0	30-50 (MI)	\$ 58.4	30-50 (MI)	\$ 57.0	30-50 (MI)	\$ 266.6	135-230 (MI)

KEY:
Miles MI

PECO LTIP Spending Plan (\$ in million) URD Cable Replacement	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units	Capital	Units	Capital	Units	Capital	Units	Capital	Units
	\$ 106.3	220-300 (MI)	\$ 79.8	140-210 (MI)	\$ 70.8	140-210 (MI)	\$ 76.5	140-210 (MI)	\$ 85.5	140-210 (MI)	\$ 418.9	780-1,140 (MI)

KEY:
Miles MI

PECO LTIP Spending Plan (\$ in million) Substation Switchgear Replacement	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units								
	\$ 10.3	2 (S)	\$ 2.3	2 (S)	\$ -	-	\$ -	-	\$ -	-	\$ 12.6	4

KEY:
Switchgears S

PECO LTIP Spending Plan (\$ in million) Meter Replacement	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units	Capital	Units	Capital	Units	Capital	Units	Capital	Units
	\$ 10.5	40,000-60,000 (MR)	\$ 46.2	180,000-220,000 (MR)	\$ 51.8	180,000-220,000 (MR)	\$ 47.9	180,000-220,000 (MR)	\$ 49.2	180,000-220,000 (MR)	\$ 205.5	760,000-940,000 (MR)

KEY:
Meters MR

PECO LTIP Spending Plan (\$ in million) Facility Relocation Projection	2026		2027		2028		2029		2030		5 Year Total (2026-2030)	
	Capital	Units	Capital	Units								
	\$ 20.0	-	\$ 20.0	-	\$ 20.0	-	\$ 20.0	-	\$ 20.0	-	\$ 100.0	-

Attachment TUS-I-1

LTIP II Estimated and Actual Spend
\$M

	2021	2021	2022	2022	2023	2023	2024	2024	2025	2025	2021-2025	2021-2025	2021-2024	2021-2024	2021	2022	2023	2024	2025	2021-2025	2021-2024
	Plan	Actual	Plan	Actual	Plan	Actual	Plan	Actual	Plan	Forecast	Plan	Actual/Forecast	Plan	Actual	Actual vs. Plan	Actual/Forecast vs. Plan	Actual vs. Plan				
Storm Hardening and Resiliency Programs																					
CEMI Areas	\$ 13.5	\$ 12.0	\$ 13.5	\$ 13.0	\$ 13.5	\$ 7.1	\$ 13.5	\$ 7.6	\$ 13.8	\$ 11.9	\$ 67.8	\$ 51.6	\$ 54.0	\$ 39.7	\$ (1.5)	\$ (0.5)	\$ (6.4)	\$ (5.9)	\$ (1.9)	\$ (16.2)	\$ (14.3)
CEMI Targeted Circuits	\$ 6.5	\$ 5.4	\$ 6.6	\$ 8.0	\$ 6.7	\$ 7.4	\$ 7.2	\$ 6.6	\$ 7.4	\$ 5.0	\$ 34.4	\$ 32.4	\$ 27.0	\$ 27.4	\$ (1.1)	\$ 1.4	\$ 0.7	\$ (0.6)	\$ (2.4)	\$ (2.0)	\$ 0.4
Aerial Infrastructure Resiliency Programs																					
Aerial Infrastructure Resiliency Areas	\$ 4.9	\$ 6.0	\$ 5.0	\$ 4.2	\$ 5.1	\$ 6.8	\$ 5.2	\$ 5.3	\$ 5.3	\$ 4.4	\$ 25.5	\$ 26.7	\$ 20.2	\$ 22.3	\$ 1.1	\$ (0.8)	\$ 1.7	\$ 0.1	\$ (0.9)	\$ 1.2	\$ 2.1
Aerial Infrastructure Resiliency Targeted Assets	\$ 30.3	\$ 30.2	\$ 70.0	\$ 24.6	\$ 71.0	\$ 20.0	\$ 71.0	\$ 21.4	\$ 71.0	\$ 32.1	\$ 313.3	\$ 128.3	\$ 242.3	\$ 96.2	\$ (0.1)	\$ (45.4)	\$ (51.0)	\$ (49.6)	\$ (38.9)	\$ (185.0)	\$ (146.1)
Building Substation Retirement Program	\$ 21.0	\$ 14.4	\$ 22.0	\$ 17.0	\$ 14.0	\$ 9.9	\$ 14.0	\$ 14.2	\$ 14.0	\$ 34.7	\$ 85.0	\$ 90.2	\$ 71.0	\$ 55.5	\$ (6.6)	\$ (5.0)	\$ (4.1)	\$ 0.2	\$ 20.7	\$ 5.2	\$ (15.5)
Unit Substation Retirements	\$ 25.0	\$ 29.0	\$ 44.0	\$ 36.3	\$ 46.0	\$ 30.7	\$ 46.0	\$ 46.3	\$ 46.0	\$ 53.2	\$ 207.0	\$ 195.5	\$ 161.0	\$ 142.3	\$ 4.0	\$ (7.7)	\$ (15.3)	\$ 0.3	\$ 7.2	\$ (11.5)	\$ (18.7)
Underground Facilities Obsolescence Programs																					
Main Stem Cable Replacement	\$ 30.5	\$ 37.3	\$ 43.0	\$ 40.4	\$ 43.0	\$ 24.2	\$ 43.0	\$ 34.6	\$ 45.0	\$ 40.6	\$ 204.5	\$ 177.1	\$ 159.5	\$ 136.5	\$ 6.8	\$ (2.6)	\$ (18.8)	\$ (8.4)	\$ (4.4)	\$ (27.4)	\$ (23.0)
Underground Res Development (URD) Cable Replacement	\$ 51.5	\$ 53.3	\$ 80.0	\$ 70.7	\$ 87.0	\$ 62.6	\$ 90.0	\$ 74.0	\$ 92.0	\$ 86.3	\$ 400.5	\$ 346.9	\$ 308.5	\$ 260.6	\$ 1.8	\$ (9.3)	\$ (24.4)	\$ (16.0)	\$ (5.7)	\$ (53.6)	\$ (47.9)
Switchgear Replacement Program	\$ 0.5	\$ 0.2	\$ 6.5	\$ 2.7	\$ 8.5	\$ 8.7	\$ 5.0	\$ 16.6	\$ 0.5	\$ 11.6	\$ 21.0	\$ 39.8	\$ 20.5	\$ 28.2	\$ (0.3)	\$ (3.8)	\$ 0.2	\$ 11.6	\$ 11.1	\$ 18.8	\$ 7.7
Electric LTIP Eligible/Programs	\$ 183.7	\$ 187.8	\$ 290.6	\$ 216.9	\$ 294.8	\$ 177.4	\$ 294.9	\$ 226.6	\$ 295.0	\$ 279.9	\$ 1,359.0	\$ 1,088.6	\$ 1,037.0	\$ 781.3	\$ 5.2	\$ (75.1)	\$ (118.1)	\$ (67.7)	\$ (12.7)	\$ (268.4)	\$ (255.7)
Facility Relocation Projection	\$ 15.0	\$ 7.3	\$ 15.0	\$ 8.1	\$ 15.0	\$ 16.0	\$ 15.0	\$ 19.8	\$ 15.0	\$ 23.8	\$ 75.0	\$ 75.0	\$ 60.0	\$ 51.2	\$ (7.7)	\$ (6.9)	\$ 1.0	\$ 4.8	\$ 8.8	\$ -	\$ (8.8)
Total	\$ 198.7	\$ 195.1	\$ 305.6	\$ 225.0	\$ 309.8	\$ 193.4	\$ 309.9	\$ 246.4	\$ 310.0	\$ 303.7	\$ 1,434.0	\$ 1,163.6	\$ 1,097.0	\$ 832.5	\$ (2.5)	\$ (82.0)	\$ (117.1)	\$ (62.9)	\$ (3.9)	\$ (268.4)	\$ (264.5)

Attachment TUS-I-1

LTIIIP III Baseline and LTIIIP Spend (excluding Facility Relocation)

\$M

	2026	2027	2028	2029	2030	Total LTIIIP III
Baseline	\$ 283.2	\$ 297.2	\$ 298.8	\$ 306.8	\$ 309.3	\$ 1,495.3
LTIIIP	\$ 331.6	\$ 386.8	\$ 396.1	\$ 416.8	\$ 436.2	\$ 1,967.4

VERIFICATION

I, Iris Boci, hereby declare that I am the Vice President of Technical Services of PECO Energy Company; that I am authorized to make this verification on behalf of PECO Energy Company; that the facts set forth in the foregoing Data Request responses 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. § 4904 pertaining to false statements to authorities.

Date: November 4, 2025

Iris Boci

Iris Boci
Vice President of Technical Services

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF ITS :
THIRD ELECTRIC LONG-TERM : **Docket No. P-2025-3056987**
INFRASTRUCTURE IMPROVEMENT :
PLAN FOR THE PERIOD JANUARY 1, :
2026 THROUGH DECEMBER 31, 2030 :

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of **PECO Energy Company's Responses to TUS Data Request Set 1** 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: November 4, 2025

Counsel for PECO Energy Company