

# Morgan Lewis

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November 12, 2025

## VIA ELECTRONIC FILING

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> 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 Project Located in Falls Township, Bucks County, Pennsylvania  
Docket No. A-2025-3058203**

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-5.

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 :**                   **Docket No. A-2025-3058203**  
**Construction of the Project Located in Falls :**  
**Township, Bucks County, Pennsylvania :**

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

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**TUS-A-1:**

Reference the Letter of Notification, Paragraph 9. Please state separately the transmission costs and distribution costs. Additionally, please provide a detailed explanation as to how PECO differentiates between transmission and distribution for customers taking service at 230 kV.

**RESPONSE:**

Of the total \$8.13 million Project cost, approximately \$4,870,000 are transmission costs and approximately \$3,257,840 are distribution costs.

PECO Plant Accounting, Capital Project Management, Maintenance Program Management, as well as financial and regulatory personnel reviewed the Project to classify PECO assets as Transmission or Distribution. PECO functionalized capital assets as Transmission or Distribution and assigned the assets to utility accounts in accordance with FERC's Uniform System of Accounts and pursuant to FERC's Seven Factor Test under FERC Order 888. PECO classified the proposed high voltage distribution line as Distribution because the asset will be in close proximity to the single retail customer that the line will serve, primarily radial in character, and carry power consumed in the restricted geographical area of the customer's data center.

**TUS-A-2:**

Reference the Letter of Notification, Paragraph 9. Please provide a detailed explanation as to how PECO will recover its investment should the customer decide to cancel the subject project.

**RESPONSE:**

The customer has signed a Transmission Security agreement ("TSA") for this project. The TSA includes a Letter of Credit ("LOC") and/or a parent guarantee for ten years' worth of transmission revenue that will be obtained before PECO proceeds with the project to

secure PECO’s investment. Once the customer is energized and meets 80% of their initial projected load, the LOC and/or parent guarantee will be reduced on a yearly basis as the customer achieves projected load amounts.

The customer also signed a Distribution Security agreement and will provide PECO with a LOC and/or a parent guarantee for the projected distribution costs of the Project. The high voltage distribution assets will also be subject to a five-year line extension credit. Once the customer is energized, the LOC will be reduced on a yearly basis based on the revenue the customer spends with PECO. If the revenue from the customer has not equaled the entire cost of the distribution system upgrades five years after energization, PECO will be able to exercise the LOC to collect the remaining costs. If the revenue from the customer has covered the entire cost of the distribution system upgrades, the customer will not owe any additional amounts, and the LOC will be released. If the customer is not energized, PECO can exercise the LOC to recover the cost of distribution system upgrades.

**TUS-A-3:**

Reference the Letter of Notification, Attachment 3, item 3. Please state the approximate width of the right-of-way for the proposed 220-90 and 220-91 230 kV line taps.

**RESPONSE:**

The approximate width of the right-of-way is 200 feet.

**TUS-A-4:**

Reference the Letter of Notification, Attachment 3, item 6. Please state the approximate height of nearby existing transmission line structures.

**RESPONSE:**

The Project includes tapping into the existing 220-90 Line and 220-91 Line. Nearby existing transmission structures on these lines are identified below.

<b>Existing Line</b>	<b>Existing Transmission Structure</b>	<b>Height of Existing Transmission Structure</b>
220-90 and 220-91	P2-15	138 feet
220-90	P2-17	145 feet
220-91	P2-16	145 feet

**TUS-A-5:**

Reference the Letter of Notification, Attachment 3, item 8. Please provide the approximate date PECO anticipates completion of PJM’s do no harm analysis.

**RESPONSE:**

PECO presented the Project solution to PJM on November 4, 2025, and PJM began the do no harm analysis on November 5, 2025. PECO estimates the do no harm analysis will take approximately six months to complete, and PECO will request an expedited timeline to complete the do no harm analysis within four months. PECO will provide the results of the do no harm analysis for the Project after PJM has provided PECO with its results.


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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: 11/12/2025

  
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Drew T. Davis  
Vice President, Transmission and Substation

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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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**

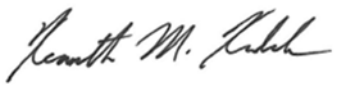
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Dated: November 12, 2025

  
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