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AN EXELON COMPANY

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November 13, 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:

PECO Energy Company hereby submits these Reply Comments in response to the Comments submitted by the Office of Consumer Advocate (“OCA”) on September 19, 2025, in the above-captioned matter regarding PECO’s Third Electric Long-Term Infrastructure Improvement Plan (“LTIIIP III”) for the period 2026 through 2030. These Reply Comments provide further clarification about the Company’s undergrounding efforts and supplement the information set forth in PECO’s LTIIIP III Petition filed on August 20, 2025.

In its Comments, the OCA suggests that consideration of undergrounding storm-vulnerable aerial facilities should be a “core feature” of storm hardening and resiliency efforts by PECO and other electric distribution companies. The OCA further recommends that the Pennsylvania Public Utility Commission (the “Commission”) direct PECO to incorporate a “more complete analysis” of the potential for undergrounding vulnerable facilities in LTIIIP III, incorporating the costs and benefits of the disruption of such facilities and the expense of replacing or upgrading them, including an analysis of the Value of Lost Load. The OCA also

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encourages PECO to engage in an undergrounding analysis whenever faced with distribution components that have failed multiple times as the result of storm or high wind activity.

PECO appreciates the OCA's Comments and wants to clarify that PECO already recognizes and considers the potential reliability benefits of undergrounding and targeted undergrounding solutions in its overall distribution system planning and capital improvement projects. PECO thoroughly analyzes distribution components with higher risk profiles and determines the optimal engineering solutions (including undergrounding) that will deliver cost-effective reliability and resilience improvements. Factors considered in the analysis include customer impacts, facility location, and field conditions to ensure comprehensive and effective outcomes.

When deciding whether to deploy undergrounding solutions, PECO considers easements and Rights of Way ("ROW") requirements and cost per avoided customer interrupted ("ACI"). For easements and ROW, undergrounding often requires replacing overhead transformers with pad mounted transformers, which must be located on private property. This can pose a challenge if property owners are unwilling to grant PECO rights to install the equipment. For ACI, undergrounding is often significantly more expensive than other engineering solutions.

Undergrounding can also pose significant engineering challenges due to the differences in protective strategies and equipment for underground and overhead distribution systems. PECO is currently piloting underground equipment ("Integrated Switchgear") in specific circumstances on a pad or in a manhole. This is an electrical system that includes the primary switchgear, like a breaker or switch, and its associated secondary control and protection systems. We are also learning about the capabilities and limitations of system automation in pad mounted and manhole environments from our Exelon peers and equipment providers.

Consideration of undergrounding is already part of the Customers Experiencing Multiple Interruptions ("CEMI") program and PECO is currently piloting projects to gather data to facilitate additional informed undergrounding decisions that will produce the best long-term results for customers. For example, PECO is planning to execute undergrounding projects in the next year in our baseline program, in areas identified as "Worst Performing Vegetation Sections." These projects will involve replacing aerial open wire with underground cable and replace aerial transformers with pad mounted transformers, which is expected to reduce the frequency of outages caused by vegetation in these areas. PECO will share the evolution, progress and analysis of these projects with the OCA, including the costs, benefits, challenges, risks, mitigations and customer impacts.

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As evidenced by the enclosed Certificate of Service, copies of these Reply Comments are being served upon the Bureau 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 856.912.4738.

Respectfully submitted,



Jack R. Garfinkle

Enclosure

**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 the **Reply Comments of PECO Energy Company** 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 13, 2025

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