

Morgan Lewis

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January 21, 2026

VIA ELECTRONIC FILING

Matthew L. 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 220-39 Line and 220-97 Line Located in Marcus Hook Borough and Lower Chichester Township, Delaware County, Pennsylvania Docket No. A-2026-_____

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 construct two new transmission structures related to the 220-39 Line and 220-97 Line between the Chichester Substation and the Linwood Substation, within Marcus Hook Borough and Lower Chichester Township, Delaware County, Pennsylvania, to increase reliability. 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 of the Letter of Notification on or before the June 18, 2026 Public Meeting in order to allow construction to commence in September 2026.

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.

Morgan, Lewis & Bockius LLP

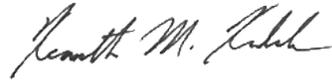
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Matthew L. Homsher
January 21, 2026
Page 2

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-2026-_____
Construction of the 220-39 Line and 220-97 :
Line Located in Marcus Hook Borough and :
Lower Chichester Township, Delaware :
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 construct two new transmission structures for the 220-39 Line and 220-97 Line (hereinafter, the “Project”) between the Chichester Substation and the Linwood Substation within Marcus Hook Borough and Lower Chichester Township, Delaware County, Pennsylvania, to increase reliability. 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 June 18, 2026 Public Meeting in order to allow construction to commence in September 2026.

In support of the approval requested herein, 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

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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 existing in-line insulators that electrically separate the existing 220-39 Line and 220-97 Line with two new dead-end transmission structures, increasing the reliability of both lines as well as the 230 kV substation currently powered by the 220-39 Line and the 220-97 Line (the "Post Substation"). Currently, any capital or non-emergent maintenance work required for

the 220-39 Line and 220-97 Line in-line insulators or the adjacent existing transmission structures W-287A and W-287 requires an outage on both the 220-97 Line and 220-39 Line unless work can be performed safely using specialized transmission live-line contractors. However, for emergent maintenance work for the 220-39 Line and 220-97 Line in-line insulators or the adjacent existing transmission structures W-287A and W-287, an outage of both lines (if they are still energized) would most likely be the only available option as transmission live-line workers are not generally available on an emergent basis.¹ If both lines are taken out of service, there would be a significant impact as the Post Substation powered by these lines would be unable to serve all its customers, including several large commercial customers.² Replacing the in-line insulators with two new dead-end transmission structures to separate the lines will eliminate these reliability issues.

6. The estimated cost to design and construct the Project is approximately \$2.0 million. Of that cost, \$940,000 is attributed to materials (new conductor/hardware, static wire, transmission structures, foundations, and appurtenances). The remaining \$1,060,000 is attributable to direct labor—primarily engineering and design, clearance reviews, and electrical/civil construction—and allocated PECO overhead and management costs. As the owner of the 220-39 Line and 220-97 Line, PECO will finance and build the proposed Project.

7. The \$2.0 million in projected costs are all transmission 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

¹ Transmission live-line contractors are highly specialized line workers with advanced training. PECO does not currently have any employees capable of performing transmission live-line work. As a result, PECO, like many electric utilities, contracts transmission live-line workers as needed. Due to the relatively small number of transmission live-line contractors available to be contracted, PECO typically can only contract transmission live-line workers in advance for planned outages. It is highly unlikely that transmission live-line contractors would be available for emergent work such as in the event of an unplanned outage on both the 220-97 Line and 220-39 Line.

² Both lines could be taken out of service from events including but not limited to equipment failure, natural disaster, or a derailment on the adjacent Amtrak line.

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.

8. The Project has a scheduled construction start date in September 2026 to meet an in-service date of November 20, 2026. The Project requires two transmission outages. The outage for the reconductoring (structure erection and wire transfer) work is currently scheduled for November 7, 2026, to November 13, 2026, for the 220-39 Line and November 14, 2026, to November 20, 2026, for the 220-97 Line.

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

- Attachment 1 – Plan & Profile Drawings
- Attachment 2 – Letter of Notification Filing Checklist

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

II. THE PROJECT

A. Need for the Project

11. The 220-39 Line (Chichester Substation to Edgemoor Substation) was originally constructed in 1971. In 2001, PECO added the Linwood Substation, which required PECO to cut the line in two in order to provide dual 230 kV feeds to the substation. The Chichester Substation to Linwood Substation line segment retained the 220-39 Line designation. In 2018, PECO added the Post Substation and cut the 220-39 Line in order to provide dual 230 kV feeds to also power the Post Substation. The Chichester Substation to the Post Substation line segment retained the

220-39 Line designation, and the Post Substation to the Linwood Substation line segment was renamed as the 220-97 Line.

12. The need for the Project is related to the interconnection between the 220-39 Line and the 220-97 Line. The 220-39 Line and 220-97 Line are electrically separated using six in-line insulators. The existing 220-39 Line is 2.3 miles long with 39 structures and the existing 220-97 Line is 0.8 miles long with 18 structures. The current line arrangements pose several reliability and maintenance challenges. Equipment failure of any one of the six in-line insulators, insulator assemblies or conductors between existing transmission structures W-287A and W-287 will cause a dual outage on the 220-39 Line and 220-97 Line and a total loss of power at the Post Substation. Specifically, any unplanned maintenance or emergent repair work on any of the six in-line insulators or the adjacent existing transmission structures W-287A and W-287 requires an outage on both the 220-39 Line and 220-97 Line, except in the unlikely event that the work can be performed safely using specialized transmission live-line contractors (who are not generally available on an emergent basis). The Project proposed by PECO will replace the in-line insulators with two new dead-end structures to eliminate this issue, increasing reliability by eliminating the dual outage risk and allowing PECO to perform maintenance and emergent work on one line without affecting the other line.

13. In addition, the new dead-end transmission structures will increase the reliability of the 230 kV Post Substation, which is currently powered from the 220-39 Line and the 220-97 Line. As explained above, emergent maintenance activities required for the 220-39 Line or the 220-97 Line in-line insulators or the existing transmission structures W-287A and W-287 require that both the 220-97 Line and 220-39 Line be taken offline if they are still energized, except in the unlikely event that the work can be performed safely using specialized transmission live-line contractors

(who are not generally available on an emergent basis). With both lines offline, the Post Substation and all customers served by the Post Substation, including several large commercial customers, would be without power. Among the customers is Energy Transfer LP (“Energy Transfer”) that owns the Marcus Hook Terminal, a major hub for natural gas liquids. Due to the large load demand of Energy Transfer, there is no feasible option, including mobile generation, to supply power to the Marcus Hook Terminal during an outage of the Post Substation. Replacing the in-line insulators with new dead-end structures to separate the circuits will thus also enhance the reliability of the Post Substation.

B. Description of the Proposed Project

14. The Project involves replacing the existing in-line insulators that electrically separate the 220-39 Line from the 220-97 Line with two new 230 kV dead-end transmission structures between existing transmission structures W-287A and W-287 in Marcus Hook Borough and Lower Chichester Township, Pennsylvania. One of the new transmission structures will be part of the 220-39 Line, and the other new transmission structure will be part of the 220-97 Line. *See* Attachment 1 for the approximate height and location of the new transmission structures on each line.

15. The new transmission structures will be steel tubular H-frames located along the current pathway for the existing 220-39 Line and 220-97 Line. The new transmission structures will be approximately 73 feet tall and lower than the nearby existing transmission structures for the 220-39 Line and 220-97 Line which are approximately 90 to 95 feet tall. The Project will not change the existing transmission structures or conductors of the 220-39 Line and 220-97 Line. No rating changes are proposed for this Project. The existing conductors for the 220-39 Line and 220-97 Line are 2x1590 kcmil 54/19 ASCR conductors. The new jumpers that will be added at the two

new dead end structures will match the existing conductors. The Project will be constructed entirely within existing PECO right-of-way that is approximately 150 feet wide at the Project area.

16. The Project does not include the removal of existing transmission structures. PECO anticipates the service life of the new transmission structures and appurtenances to be over 60 years.

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

III. HEALTH AND SAFETY

18. 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.

19. 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

20. As explained above, the 220-39 Line is 2.3 miles long, running from the Chichester Substation to the Post Substation, and the 220-97 Line is 0.8 miles long, running from the Post Substation to the Linwood Substation within Marcus Hook Borough and Lower Chichester Township, Pennsylvania. One new transmission structure will be installed as part of the 220-39 Line and the other new transmission structure will be installed as part of the 220-97 Line. All construction of the proposed Project will take place within PECO's existing rights-of-way, and no additional properties or easements are required for this Project. Therefore, PECO anticipates that the Project will have a minimal incremental impact on land use in the Project area.

21. The closest airport to the Project area is the Philadelphia International Airport, which is located approximately 8.6 miles from the Post Substation. 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.

22. The Project will not traverse or affect any unique geological or scenic areas.

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

24. The Project will not cross any streams or wetlands and a Pennsylvania Natural Diversity Inventory is not required. PECO does not anticipate any adverse impacts to the environment. Erosion and sediment control devices and best management practices will be in place to prevent sedimentation and impacts due to the two new transmission structures. No permit is required for the Project for the small disturbance area.

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

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), 57.72(d)(1)(v) and, 57.72(d)(1)(vi).

29. The proposed Project qualifies for use of a Letter of Notification because the Project will be located entirely within PECO's existing right-of-way. The Project also qualified for use of a Letter of Notification because the Projected is a limited reconstruction of two existing transmission lines and will not substantially alter the existing right-of-way. In addition, the proposed Project qualifies for use of a Letter of Notification because the proposed Project work will occur within an approximately 0.04 mile line between the locations of the two new transmission structures.

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

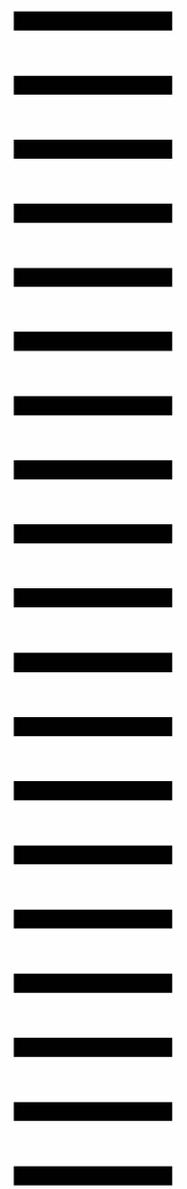
WHEREFORE, PECO respectfully requests the Commission grant approval to construct two transmission structures for the existing 220-39 Line and 220-97 Line between the Chichester Substation and the Linwood Substation within Marcus Hook Borough and Lower Chichester Township, Delaware County, Pennsylvania. PECO respectfully requests review and approval of the Letter of Notification by the Commission on or before the June 18, 2026 Public Meeting in order to allow construction to commence in September 2026.

Respectfully submitted,



Kenneth M. Kulak
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2222 Market Street
Philadelphia, PA 19103-3007
(215) 963-5384
ken.kulak@morganlewis.com

Dated: January 21, 2026



PECO POST SUBSTATION TAP LOCATION DEAD-END STRUCTURES

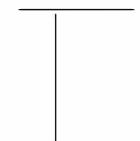
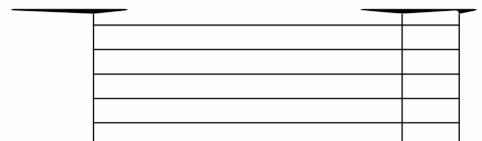
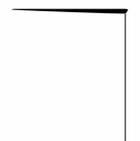
PECO CIRCUITS 220-39 & 220-97 TRANSMISSION MODIFICATIONS

100% SUBMISSION
09/04/2025



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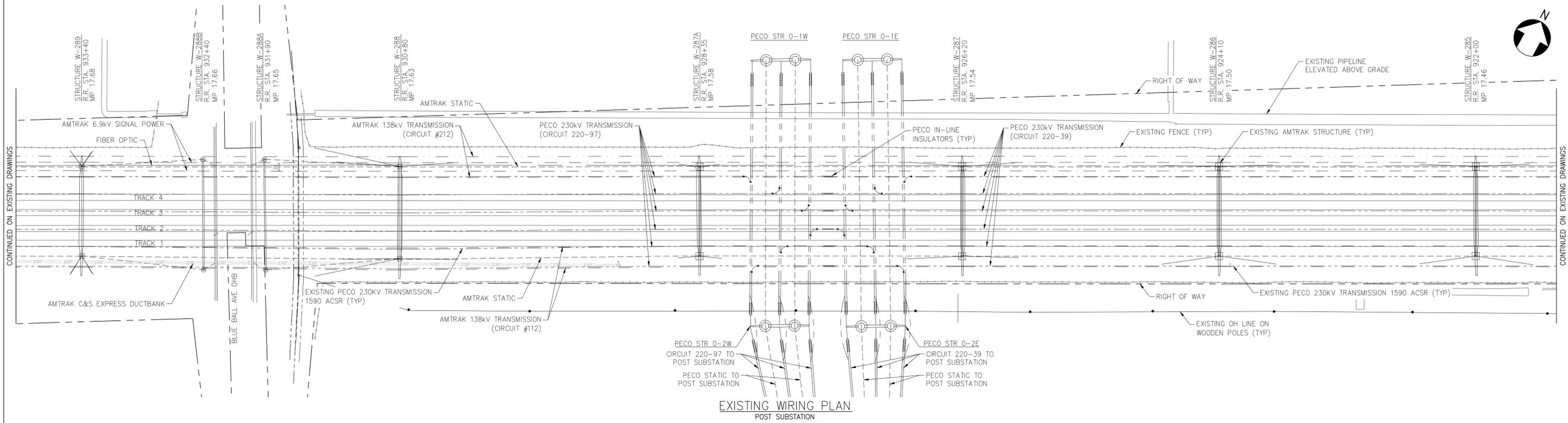
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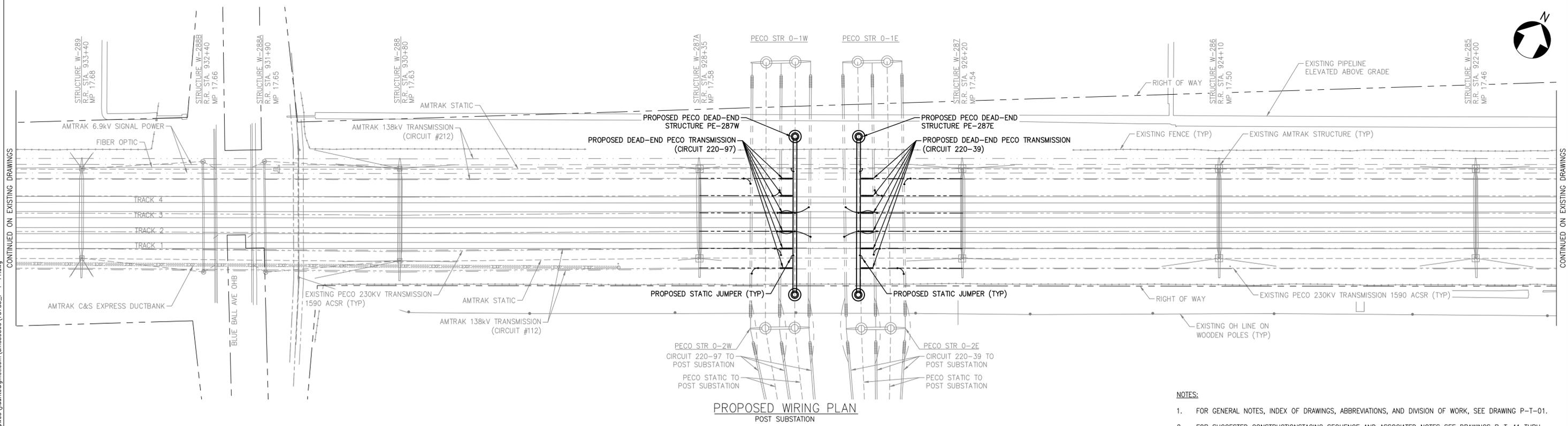
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Designed:	DL	Drawn:	DFJ
Checked:	M	Date:	09/04/2025

TO WILMINGTON

TO PHILADELPHIA

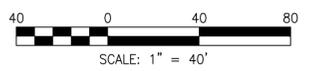


EXISTING WIRING PLAN
POST SUBSTATION



PROPOSED WIRING PLAN
POST SUBSTATION

- NOTES:
- FOR GENERAL NOTES, INDEX OF DRAWINGS, ABBREVIATIONS, AND DIVISION OF WORK, SEE DRAWING P-T-01.
 - FOR SUGGESTED CONSTRUCTION STAGING SEQUENCE AND ASSOCIATED NOTES SEE DRAWINGS P-T-41 THRU P-T-43.



No.	Revisions	Date	By



PECO POST SUBSTATION TAP LOCATION
DEAD-END STRUCTURES
EXISTING AND PROPOSED WIRING PLAN

Designed: JDL Drawn: BPJ Checked: SJM Date: 09/04/2025

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Sheet No.	2 OF 4
Dwg. No.	P-T-11

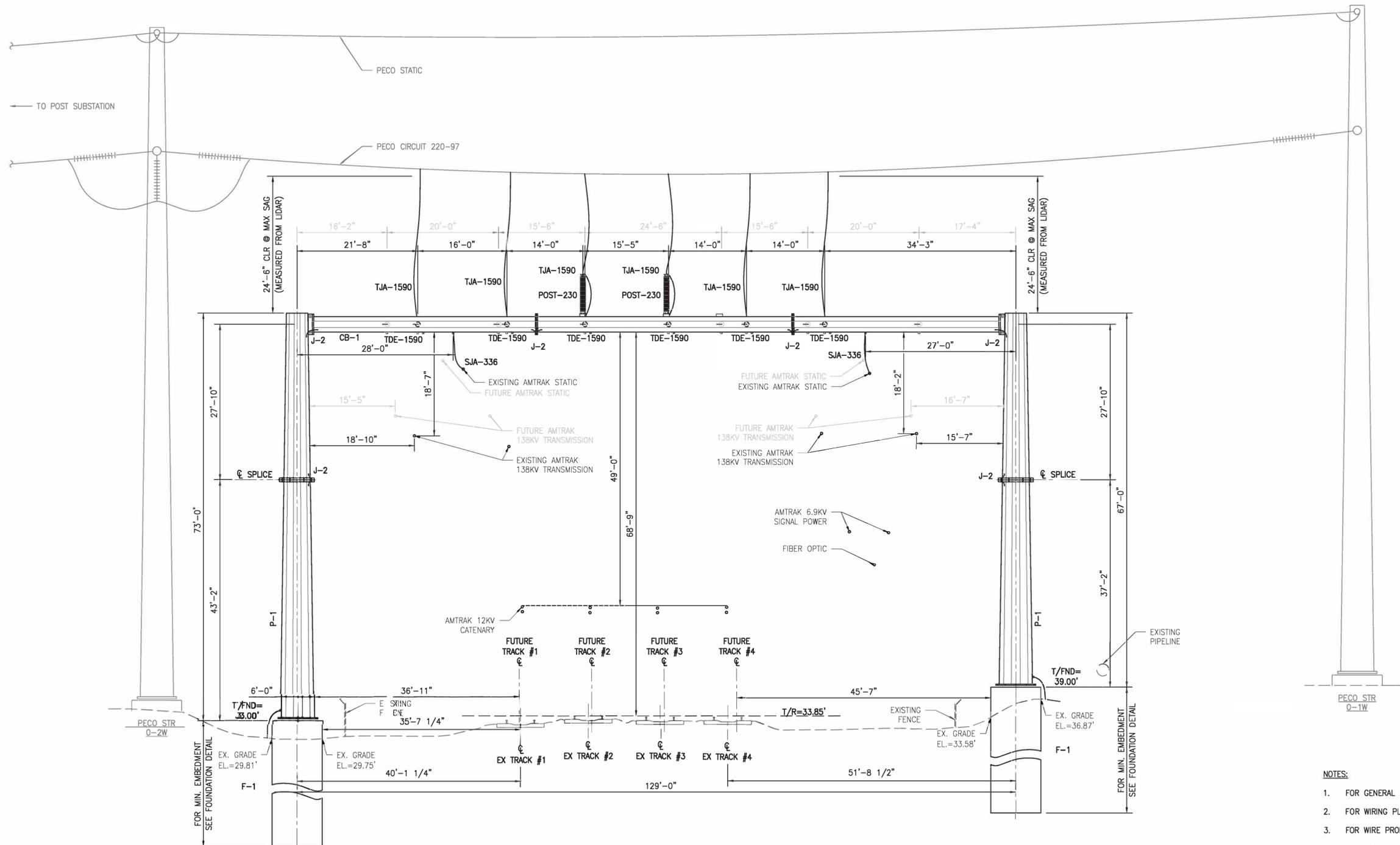
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WORK STATEMENT

1. INSTALL FOUNDATIONS.
2. INSTALL POLES.
3. INSTALL CROSS BEAM AND JUMPER TO AMTRAK STATIC WIRE.
4. INSTALL DEAD-ENDS TO TRANSFER PECO CONDUCTORS AND INSTALL JUMPER ASSEMBLIES AS SHOWN, SUGGESTED STAGING SHOWN ON DWGS P-T-41 THRU P-T-43.

BILL OF MATERIAL

MARK	DESCRIPTION	REFERENCE DRAWING	QTY
F-1	FOUNDATION ASSEMBLY	P-T-51	2
P-1	POLE ASSEMBLY	P-T-52	2
CB-1	CROSS BEAM ASSEMBLY	P-T-53	1
TDE-1590	TRANSMISSION DEAD END ASSEMBLY	P-T-61	6
TJA-1590	TRANSMISSION JUMPER ASSEMBLY	P-T-61	6
POST-230	POST INSULATOR	P-T-61	2
J-2	POLE JUMPER	P-T-62	6
SJA-336	STATIC JUMPER ASSEMBLY	P-T-62	1



STRUCTURE PE-287W (NEW)

STA. No. 927+57
M.P. 17.57
LOOKING TOWARD WILMINGTON

NOTES:

1. FOR GENERAL NOTES, INDEX OF DRAWINGS, ABBREVIATIONS, AND DIVISION OF WORK, SEE DRAWING P-T-01.
2. FOR WIRING PLANS SEE DRAWINGS P-T-11 & P-T-12.
3. FOR WIRE PROFILES SEE DRAWINGS P-T-21 THRU P-T-23.
4. MONOPOLE FABRICATOR TO PROVIDE CONNECTION DETAILS FOR CONDUCTOR INSTALLATION IN FUTURE CONDITION AS DIMENSIONED IN GRAY.
5. CONTRACTOR TO SURVEY AND CONFIRM WIRE ELEVATIONS AND OFFSETS PRIOR TO FABRICATION.

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No.	Revisions	Date	By



**PECO POST SUBSTATION TAP LOCATION
DEAD-END STRUCTURES
ERECTION DIAGRAM - STRUCTURE PE-287W**

Designed: JDL Drawn: BPJ Checked: SJM Date: 09/04/2025

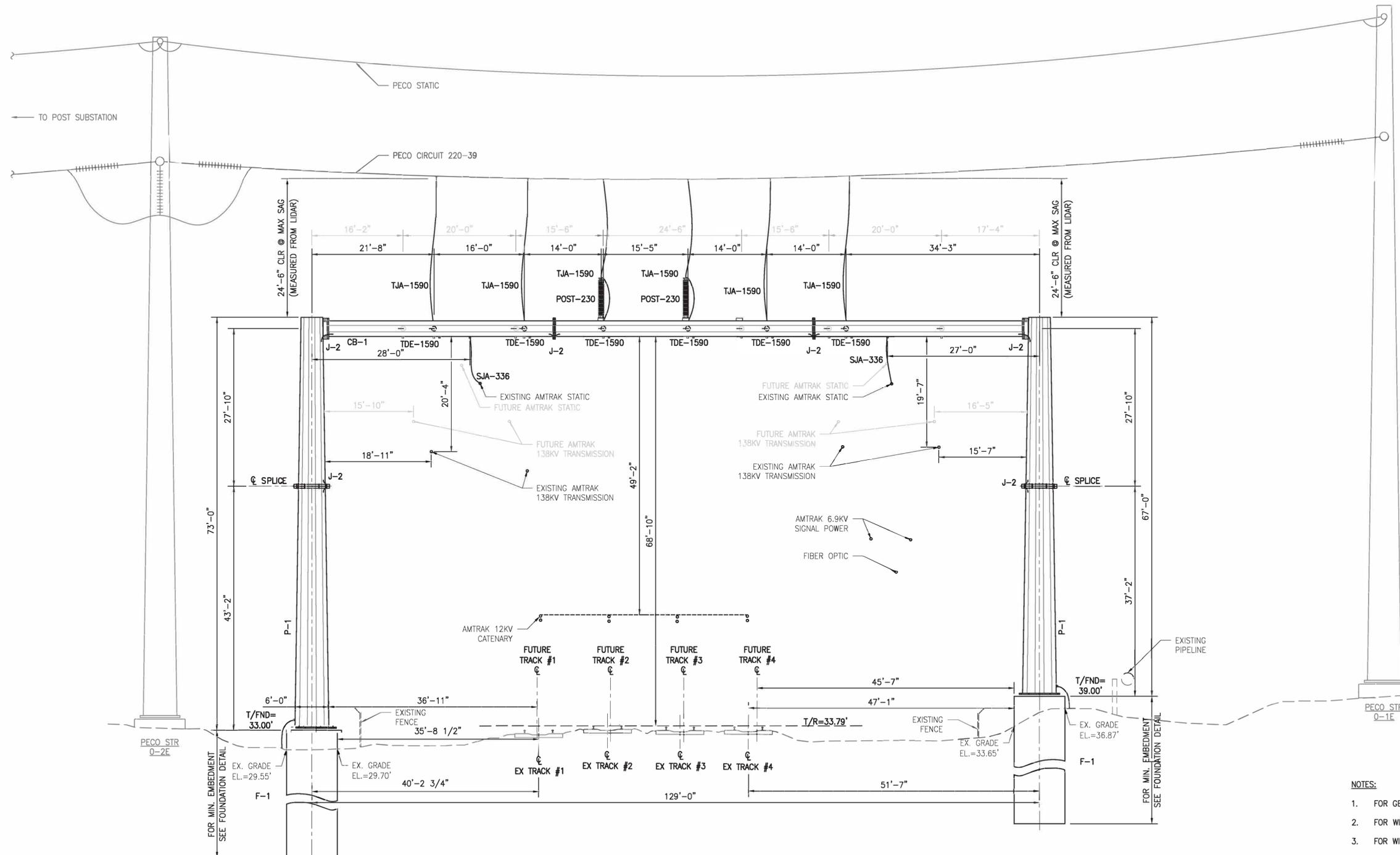
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WORK STATEMENT

1. INSTALL FOUNDATIONS.
2. INSTALL POLES.
3. INSTALL CROSS BEAM AND JUMPER TO AMTRAK STATIC WIRE.
4. INSTALL DEAD-ENDS TO TRANSFER PECO CONDUCTORS AND INSTALL JUMPER ASSEMBLIES AS SHOWN, SUGGESTED STAGING SHOWN ON DWGS P-T-41 THRU P-T-43.

BILL OF MATERIAL

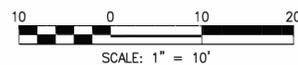
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P-1	POLE ASSEMBLY	P-T-52	2
CB-1	CROSS BEAM ASSEMBLY	P-T-53	1
TDE-1590	TRANSMISSION DEAD END ASSEMBLY	P-T-61	6
TJA-1590	TRANSMISSION JUMPER ASSEMBLY	P-T-61	6
POST-230	POST INSULATOR	P-T-61	2
J-2	POLE JUMPER	P-T-62	6
SJA-336	STATIC JUMPER ASSEMBLY	P-T-62	1



- NOTES:**
1. FOR GENERAL NOTES, INDEX OF DRAWINGS, ABBREVIATIONS, AND DIVISION OF WORK, SEE DRAWING P-T-01.
 2. FOR WIRING PLANS SEE DRAWINGS P-T-11 & P-T-12.
 3. FOR WIRE PROFILES SEE DRAWINGS P-T-21 THRU P-T-23.
 4. MONOPOLE FABRICATOR TO PROVIDE CONNECTION DETAILS AND CROSS ARMS FOR FUTURE INSTALLATION, SHOWN AS SCREENED LINEWORK. SEE GENERAL NOTES ON DRAWING P-T-01 FOR ADDITIONAL INFORMATION.
 5. CONTRACTOR TO SURVEY AND CONFIRM WIRE ELEVATIONS AND OFFSETS PRIOR TO FABRICATION.

STRUCTURE PE-287E (NEW)

STA. No. 927+05
M.P. 17.56
LOOKING TOWARD WILMINGTON



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No.	Revisions	Date	By



**PECO POST SUBSTATION TAP LOCATION
DEAD-END STRUCTURES
ERECTION DIAGRAM - STRUCTURE PE-287E**

Designed: JDL Drawn: BPJ Checked: SJM Date: 09/04/2025

File No: -
Design No: -
Sheet No: **4 of 4**
Dwg. No: **P-T-34**

Letter of Notification Filing Checklist
PECO 220-39 and 220-97 Lines

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
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anthony.gay@exeloncorp.com

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 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)-(iv) the applicant believes are applicable.

PECO proposes to construct two new 230 kV dead-end transmission structures in Marcus Hook Borough and Lower Chichester Township, Delaware County, Pennsylvania, between existing transmission structures W-287A and W-287 of the existing 220-39 Line and 220-97 Line to increase reliability (the "Project"). One of the new transmission

structures will be part of the 220-39 Line, and the other new transmission structure will be part of the 220-97 Line. See Attachment 1 for the approximate height and location of the new transmission structures on each line.

The new transmission structures will be steel tubular H-frames located along the current pathway for the existing 220-39 Line and 220-97 Line. The new transmission structures will be approximately 73 feet tall and lower than the nearby existing transmission structures for the 220-39 Line and 220-97 Line which are approximately 90 to 95 feet tall. The Project will not change the existing transmission structures or conductors of the 220-39 Line and 220-97 Line. No rating changes are proposed for this Project. The existing conductors for the 220-39 Line and 220-97 Line are 2x1590 kcmil 54/19 ASCR conductors. The new jumpers that will be added at the two new dead-end structures will match the existing conductors. The Project will be constructed entirely within existing PECO right-of-way that is approximately 150 feet wide at the Project area.

This application is made pursuant to three 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 right-of-way.
- 52 Pa. Code §57.72(d)(1)(v): A 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 partially 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.
- 52 Pa. Code §57.72(d)(1)(vi): An HV line having a proposed route of 2 miles or less. The Project meets this criterion because PECO proposes reconstructing approximately 0.04 miles.

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.

The existing 220-39 and 220-97 circuits are operated at 230 kV and are part of the national bulk electric system. The 220-39 Line (Chichester Substation to Edgemoor Substation) was originally constructed in 1971. In 2001, PECO added the Linwood Substation, which required PECO to cut the line in two in order to provide dual 230 kV feeds to the substation. The Chichester Substation to Linwood Substation segment of the line retained the 220-39 Line designation and the Linwood Substation to Edgemoor

Substation segment was renamed to the 220-84 Line. In 2018, PECO added the Post Substation and cut the 220-39 Line in order to provide dual 230 kV feeds to also power the Post Substation. The Chichester Substation to Post Substation line segment retained the 220-39 Line designation and the Post Substation to Linwood Substation line segment was renamed the 220-97 Line.

The 220-39 Line and 220-97 Line are electrically separated using six in-line insulators. The existing 220-39 Line is 2.3 miles long with 39 structures and the existing 220-97 Line is 0.8 miles long with 18 structures. The current line arrangements pose several reliability and maintenance challenges. Equipment failure of any one of the six in-line insulators, insulator assemblies or conductors between existing transmission structures W-287A and W-287 will cause a dual outage on the 220-39 Line and 220-97 Line and a total loss of power at the Post Substation. Currently, any capital or non-emergent maintenance work required for the 220-39 Line and 220-97 Line in-line insulators or the adjacent existing transmission structures W-287A and W-287 requires an outage on both the 220-97 Line and 220-39 Line unless work can be performed safely using specialized transmission live-line contractors. However, for emergent maintenance work for the 220-39 Line and 220-97 Line in-line insulators or the adjacent existing transmission structures W-287A and W-287, an outage of both lines (if they are still energized) would most likely be the only available option as transmission live-line workers are not generally available on an emergent basis.¹ PECO's proposed Project will replace the in-line insulators with two new dead-end structures to eliminate this issue, increasing reliability by eliminating the dual outage risk and allowing PECO to perform maintenance and emergent work on one line without affecting the other line.

In addition, the new dead-end transmission structures will increase the reliability of the 230 kV Post Substation, which is currently powered from the 220-39 Line and the 220-97 Line. As explained above, for emergent maintenance work activities required for the 220-39 Line or the 220-97 Line in-line insulators or the existing transmission structures W-287A and W-287, an outage of both the 220-97 Line and 220-39 Line (if they are still energized) would most likely be the only available option as live workers are not generally available on an emergent basis. With both lines offline, there would be a significant impact as the Post Substation and all customers served by the Post Substation, including several large/commercial customers, would be without power.² Among the customers is Energy Transfer LP ("Energy Transfer") that owns the Marcus Hook Terminal, a major hub for natural gas liquids. Due to the large load demand of Energy Transfer, there is no feasible option, including mobile generation, to supply power to the Marcus Hook Terminal during an outage of the Post Substation. Replacing the in-line

¹ Transmission live-line contractors are highly specialized line workers with advanced training. PECO does not currently have any employees capable of performing transmission live-line work. As a result, PECO, like many electric utilities, contracts transmission live-line workers as needed. Due to the relatively small number of transmission live-line contractors available to be contracted, PECO typically can only contract transmission live-line workers in advance for planned outages. It is highly unlikely that transmission live-line contractors would be available for emergent work such as in the event of an unplanned outage on both the 220-97 Line and 220-39 Line.

² Both lines could be taken out of service from events including but not limited to equipment failure, natural disaster, or a derailment on the adjacent Amtrak line.

insulators with new dead-end structures to separate the circuits will thus also enhance the reliability of the Post Substation.

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 approximate height and locations of the new transmission structures are listed in the table below.

New Structure Number	Existing Line	Height (ft)	Location compared to existing structure
PE-287E	220-39	73	Approximately 80 feet west of existing transmission structure W-287.
PE-287W	220-97	71	Approximately 137 feet west of existing transmission structure W-287.

- 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.**

Not Applicable. 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.**

Not applicable. The Project will not affect transmission flows and does not involve PJM potential planning criteria. Therefore, the Project is not subject to PJM review or approval. This Project is also not part of a larger project.

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

PECO estimates the Project cost to be \$2,000,000. \$940,000 of that total is attributable to materials (new conductor/hardware, static wire, transmission structures, foundations, and appurtenances). The remaining \$1,060,000 is attributable to direct labor—primarily engineering and design, clearance reviews, and electrical/civil construction—and allocated PECO overhead and management costs. As the owner of the 220-39 Line and 220-97 Line, PECO will finance and build the proposed project.

The \$2.0 million in projected costs are all transmission 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.

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 September 2026 for pouring concrete foundations. The remainder of the Project requires taking two transmission outages, currently scheduled for November 7, 2026, to November 13, 2026, for the 220-39 Line, and November 14, 2026, to November 20, 2026, for the 220-97 Line. The proposed in-service date of the Project is November 20, 2026.

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 installing two new dead-end transmission structures entirely within existing right-of-way as described in the response to Question 3. No other changes are proposed as part of this Project. The conductors will remain in a similar location as they current exist.

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.

PECO's Letter of Notification filing is being made today, January 21, 2026. 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.

Not applicable. The Project will not cross any streams or wetlands and a Pennsylvania Natural Diversity Inventory is not required. PECO does not anticipate any adverse impacts to the environment. Erosion and sediment control devices and best management practices will be in place to prevent sedimentation and impacts due to the two new transmission structures. No permit is required for the Project for the small disturbance area.

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.

This Project involves the construction of one new tubular dead-end H-frame structure on the existing 220-39 circuit and one new tubular dead-end H-frame structure on the existing 220-97 circuit.

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.

Not Applicable. *See* PECO's response to Question 8. The Project will not affect transmission flows and is thus not subject to PJM minimum planning criteria.

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. The Project is not driven by load growth.

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).

Not applicable. The Project is not driven by aged equipment or the health of the existing transmission line facilities, and no existing transmission structures will be replaced during the Project. Two new transmission structures will be constructed as part of the Project, and the service life of the new transmission structures and appurtenances is expected to be more than 60 years.

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 was one unplanned outage on the 220-39 Line in the prior 10 years. On January 25, 2015, the 220-39 circuit tripped due to a switching error at Linwood Substation. There was also one unplanned outage on the 220-97 Line in the prior 10 years. On May 6, 2016, the 220-97 circuit tripped due to incorrect blocking of the 220-87 test switches at the Phillips Island generation facility. However, no customers lost service during these outages because in each instance, the Post Substation was powered by at least one transmission line, and the PJM transmission system absorbed the outages and continued to operate without interruption. Unlike the scenario described in Question 4 above, where both lines would need to be deenergized for emergent maintenance work, in the prior unplanned outages at least one line was still able to feed the substation, providing power for customers.

The Project would not mitigate the effects of the outages described above; however, the Project would mitigate an outage of the Post Substation in the event that both lines tripped or emergent maintenance or repair work is required on the in-line insulators or adjacent existing transmission structures W-287A and W-287.

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.

At a high-level, PECO preliminarily considered two alternative solutions that were summarily dismissed as not feasible. First, PECO considered whether mobile generation

could be used to supply customers normally powered by the Post Substation in the event the substation lost power. However, the load of the customers is significantly greater than the output of a mobile generator, and because PECO would require a prohibitive number of mobile generation units, this alternative is not practicable. Second, PECO considered tapping into the next closest transmission lines to provide an additional feed to the Post Substation, but this option would be much more technically complex and expensive than the proposed Project. PECO did not conduct formal evaluations of these potential alternative solutions.

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

The 220-39 Line and 220-97 Line are integrated parts of the PJM transmission system and thus do 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.

The in-line insulators electrically separate the 220-39 Line from the 220-97 Line. The 220-39 Line and 220-97 Line have not experienced any outages related to the in-line insulators and therefore, while the consequences of a dual outage are high, PECO is unable to quantify the anticipated increase in reliability. Nonetheless, the Project will increase reliability because in the current configuration of the 220-39 Line from the 220-97 Line, for emergent maintenance work for the in-line insulators or the adjacent existing transmission structures W-287A and W-287, an outage of both lines (if they are still energized) would most likely be the only available option as transmission live-line workers are not generally available on an emergent basis.

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.

Not applicable.

**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-2026-_____**
**Construction of the 220-39 Line and 220-97 :
Line Located in Marcus Hook Borough and :
Lower Chichester Township, Delaware :
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: 01/13/2026

DT Davis
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-2026-_____**
**Construction of the 220-39 Line and 220-97 :
Line Located in Marcus Hook Borough and :
Lower Chichester Township, Delaware :
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.

Pennsylvania Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923
ra-oca@paoca.org

Allison C. Kaster
Bureau of Investigation and Enforcement
Pennsylvania 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

Delaware County Council
Government Center
Room 202
201 W. Front Street
Media, PA 19063
Attn: Richard R. Womack, Chair

Delaware County Planning Commission
2 W. Baltimore Avenue
Suite 202
Media, PA 19063
Attn: John Gillespie, P.E., Chairman

Lee Awbrey
Delaware County Solicitor
Government Center, 2nd Floor
201 W. Front Street
Media, PA 19063

Mark P. Much
Marcus Hook Borough Solicitor
1111 Market Street
Marcus Hook, PA 19061

Francis J. Catania
Lower Chichester Township Solicitor
1410 Market Street
P.O. Box 1255
Linwood, PA 19061

Marcus Hook Borough
1111 Market Street
Marcus Hook, PA 19061
Attn: Cheryl J. Evernham, President

Lower Chichester Township
1410 Market Street
P.O. Box 1255
Linwood, PA 19061
Attn: Rocco Gaspari, Jr., President

Pennsylvania 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

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

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

Pennsylvania 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

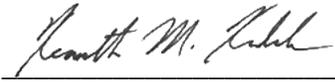
Pennsylvania Fish and Boat Commission
Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823-9620
Attn: Christopher A. Urban, Chief

Pennsylvania 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

Dated: January 21, 2026



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