

Morgan Lewis

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January 30, 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 Conowingo 220-69 Line Project Located in Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania
Docket No. A-2025-3057875**

Dear Secretary Homsher:

Enclosed for filing on behalf of PECO Energy Company (“PECO”) is an Amendment to the Letter of Notification (“LON”) filed on October 7, 2025, in the above-captioned docket. The LON requested Commission approval to rebuild the existing transmission line and other structures related to the Conowingo 220-69 Line Project from Plymouth Meeting Substation to Upper Merion Substation, within Plymouth Township and Upper Merion Township, Montgomery County, Pennsylvania that are at the end of life (the “Project”).

This Amendment pertains to the LON and Attachment 2 of the LON. PECO is providing clean and redline pages of both documents showing the changes as Appendices 1 through 4. The changes shown reflect PECO’s withdrawal from an agreement with the Department of Energy (DOE) for which DOE would have reimbursed some of PECO’s costs for the Project. PECO’s decision to withdraw from the agreement is intended to ensure responsible resource allocation and maintain operational reliability while continuing to advance grid modernization and cleaner energy initiatives through other channels.

PECO respectfully requests Commission review and approval of the LON on or before the February 19, 2026 Public Meeting in order to allow construction of the Project to commence shortly thereafter.

As indicated on the enclosed Certificate of Service, copies of this Amendment have been served to the Bureau of Information and Enforcement, the Bureau of Technical Utility Services, the Office of Consumer Advocate, and the Office of Small Business Advocate.

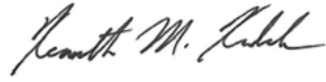
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If you have any questions, please call me directly at 215.963.5384.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kenneth M. Kulak". The signature is written in a cursive style with a large initial 'K'.

Kenneth M. Kulak

Enclosure

c: 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 :
Construction of the Conowingo 220-69 Line : **Docket No. A-2025-3057875**
Located in Plymouth Township and Upper :
Merion Township, Montgomery County, :
Pennsylvania :

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the **Amendment of PECO Energy Company to 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

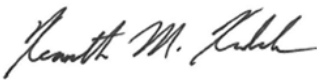
Darryl A. Lawrence
Office of Consumer Advocate
555 Walnut Street
Forum Place – 5th Floor
Harrisburg, PA 17101-1921
dlawrence@paoca.org

Allison C. Kaster
Bureau of Investigation and Enforcement
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
akaster@pa.gov

Jordan Van Order
Bureau of Technical Utility Services
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
jvanorder@pa.gov

NazAarah Sabree
Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov

Dated: January 30, 2026



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Appendix 1
Letter Of Notification (Clean)

to direct labor—primary engineering and design, clearance reviews, and electrical/civil construction—and allocated to PECO overhead and management costs. PECO will own, finance, and build the proposed Project.

7. The Project has a scheduled construction start date in February 2026 to meet an in-service date of December 30, 2027. The Project requires a transmission outage. The outage for the reconductoring work is currently scheduled for September 13, 2027, to December 10, 2027.

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

- Attachment 1 – Plan & Profile Drawings¹
- Attachment 2 – Letter of Notification Filing Checklist
- Attachment 3 – CEII/CONFIDENTIAL Line Ratings

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

II. THE PROJECT

A. Need for the Project

10. Much of the existing 220-69 Line was constructed in the 1920s and thus the structures, foundations, and conductors are all nearing 100 years of service and are at end of life. The need for the Project is related to the condition and age of the 220-69 Line. The Project will support the reliability of PECO’s transmission system by removing and replacing the aging infrastructure.

¹ The Plan & Profile Drawings refer to “Phase 1”, which is the Conowingo 220-47 Line approved in Docket No. A-2024-3052612, and “Phase 2”, which is the Conowingo 220-69 Line (i.e., the Project).

Appendix 2
Letter Of Notification (Redline)

to direct labor—primary engineering and design, clearance reviews, and electrical/civil construction—and allocated to PECO overhead and management costs. PECO will own, finance, and build the proposed Project. ~~The Department of Energy will reimburse \$7 million of the above cost utilizing funding from the Infrastructure Investment and Jobs Act. The Department of Energy has partially reimbursed PECO on a monthly basis totaling \$169,337, with the last reimbursement received on May 30, 2025.~~

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**Appendix 3
Attachment 2: Checklist (Clean)**



M-3 Process PECO Transmission Zone
220-69 Plymouth Meeting – Upper Merion 230 kV Line Rebuild

Need Number: PE-2022-010
Process Stage: Solution Meeting 10/31/23

- Proposed Solution:**
- Rebuild approx. 4.5 miles with new dual circuit, weathering steel monopole structures and 959.6 kcmil ACS5 conductor.
 - Replace various substation equipment at Plymouth Meeting and Upper Merion substations to make the conductor the limiting element.

Existing ratings (MVA):	SN/SE	WN/WE
220-69 Plymouth – Merion	418/519	518/597
New ratings (MVA):	SN/SE	WN/WE
220-69 Plymouth – Merion	762/884	799/922

Estimated cost: \$29.2M
Alternatives Considered: Replacing only the static wire, conductors, insulators, and hardware.

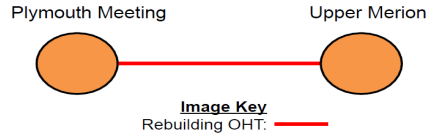
This alternative was not pursued since most of the current structures are 96 years old, in deteriorating condition, and wouldn't be able to support the lifespan of the replacement conductor.

Projected In-Service: 12/31/26

Project Status: Engineering

Model: 2028 RTEP

PJM TEAC – PECO Supplemental 10/31/2023



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

PECO estimates the total Project cost to be \$50.2 million. Of that cost, \$13.5 million is attributed to materials (new conductor/hardware, optical ground wire, structures, foundations, substation equipment). The remaining costs are attributable to direct labor—primary engineering and design, clearance reviews, and electrical/civil construction—and allocated to PECO overhead and management costs. PECO will own, finance, and build the proposed Project.

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 February 2026 for pouring concrete foundations. The remainder of the Project requires taking a transmission outage, currently scheduled for September 13, 2027, to December 10, 2027. The proposed in-service date of the Project is December 30, 2027.

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.

Appendix 4
Attachment 2: Checklist (Redline)



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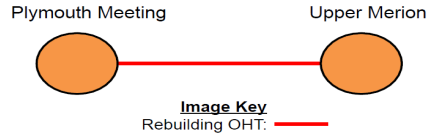
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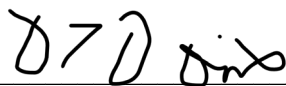
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Pennsylvania :**

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: 01/29/2026



Drew T. Davis
Vice President, Transmission and Substation