

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 220-80 Line and 220-101 Line Located in Norristown, West Norriton Township, and Upper Merion Township, Montgomery County, Pennsylvania
Docket No. A-2025-3057320**

Dear Secretary Homsher:

Enclosed for filing on behalf of PECO Energy Company (“PECO”) is an Amendment to the Letter of Notification (“LON”) filed on September 9, 2025, in the above-captioned docket. The LON requested Commission approval to construct two transmission lines and other structures related to the 220-80 Line and 220-101 Line within Norristown, West Norriton Township, and Upper Merion Township, Montgomery County, Pennsylvania to connect to the new Forge Springs Substation (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.

As stated in the LON, PECO respectfully requests Commission review and approval of the LON on or before the March 12, 2026 Public Meeting in order to allow construction of the Project to commence in the second quarter of 2026.

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 that reads "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 220-80 Line and 220-101 : **Docket No. A-2025-3057320**
Line Located in Norristown, West :
Norriton 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
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NazAarah Sabree
Commonwealth of Pennsylvania
Office of Small Business Advocate
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ra-sba@pa.gov

Dated: January 30, 2026



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Appendix 1
Letter Of Notification (Clean)

5. The proposed Project is necessary to support the reliability of PECO’s transmission system by facilitating PECO’s relocation of the existing Barbadoes Substation from an area prone to flooding to a new location south of the Schuylkill River, as well as replace facilities of the existing substation that are at end of life. The transmission facilities to be constructed are necessary to connect the existing 230 kV 220-80 Line to the new Forge Springs Substation and to provide power from the new Forge Springs Substation to the existing Barbadoes Substation through a new 230 kV 220-101 Line, as explained below.

6. The estimated cost to design and construct the Project is \$95.6 million, of which approximately \$24.8 million will be for transmission work and approximately \$70.77 million will be for distribution work. Approximately \$34.5 million of that cost 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.

7. The Project has a scheduled construction start date of the second quarter of 2026 for the substation and the first quarter of 2027 for the transmission facilities, to meet an in-service date of the fourth quarter of 2029. The Project requires a transmission outage. PECO has not formally requested to take an outage but anticipates taking an outage for the reconductoring work in the Spring of 2029.

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

- Attachment 1 – Plan & Profile Drawings C-PP-220-80-A2
- Attachment 2 – Plan & Profile Drawings C-PP-220-101-A2

Appendix 2
Letter of Notification (Redline)

5. The proposed Project is necessary to support the reliability of PECO's transmission system by facilitating PECO's relocation of the existing Barbadoes Substation from an area prone to flooding to a new location south of the Schuylkill River, as well as replace facilities of the existing substation that are at end of life. The transmission facilities to be constructed are necessary to connect the existing 230 kV 220-80 Line to the new Forge Springs Substation and to provide power from the new Forge Springs Substation to the existing Barbadoes Substation through a new 230 kV 220-101 Line, as explained below.

6. The estimated cost to design and construct the Project is \$95.6 million, of which approximately \$24.8 million will be for transmission work and approximately \$70.77 million will be for distribution work. Approximately \$34.5 million of that cost 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. ~~\$33 million of the project costs are included for reimbursement in PECO's federal Infrastructure and Investment Jobs Act grant contract with the United States Department of Energy utilizing funding from the Infrastructure Investment and Jobs Act. The Department of Energy has partially reimbursed PECO on a monthly basis totaling \$116,713, with the last reimbursement received on May 30, 2025.~~

7. The Project has a scheduled construction start date of the second quarter of 2026 for the substation and the first quarter of 2027 for the transmission facilities, to meet an in-service date of the fourth quarter of 2029. The Project requires a transmission outage. PECO has not formally requested to take an outage but anticipates taking an outage for the reconductoring work in the Spring of 2029.

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 \$95.6 million, of which approximately \$24.8 million will be for transmission work and approximately \$70.77 million will be for distribution work. \$34.5 million of that cost 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.

On March 23, 2025, PECO executed an agreement with Upper Merion Township in which the Township confirmed that PECO shall not be required to obtain any permits or approvals pursuant to any Township Ordinances governing zoning, subdivision and land development and construction/building codes, and that the Township will not oppose PECO's petition under Section 619 of Pennsylvania's Municipalities Planning Code. PECO has also received verbal support from the then-current Chair of the Montgomery County Commissioners, a state representative of the area, and a state senator, but has not received written documentation regarding the Project from these representatives.

On August 20, 2025, PECO responded to a request of a Norristown Borough engineer for technical information and provided the Project's plan and profile drawings and information regarding the location of proposed transmission structures.

11. Please provide the anticipated construction commencement date and the proposed in-service date of the project.

The anticipated construction commencement date is the second quarter of 2026 for the substation and the first quarter of 2027 for the transmission facilities. The Project requires taking a transmission outage, and PECO anticipates taking an outage in the Spring of 2029. The proposed in-service date of the Project is the fourth quarter of 2029.

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 new 220-80 Line will tap into the existing 220-80 Line within the existing right-of-way for approximately 475 feet, and the remaining approximately 0.6 miles will be located within a new approximately 125-foot-wide right-of-way. The entirety of the new

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 \$95.6 million, of which approximately \$24.8 million will be for transmission work and approximately \$70.77 million will be for distribution work. \$34.5 million of that cost 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. ~~\$33 million of the project costs are included for reimbursement in PECO's federal Infrastructure and Investment Jobs Act grant contract with the United States Department of Energy utilizing funding from the Infrastructure Investment and Jobs Act. The Department of Energy has partially reimbursed PECO on a monthly basis totaling \$116,713, with the last reimbursement received on May 30, 2025.~~

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Construction of the 220-80 Line and 220-101 :
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Township, and Upper Merion Township, :
Montgomery County, 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