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March 5, 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 220-84 Line, 220-85 Line, and 220-97 Line Located in Marcus Hook Borough and Lower Chichester Township, Delaware County, Pennsylvania
Docket No. A-2026-3060477

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 :
Construction of 220-84 Line, 220-85 Line, : Docket No. A-2026-3060477
and 220-97 Line Located in Marcus Hook :
Borough and Lower Chichester Township, :
Delaware County, Pennsylvania :**

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

TUS-A-1:

Reference the Letter of Notification, Paragraph 5. Please explain whether the subject project is related to PECO's filing at Docket No. A-2026-3059976.

RESPONSE:

The project that is the subject of this Letter of Notification involves the Linwood Substation (the "Linwood Project"). The Linwood Project is separate from the project subject to the Letter of Notification in Docket No. A-2026-3059976, which involves the Post Substation (the "Post Project").

The two projects are similar as both projects involve different portions of the 220-97 Line and PECO will complete comparable transmission work in each project to replace similar in-line polymer insulators that separate 230 kV circuits located along the existing Amtrak Northeast Corridor in PECO's service territory. In addition, the transmission line taps at the Linwood Substation and Post Substation have similar layouts and configurations. However, the projects are distinct as each involves discrete substations (the Post substation and the Linwood substation) and segments of transmission lines, the transmission-related activities will occur at different times, and the costs for each project are separate.

TUS-A-2:

Reference the Letter of Notification, Paragraph 13. Please provide a detailed explanation as to why the existing configuration using six insulators is now an issue where it wasn't previously.

RESPONSE:

The Linwood Substation tap into the 220-97 Line (the “Linwood tap”) was constructed in 2002 and is situated within Amtrak’s right-of-way adjacent to the former Sunoco refinery site. At the time of the Linwood tap installation and afterwards, the operating refinery was fed by the Blueball Substation. In 2017, PECO constructed the Post Substation to meet load demand in the area, interconnected it with the Linwood Substation, and installed a new tap to supply the refinery (the “Post tap”).

At the time of the Post tap installation, the refinery experienced scheduled annual outages to support plant maintenance activities. During these refinery outages, PECO coordinated and performed maintenance on critical transmission structures, taking into account additional restrictions associated with Amtrak operations. PECO also maintained a stock of polymer in-line insulators to facilitate rapid restoration in the event of a failure.

Initially, the six in-line insulators at the Linwood tap posed less of a reliability concern as the refinery was fed from the Blueball Substation. However, the in-line insulators became an increased reliability risk when PECO retired the Blueball Substation in 2019 and the electrical load for the converted refinery and other customers served by the Blueball Substation was transferred to the Post Substation, which was fed in part by the line from Linwood Substation with in-line insulators. Thereafter, if the Linwood tap in-line insulators went out of service, power to the Post Substation and to the customers served by that substation (including the refinery) would be single serviced.

In 2019, the refinery also completed a conversion to a liquified natural gas (“LNG”) storage facility which does not have the same regular outage schedule and has different equipment requirements for power supply. As a result, the reliability concern associated with the in-line insulators incorporated into the tap design which had previously been maintained during refinery outages increased due to the lack of routine outage opportunities

After the conversion of the current LNG refinery and following the identification of the increased reliability risk posed by the in-line insulators, PECO began planning the Linwood Project.

TUS-A-3:

Reference the Letter of Notification, Attachment 2, Item 9. Please provide a detailed breakdown of the subject project costs.

RESPONSE:

Please see the table set forth below.

| Project Cost Estimate - As filed with PUC | \$US |
|---|--------------------|
| Materials | |
| Foundations (Drilling/concrete and rebar) | \$211,113 |
| Transmission Electrical components | \$405,356 |
| Labor | |
| Engineering Design (Transmission) | \$255,000 |
| Construction: Transmission electrical line | \$322,978 |
| Demolition/Restoration | \$25,000 |
| Construction: Foundations | \$314,200 |
| Amtrak rail protection, and support | \$134,000 |
| Environmental (Engineering Permits and Inspections) | \$22,000 |
| Erosion and Sediment Plan, Grading and Access | \$40,000 |
| Matting | \$40,000 |
| 3rd party inspections of material | \$48,000 |
| Contingency | \$181,765 |
| Total Projected Cost | \$1,999,412 |

TUS-A-4:

Reference the Letter of Notification, Attachment 2, Item 11. Please explain why PECO is filing the project approximately one year ahead of construction.

RESPONSE:

PECO is currently planning a significant number of near-term transmission projects and intends to file several LONs and/or transmission siting applications with the Commission this year. In particular, PECO anticipates filing the majority of these filings in the second half of 2026. PECO submitted this LON in Q1 of 2026 to help distribute the total number of filings more evenly for the year in an effort to reduce the total burden for the Commission and PECO in 2026.

In addition, as explained in response to TUS-A-1, while the Linwood Project is separate from the Post Project, which has an earlier construction start date than the Linwood Project, the two projects share similarities with regard to the needs for the projects and proposed construction activities. PECO anticipated there may be some efficiencies in concurrent preparation and filing of the Letters of Notification and addressing any Commission inquiries relating to the projects.

Matthew L. Homsher, Secretary
March 5, 2026
Page 2

TUS-A-5:

Reference the Letter of Notification, Attachment 2, Item 21. Please provide the age, anticipated service life, and condition of the components to be removed.

RESPONSE:

The only components to be removed as part of the Linwood Project are the six in-line insulators, which are 25 years old and will be replaced with new dead-end structures. The in-line insulators have an anticipated service life of 25 years and therefore the in-line insulators to be removed as part of the Linwood Project are at end of life.

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and 220-97 Line Located in Marcus Hook :
Borough and Lower Chichester Township, :
Delaware County, Pennsylvania :**

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

Office of Consumer Advocate
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PA Public Utility Commission
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Jordan Van Order
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Dated: March 5, 2026


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VERIFICATION

I, Drew T. Davis, hereby state that 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: March 5, 2026



Drew T. Davis
Vice President, Transmission and Substation