

# Morgan Lewis

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March 10, 2026

## VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor North  
Harrisburg, PA 17120

**Re: Petition of PECO Energy Company for a Finding of Necessity Pursuant to 53 P.S. § 10619 that the Situation of a Control Building Associated with the Forge Springs Substation in Upper Merion Township, Montgomery County, Is Reasonably Necessary for the Convenience and Welfare of the Public Docket No. P-2025-3057330**

**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**

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Dear Secretary Homsher:

Enclosed for filing in the above-captioned proceedings is PECO Energy Company's Response to the Data Request of the Bureau of Technical Utility Services, Question Nos. A-14 through A-20.

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.)

**Morgan, Lewis & Bockius LLP**

2222 Market Street  
Philadelphia, PA 19103  
United States

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company for a :  
Finding of Necessity Pursuant to 53 P.S. § :  
10619 that the Situation of a Control :  
Building Associated with the Forge Springs :  
Substation in Upper Merion Township, :           Docket No. P-2025-3057330  
Montgomery County, Is Reasonably :  
Necessary for the Convenience and Welfare :  
of the Public :**

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

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

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**TUS-A-14:**

Please explain how withdrawal from the DOE grant gives PECO greater flexibility to manage and prioritize projects in a way that allows PECO to reallocate funding to projects that maximize or enhance grid reliability, resiliency, and expanding capacity.

**RESPONSE:**

The grant funding included time-sensitive project completion dates. PECO’s withdrawal from the grant provides PECO greater flexibility in determining the timing, resources, and budget allocations of projects to ensure the continued reliable and resilient operation of the grid.

**TUS-A-15:**

Please provide specific examples of what is meant by “projects that maximize or enhance grid reliability, resiliency, and expanding capacity.”

**RESPONSE:**

Examples of grid reliability and resiliency enhancements and capacity expansion include upgrades to aging mainstem cables from substations which impact customer outages, replacing equipment that is at end of life, and upgrading conductors and equipment on 4 kV distribution systems throughout the territory to ensure capacity for areas experiencing customer growth.

**TUS-A-16:**

Please explain whether the \$33 million in approved DOE funding is tied to milestones relating to the construction of the Forge Springs Substation Transmission Line Project located in Norristown, West Norriton, and Upper Merion Townships, Montgomery County, PA. in part or in whole. If so, please explain the portion of the funding, if any, tied to or dependent upon this particular project.

**RESPONSE:**

The funding was not tied to specific milestones but was provided as reimbursement for actual spending PECO had incurred on work on the Forge Springs 220-80 Line and 220-101 Line project (“Project”). Reimbursement was tied to mandatory quarterly reporting.

**TUS-A-17:**

Please explain whether PECO has withdrawn from seeking funding, and if so, how much funding of the \$33 million award has PECO received so far?

**RESPONSE:**

PECO submitted notification of withdrawal to the DOE on November 24, 2025. Funding reimbursement received for a portion of the Project spending PECO had incurred to that date is \$949,000.

**TUS-A-18:**

Please explain whether PECO has returned any DOE funding it has received or whether PECO required to return funding to the DOE upon withdrawal from the award that could have been used towards cost recovery for this project.

**RESPONSE:**

PECO has not returned any funding and is not required to do so, as the funding received was DOE-approved reimbursement for a portion of the spending PECO had incurred on the Project.

**TUS-A-19:**

Please explain whether PECO has permission from the DOE to reallocate funds received to other projects after PECO withdraws from its award.

**RESPONSE:**

PECO has not sought DOE permission to reallocate the funds as they are reimbursement for actual spending PECO had incurred on the Project and therefore there is no need to reallocate.

**TUS-A-20:**

Please explain whether PECO has permission to keep DOE funding received before withdrawing from the award and to use the funds towards other projects than the instant one.

**RESPONSE:**

Yes, DOE has confirmed funding received prior to withdrawal does not require repayment. As stated in response to TUS-A-19, the funds received were reimbursement for actual spending PECO had incurred on the Project.





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Dated: March 10, 2026



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