

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Letter of Notification of PECO Energy Company :
for approval to construct the 220-09 230 kV :
Transmission Line Tap Project located in East : Docket No. A-2025-3054731
Whiteland Township, Chester County, :
Pennsylvania**

**MOTION OF JULIANNA FERRIS FOR LEAVE TO FILE REPLY
TO PECO ENERGY COMPANY'S ANSWER**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Julianna Ferris (“Petitioner”), pro se, respectfully moves for leave to file a Reply to the Answer of PECO Energy Company (“PECO”) filed July 24, 2026 in the above-captioned matter, and in support states as follows:

1. On July 14, 2026, Petitioner filed a Petition for Rescission or Amendment of the Commission's October 9, 2025 Order pursuant to 66 Pa. C.S. § 703(g) and 52 Pa. Code § 5.572.
2. On July 24, 2026, PECO filed an Answer opposing the Petition.
3. PECO's counsel served the Answer by email on July 24, 2026, with both the initial and corrected emails sent after 6:00 p.m. that evening, outside normal business hours. The initial email was sent to an incorrect address and was resent, corrected, seventeen minutes later. The physical copy of PECO's Answer served by mail did not arrive until Saturday, July 25, 2026. Petitioner raises this only to ensure the record accurately reflects the date on

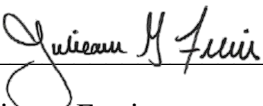
which the Answer was actually received, and files this Motion and the accompanying Reply well within the time permitted under either date.¹

4. PECO's Answer raises affirmative defenses and new matter not addressed in the Petition, including but not limited to: a challenge to Petitioner's standing; an argument that the Project's construction activities do not occur on the Foote Mineral Superfund property; an argument regarding the scope of "environmental matters" under 52 Pa. Code § 57.72(c)(14); and an argument regarding this Commission's jurisdiction relative to CERCLA.
5. To the extent any portion of PECO's Answer is deemed to raise new matter, Petitioner is entitled to file a Reply as of right pursuant to 52 Pa. Code § 5.63(a). Out of an abundance of caution, and to ensure a complete record before the Commission, Petitioner respectfully requests leave to file the accompanying Reply.
6. This Motion and the accompanying Reply are filed within 20 days of service of PECO's Answer, in accordance with 52 Pa. Code § 5.63(a).

WHEREFORE, Petitioner respectfully requests that the Commission grant leave to file the accompanying Reply.

¹PECO's Answer notes, in footnote 1, that its counsel did not receive e-mail service of the Petition and that physical delivery did not arrive until the afternoon of July 15, 2026, one day after the certified service date. Petitioner notes that PECO's own service of its Answer suffered a comparable delay: the physical copy of PECO's Answer did not arrive until Saturday, July 25, 2026, one day after PECO's stated July 24, 2026 filing date, and PECO's e-mail service was itself sent to an incorrect address before being corrected seventeen minutes later, after 6:00 p.m. Petitioner raises this only to note that the service timing PECO highlights in its own footnote was not unique to Petitioner's filing.

Respectfully submitted,



Julianna Ferris
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Pro se

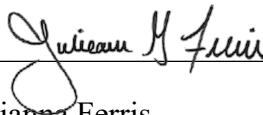
Dated: July 30, 2026

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VERIFICATION

I, Julianna Ferris, hereby state that the facts set forth in the foregoing Motion for Leave to File Reply are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



Julianna Ferris

Dated: July 30, 2026

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Motion for Leave to File Reply upon the persons listed below, in accordance with the requirements of 52 Pa. Code §§ 1.54, 5.41(b) and 5.572(b):

Via Overnight Delivery and E-Mail:

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Julianna Ferris

Dated: July 30, 2026