

**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 : **Docket No. A-2025-3054731**
the Siting and Construction of the 220-09 Line Tap :
Project Located in East Whiteland Township, : **Docket No. P -2026-3064335**
Chester County, Pennsylvania :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Supplemental

Notice upon the persons listed below, in accordance with the requirements of 52 Pa. Code §§

1.54, 5.41(b) and 5.572(b):

Via E-Mail:

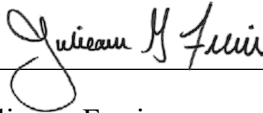
Kenneth M. Kulak, Esq.
Morgan, Lewis & Bockius LLP
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akaster@pa.gov

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PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
stepwilson@pa.gov


Julianna Ferris

Dated: August 19, 2026

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**EMERGENCY SUPPLEMENTAL NOTICE AND
RENEWED REQUEST FOR IMMEDIATE STOP-WORK ORDER**

Julianna Ferris, pro se Petitioner, respectfully but urgently submits this Emergency Supplemental Notice and renews her request that the Commission immediately issue a stop-work order halting all activity by PECO Energy Company related to unapproved Phase 2 scope of work for Customer (Sentinel/Greenfig) at the Customer Property for project at the Foote Mineral Co. Superfund Site.

1. Today, August 19, 2026, two control houses were delivered directly onto the Customer Property - the Foote Mineral Co. Superfund Site - in East Whiteland Township. This delivery was independently confirmed the same day by Catherine, the East Whiteland Township Manager, in a written communication attached as Exhibit 1. It is further documented by video, attached as Exhibit 2 and authenticated by the accompanying declaration, showing the equipment traveling down the road and onto the Site, with embedded GPS metadata confirming the exact location.
2. These two control houses are scoped specifically for Phase 2 of this project. PECO's own supplemental filings to PJM describe Phase 2 as two new radial 230 kV feeds - Customer Feed #1 and Customer Feed #2 - from the Planebrook #7 and #9 buses, each requiring its own breaker and control equipment. Two control houses, delivered together, match this

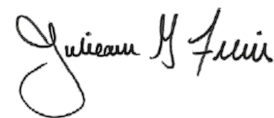
configuration precisely. Nothing about Phase 1 - a single line tap on PECO's own property, already completed - calls for any control house at all.

3. Phase 2 has not been reviewed or approved by this Commission. It has no Letter of Notification. PECO's own Reply to Data Request Set 2 (A-5, A-6) states plainly: "Only Phase 1 is subject to the Letter of Notification in Docket No. A-2025-3054731. PECO will seek any required approvals for transmission lines and structures related to Phase 2 in a separate filing." That filing has never been made.
4. Phase 2 failed PJM's own Do No Harm reliability analysis due to overloads identified on the PJM system. PECO's affidavit admits that as of PJM's September 24, 2025 communication, Phase 2 "would not pass the do no harm analysis at this time." PECO has not resolved these overloads, has not obtained a supplemental project ID for Phase 2, and has not returned to this Commission for authorization.
5. Despite this, PECO is now moving physical construction equipment for Phase 2 directly onto the Customer Property (Foote Mineral Superfund Site) - equipment that does not appear anywhere in the LON, was never disclosed to this Commission, and corresponds to work that failed PJM's own reliability screening.
6. This is directly contrary to PECO's sworn legal attestations to this Commission. On August 4, 2026, PECO filed a verified Answer, sworn by Drew T. Davis, Vice President, Transmission and Substation, under penalty of 18 Pa. C.S. § 4904, stating that "PECO is not undertaking any construction activities for the Project on the Customer Property that could affect the Superfund Site" and that PECO's construction "has not created any ground disturbance on the Customer Property." PECO relied on these representations to persuade

the Commission that no emergency existed. Those representations cannot be reconciled with equipment for unapproved Phase 2 work arriving on that same property today.

7. PECO is not adhering to the process this Commission requires. PECO is proceeding with unauthorized, unreviewed construction activity for a phase of the project that failed federal grid reliability screening, on an active Superfund site, while its own sworn filings tell this Commission the opposite is true. This is precisely the kind of unauthorized activity Petitioner sought to prevent in her original Emergency Petition, and it is happening now, in real time, while the Petition for Reconsideration remains pending.
8. Petitioner respectfully but urgently pleads with the Commission to issue an immediate stop-work order halting any and all Phase 2 activity at the Site, pending full Commission review of PECO's Letter of Notification obligations for Phase 2 and an accounting of the equipment already delivered.
9. Petitioner provides the Township Manager's written communication as Exhibit 1, video documentation as Exhibit 2, and the accompanying Declaration of Julianna Ferris authenticating both.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Julianna Ferris". The signature is fluid and cursive, with the first name being more prominent.

Julianna Ferris
28 Mountain Laurel Lane
Malvern, PA 19355

Dated: August 19, 2026

EXHIBIT 1

**Email from Catherine, East Whiteland Township Manager
August 19, 2026**

Good Morning,

Following up on Steve's email, we've received the following information today: delivery at the site is control houses for PECO work to be done at a future time. These control houses will be stored on the existing PECO pad, but no additional work will be done as it will require permits from the Township that have not been issued. We would also like to note that we've been advised a crane will be delivered to the site either today or tomorrow and will also be stored as the site. The site contractor has been directed by the Township that it may not use the crane for work beyond storage of same at the site. Delivery and storage such as this does not require permits. Thank you.

[Full email chain to be attached as filed, including headers showing sender, recipient(s), and date/time sent.]



Julie Ferris <julieg186@gmail.com>

RE: Generators are being delivered

1 message

Catherine Ricardo <cricardo@eastwhiteland.org> Wed, Aug 19, 2026 at 11:45 AM

To: Julie Ferris <julieg186@gmail.com>, Steven Brown <sbrown@eastwhiteland.org>
Cc: "Muth, Senator Katie" <Katie.Muth@pasenate.com>, Kelly Donia <kelly@doniadesigns.com>, Scott Lambert <slambert@eastwhiteland.org>, Ginny Kerslake <Gmarcillekerslake@fwwatch.org>, Tony Gianino <anthony.gianino2@gmail.com>, Rick Wall <richardwall07@gmail.com>, Peter Fixler <pfixler@eastwhiteland.org>, Clinton Smith <csmith@eastwhiteland.org>, Gaya <Krishnan.bindhuk1@gmail.com>

Good Morning,

Following up on Steve's email, we've received the following information today: delivery at the site is control houses for PECO work to be done at a future time. These control houses will be stored on the existing PECO pad, but no additional work will be done as it will require permits from the Township that have not been issued. We would also like to note that we've been advised a crane will be delivered to the site either today or tomorrow and will also be stored as the site. The site contractor has been directed by the Township that it may not use the crane for work beyond storage of same at the site. Delivery and storage such as this does not require permits. Thank you.

Catherine Ricardo**Assistant Township Manager**

East Whiteland Township

209 Conestoga Road

Frazer, PA 19355

Direct: 610-897-4280

From: Julie Ferris <julieg186@gmail.com>**Sent:** Wednesday, August 19, 2026 10:41 AM**To:** Steven Brown <sbrown@eastwhiteland.org>**Cc:** Muth, Senator Katie <Katie.Muth@pasenate.com>; Kelly Donia <kelly@doniadesigns.com>; Catherine Ricardo <cricardo@eastwhiteland.org>; Scott Lambert <slambert@eastwhiteland.org>; Ginny Kerslake

EXHIBIT 2

Video Recording of Equipment Delivery August 19, 2026

[Video file to be attached as filed. See accompanying Declaration of Julianna Ferris authenticating the recording's date, content, and location, including embedded GPS metadata of 40.0419° N, 75.5792° W and device creation timestamp of August 19, 2026.]

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**DECLARATION OF JULIANNA FERRIS
IN SUPPORT OF EMERGENCY SUPPLEMENTAL NOTICE**

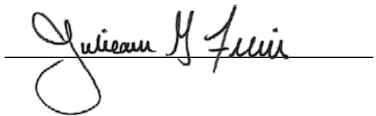
I, Julianna Ferris, declare as follows:

1. On August 19, 2026, I obtained a video recording depicting delivery of two control house structures by flatbed truck, escorted by a pilot vehicle, traveling toward and into the Foote Mineral Co. Superfund Site in East Whiteland Township, Chester County, Pennsylvania. This video is attached as Exhibit 2 to my Emergency Supplemental Notice.
2. The video file contains embedded metadata recorded automatically by the capturing device (an iPhone 16 Pro), including a creation timestamp of August 19, 2026, and GPS coordinates of 40.0419° N, 75.5792° W.
3. These coordinates correspond to the immediate vicinity of the Foote Mineral Co. Superfund Site (Customer Property) and are consistent with the video depicting the equipment traveling down the road and onto the Customer Property itself.
4. The video shows two separate control house structures delivered to the Site.
5. On August 19, 2026, I also received a written communication from Catherine, the East Whiteland Township Manager, confirming that control houses and a crane were delivered

to the Customer Property that day for PECO. That communication is attached as Exhibit 1 to my Emergency Supplemental Notice.

6. I make this declaration to authenticate the attached video and Township communication, and their contents, for submission to the Commission in connection with my Emergency Supplemental Notice filed in this docket.

I verify that the statements in this declaration are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904.

A handwritten signature in cursive script, reading "Julianna H. Ferris", is written over a horizontal line.

Julianna Ferris

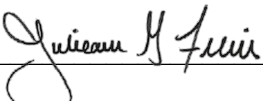
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VERIFICATION

I, Julianna Ferris, hereby state that the facts set forth in the foregoing Supplemental Notice 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: August 19, 2026