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May 25, 2016

VIA eFILING

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor Harrisburg, PA 17120

Re: Petition of PECO Energy Company For: (1) Approval of its Microgrid Integrated Technology Pilot Plan And (2) Issuance of A Declaratory Order Regarding the Recovery of Microgrid Costs, Docket No. P-2016-2546452

Application For Construction of Microgrid Distributed Energy Resources Fueled By Natural Gas, Docket No. A-2016-2546450

Dear Secretary Chiavetta:

On May 18, 2019, PECO Energy Company ("PECO") filed the above-referenced Petition and Application. As set forth therein, PECO is requesting approval of its Microgrid Integrated Technology Pilot Plan (the "Microgrid Pilot") to develop and deploy a community microgrid in Concord Township, Pennsylvania, which will be integrated with PECO's distribution system. The Microgrid Pilot will focus on improving the distribution system's ability to sustain and recover from adverse events (including severe weather) and on providing reliable access to essential services during power outages. Resulting information will be shared with the Commission and other stakeholders to facilitate the successful deployment of additional microgrids and distributed energy resources in Pennsylvania.

PECO submitted an Application with the Petition to obtain Commission approval under Section 519 of the Public Utility Code, 66 Pa. C.S. § 519, to construct distributed energy resources fueled by natural gas as part of the Microgrid Pilot. These resources will ensure that the microgrid has sufficient generation to meet typical customer peak load during an outage at all times. PECO also proposed a detailed schedule for consideration of both its Petition and Application by the Commission, including the submission of direct testimony by any intervenors, hearings and a Commission decision by February 2017.

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PECO recognizes that Section 519(d) provides that "[i]f the commission fails to approve or disapprove an [application under Section 519] within six months of the date on which the application is filed, it shall be lawful for the affected utility to construct the proposed electric generating unit as though the commission had approved the application." However, PECO believes that its proposed schedule is more appropriate for consideration of the issues presented in both the Petition and Application instead of the shorter time period for consideration of the Application established by Section 519(d). PECO therefore waives its right to a decision within six months of the filing of the Application and respectfully requests that the Commission consider the schedule set forth in its filing for both the Petition and Application.

If you have any questions, please do not hesitate to contact me directly at 215.963.5384.

Very truly yours,

MSS/adz

Enclosures

c: Per Certificate of Service