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Mr. Steven Herling  
Vice President, Planning  
PJM Interconnection, LLC  
Valley Forge Corporate Center  
955 Jefferson Avenue  
Norristown, PA 19403-2497

Re: Exelon comments to the PJM Board on August 22, 2007 TEAC meeting.

Thank you for inviting the PJM stakeholders to submit comments on the proposed RTEP projects presented in the August 22, 2007 Transmission Expansion Advisory Committee (TEAC) meeting. After reviewing the proposed projects, Exelon would like to raise the following issue and offer suggestions for resolution and improvement:

**PJM should provide additional justification via fact sheets for baseline upgrades presented to the stakeholders** – PJM presented a significant backbone project and an operational performance improvement upgrade with limited alternative and benefit material. While Exelon is not challenging the need for or benefits of these upgrades, we have previously requested that PJM create project fact sheets for RTEP upgrades that include:

- Present and future projected system conditions - This would be a written description of where the facility is planned, opportunity for expansion utilizing existing Rights-Of-Way or facilities, etc. Also in this section would be a facility overload or voltage violation table to show the trend toward upgrade justification.
- Assumptions used - Tests performed that identified need for a system upgrade, other significant upgrades modeled, and generation additions/retirements modeled
- Description of proposed upgrade, benefits and cost
- Description of alternatives considered, benefits and cost
- One line diagram of upgrade

This information is of particular interest for significant interregional backbone projects or upgrades that are not required to meet specific NERC, PJM or transmission owner planning criteria but are proposed to address operational performance issues. The MAPP project and Hanging Rock Substation 765kV breaker addition presented at the TEAC meeting represent these types of projects respectively. The affected and/or offering transmission owner(s) can be used as a resource to either prepare or contribute to the development of the fact sheets. Exelon believes that advance circulation of this information would allow PJM stakeholders to assess the impact of upgrades, evaluate alternatives, and would meet the intent of FERC's Order No. 890, calling for an open and transparent planning process.

**PJM should review the opportunity to use displaced 500-230kV autotransformers due to RTEP upgrades as spares that could offset spares required by PRA.**– PJM presented RTEP upgrades to replace 500-230kV transformers. Exelon recommends that PJM include into their process, a re-

evaluation of PRA required spare 500-230kV transformer inventory as a result of additional transformers made available by RTEP upgrades.

Please feel free to contact me by phone at 215-841-4706, or e-mail at [susan.ivey@exeloncorp.com](mailto:susan.ivey@exeloncorp.com) .

Sincerely,

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Cc: Dave Weaver  
Ron Chu  
Ray Connolly  
Ron Szymczak