Chuck and Adam, Exelon appreciates the opportunity to comment on priorities and ways to improve the interregional planning process. Given the short turnaround to submit comments, our comments provide a list of the areas where we believe improvements are needed and are high level. We will be happy to answer any questions or to provide more specific recommendations at a later date.

Areas for interregional planning improvement

1. Eliminate the $20MM project cost threshold
2. Improve interconnection coordination and identification of cross border upgrades
3. Eliminate provisional and conditional interconnections
4. Improve participant funded process and coordination
5. Improve transmission service request process and coordination
6. Improve models to capture actual congestion on seam
7. Institute policies to eliminate model errors and reduce timing to correct errors
8. Align cycles, models, timelines
9. Consider eliminating JOA metrics (so only need to pass 2 metrics test) or align regional metrics
10. Pick one future scenario for consistency and certainty
11. Conduct no harm test on interregional projects with potential of passing required metrics during the interregional study to capture total cost of project
12. Consider project cost review by third party of interregional projects with potential of passing required metrics

Thank you,

Marka Shaw
Wholesale Market Development Manager
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