

September 3, 2010

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Commonwealth Edison Docket ER10-____-000
Filing of Peak Load Contribution Methodology under Section 205
of the Federal Power Act

Dear Madam Secretary:

Pursuant to Section 205 of the Federal Power Act (“FPA”)¹ and Part 35 of the regulations of the Federal Energy Regulatory Commission (“FERC” or “the Commission”),² Commonwealth Edison Company, on behalf of itself and its wholly-owned subsidiary, Commonwealth Edison Company of Indiana, Inc. (collectively “ComEd”), submits an original and six copies of this filing to add a new schedule to ComEd’s Attachment H-13 – Attachment H-13C, Determination of Capacity Peak Load Contributions and Network Service Peak Load Contributions, to the PJM Interconnection, L.L.C. (“PJM”) Open Access Transmission Tariff (“OATT”).³ The proposed tariff sheets will provide customers with a description of the methodology by which ComEd determines the Capacity Peak Load Contributions (“CPLCs”) and Network Service Peak Load Contributions (“NSPLCs”) reported to PJM for retail customers and wholesale municipal customers in the ComEd zone of PJM. ComEd’s CPLC methodology complies with Schedule 8 of PJM’s Reliability Assurance Agreement (“RAA”)⁴ and is consistent with the guidelines of PJM Manual 18. ComEd’s NSPLC methodology complies with the PJM OATT. ComEd requests that the Commission accept these proposed tariff sheets effective November 2, 2010.

¹ 16 U.S.C. § 824d (2006).

² 18 C.F.R. Part 35 (2009).

³ PJM Interconnection, L.L.C., FERC Electric Tariff, Sixth Revised Volume No. 1. The facilities of Commonwealth Edison Company of Indiana, Inc. are also included in the ComEd zone. There are no other transmission owners within the ComEd zone.

⁴ PJM Interconnection, L.L.C., Rate Schedule No. 44.

I. Identification of Applicant

ComEd, an Illinois corporation, is an operating subsidiary of Exelon Corporation, a Pennsylvania corporation. ComEd maintains more than 91,000 miles of overhead transmission and distribution lines in Northern Illinois and provides delivered electric power to more than 3.8 million customers. ComEd does not own any generation facilities. ComEd's retail service is regulated by the Illinois Commerce Commission ("ICC"), while its transmission and sales for resale of electric energy in interstate commerce are regulated by the Commission. ComEd transferred operational control over its transmission facilities to PJM on May 1, 2004. ComEd is the Electric Distributor or Electric Distribution Company ("ED" or "EDC") for the ComEd zone of PJM, as defined by the RAA.

II. Background

As the EDC for the ComEd zone, ComEd reports to PJM CPLCs for purposes of PJM's determination of capacity charges, as well as NSPLCs for PJM's determination of network transmission charges.

The basic requirements for determining load obligations for the PJM Capacity Market are set forth in the PJM RAA at Schedule 8, with implementing details contained in PJM's Manual 18, Section 7. Under paragraph D of Schedule 8 of the RAA,⁵ ComEd is responsible for allocating the most recent weather-normalized summer peak load to each retail and wholesale municipal customer in the zone. ComEd's CPLC methodology complies with Schedule 8 of the RAA and is consistent with the guidelines of PJM Manual 18.

Section 34 of the PJM OATT⁶ specifies how PJM determines transmission charges for network load. As the EDC for the ComEd zone, ComEd reports NSPLCs to PJM to assist PJM's determination of network transmission charges. A number of other PJM EDCs have filed their CPLC and NSPLC calculation methodologies as part of the PJM OATT⁷, and with this filing ComEd seeks to do the same.

III. Persons to Whom Correspondence Should be Addressed

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⁵ RAA, 1st Rev. Sheet No. 39.

⁶ OATT § 34, 3d Rev. Sheet No. 92 to 7th Rev. Sheet No. 93.

⁷ OATT, Attachment M-2, 1st Rev. Sheet No. 466ff.

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IV. Statement of Nature, Reasons and Basis for Filing

Because ComEd is the EDC for the ComEd zone of PJM, Schedule 8 of the PJM RAA makes ComEd responsible for determining the CPLCs for retail and wholesale municipal customers in the zone. ComEd reports those data to PJM, which uses them in determining capacity charges. In addition, ComEd determines the NSPLCs for those customers. ComEd reports those data to PJM, which uses them in determining network service charges. This filing incorporates, in Attachment H-13C of the PJM OATT, ComEd's methodology for determining CPLCs and NSPLCs for retail and wholesale municipal customers. ComEd's CPLC methodology complies with Schedule 8 of the RAA and is consistent with the guidelines of PJM Manual 18. ComEd's methodology for calculating NSPLCs is essentially the same as the methodology for calculating the CPLCs.

As noted above, several PJM EDCs have set forth their procedures for CPLC and NSPLC calculation in the OATT. ComEd is filing its methodology as part of the PJM OATT to help customers in the ComEd zone understand the calculation of their CPLCs and NSPLCs.

V. Compliance with Commission Requirements

A. List of Documents Submitted

ComEd submits herewith an original and six copies of:

1. This transmittal letter;
2. Clean tariff sheets (Appendix A);
3. Redlined tariff sheets (Appendix B);

B. Proposed Effective Date

ComEd respectfully requests that the Commission accept the proposed tariff sheets without condition or modification, to be effective November 2, 2010, without suspension or hearing.

C. Names and Addresses of Persons to Whom a Copy of this Filing has been Mailed.

Pursuant to Section 35.2(e) of the Commission's regulations, a copy of this filing is being served on representatives of PJM, the ICC and the Indiana Utility Regulatory Commission. Copies of this filing are also available for inspection at ComEd's office.

ComEd requests waiver of the service requirements set forth in Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010. PJM has electronically served a copy of this filing, with attachments, upon all PJM Members, as well as all state commissions within the region. In addition, the filing has been electronically posted under the Transmission Owners FERC Filing section of the PJM website. Good cause exists for granting this waiver due to the volume of the potentially interested parties in this matter and the limited resources available for service. Paper copies will be available to any person upon request by contacting counsel of record. The Commission has granted such waiver in the past under similar circumstances.⁸

D. Description of the Filing

A description of the filing is set forth above.

E. Statement of Reasons for the Tariff Change

This transmittal letter explains the reasons for the proposed tariff change, which consists of adding a new Attachment H-13C to the PJM OATT.

F. Requisite Agreement

No agreement is required by contract for the voluntary filing of this calculation methodology.

G. Statement Regarding Inclusion of Any Expense of Costs in Cost of Service Statements that Have Been Alleged or Adjudged Illegal, Duplicative, or Unnecessary Costs that are Demonstrably the Products of Discriminatory Employment Practices.

This filing does not include any expenses in cost of service statements and does not change rates. It merely memorializes a calculation methodology for customer peak load contributions.

H. Cost of Service and Revenue Information to Support Filing and Request for Waiver

⁸ See, e.g., *Great River Energy*, 130 FERC ¶ 61,001, P 48 (2010); *Otter Tail Power Co.*, 129 FERC ¶61,287, P 51 (2009).

There is no cost of service, rate design information or illustrative revenue calculations relevant to this filing because the filing does not implement a rate. The filing merely memorializes the methodology by which ComEd calculates the customer CPLCs and NSPLCs that it reports to PJM.

To the extent that this filing requires waivers of Section 35.13 of the Commission's regulations, ComEd respectfully requests such waivers, including waivers of Section 35.13(c), (d), (e) and (h) of the Commission's regulations.⁹ To the extent that this filing fails to contain any information otherwise required for technical compliance with the Commission's regulations, ComEd respectfully requests that compliance with such regulations be waived. Granting such waivers is in the public interest because the filing does not change rates but merely makes available to the public the methodology by which ComEd calculates peak load contributions of load-serving entities.

VI. Conclusion

WHEREFORE, for the foregoing reasons, ComEd respectfully requests that the Commission accept the proposed revision to the PJM tariff, consisting of the addition of a new Attachment H-13C, effective November 2, 2010.

Respectfully submitted,

/s/ A. Karen Hill

A. Karen Hill

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⁹ 18 C.F.R. §§ 35.13(c), (d), (e) and (h).

APPENDIX A

ATTACHMENT H-13C

Determination of Capacity Peak Load Contributions and Network Service Peak Load Contributions

Section 1 PURPOSE

The purpose of this Attachment H-13C is to describe the methodology used to determine peak load contributions for electric power and energy attributable to customers located in the ComEd Zone.

Section 2 DEFINITIONS

The following definitions are for use in this Attachment H-13C. Capitalized terms used and not defined in this Attachment H-13C but defined in other provisions of the PJM OATT have the meaning given them under those provisions. Capitalized terms used in this Attachment H-13C that are not defined in it or elsewhere in the PJM OATT have the meanings customarily attributed to such terms by the electric utility industry in PJM.

- a) **Average ComEd Coincident Peak Load:** the average of the sum of the (i) five (5) ComEd Zonal Loads established during the PJM Five Peaks in a summer and (ii) the corresponding Load Drop Estimates for such PJM Five Peaks.
- b) **Average ComEd Peak Load:** the average of the five (5) ComEd Zonal Loads established during the ComEd Five Peaks in a summer.
- c) **Average Customer Coincident Peak Load:** the average of the sum of the (i) five (5) customer loads established during the PJM Five Peaks in a summer and (ii) the corresponding Load Drop Estimates for such customer, with such sum adjusted to include applicable distribution and transmission system losses.
- d) **Average Customer Peak Load:** the average of the five (5) loads established by the customer during the ComEd Five Peaks in a summer, with such loads adjusted to include applicable distribution and transmission system losses.

Issued By:

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Vice President, Federal Government Policy

Effective: November 2, 2010

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- e) **ComEd Five Peaks:** the five hours occurring on different calendar days in a summer during which the electric system served by ComEd experiences its five highest daily summer demands.
- f) **ComEd Weather Normalized Peak Load:** the expected ComEd Zonal Load at the time of the PJM system peak load in a summer under normal weather conditions as determined by PJM.
- g) **ComEd Peak Load:** the highest ComEd Zonal Load established for PJM network service in a summer.
- h) **ComEd Zonal Load:** the demand for electricity placed upon the interconnected electricity system operated by PJM that is attributable to customers located in the ComEd Zone.
- i) **Load Drop Estimate:** the kilowatt (kW) value attributable to curtailed demand as determined by PJM.
- j) **PJM Five Peaks:** the five hours occurring on different calendar days in a summer during which the electric system served by PJM experiences its five highest daily summer demands.
- k) **Summer:** the period beginning June 1 and extending through September 30 in a calendar year.

Section 3 DETERMINATION OF THE CAPACITY PEAK LOAD CONTRIBUTION

If a customer's Average Customer Coincident Peak Load for Year Y is greater than or equal to such customer's Average Customer Peak Load for Year Y, then such customer's capacity peak load contribution (CPLC) for year Y+1 is equal to such customer's Average Customer Coincident Peak Load for Year Y.

If a customer's Average Customer Coincident Peak Load for Year Y is less than such customer's Average Customer Peak Load for Year Y, then such customer's CPLC for year Y+1 is determined in accordance with the following equation:

$$CPLC_{Y+1} = ACustCPL_Y + (ComEdNPL_Y - AComEdCPL_Y) \times \frac{ACustPL_Y - ACustCPL_Y}{\sum_{5Pc} (ACustPL_Y - ACustCPL_Y)}$$

Where:

$CPLC_{Y+1}$ = Capacity Peak Load Contribution for the customer, in kW, applicable for the period beginning with June in Year Y+1 and extending through May in Year Y+2.

$ACustCPL_Y$ = Average Customer Coincident Peak Load for the customer for Year Y, in kW.

$ACustPL_Y$ = Average Customer Peak Load for the customer for Year Y, in kW.

$ComEdNPL_Y$ = ComEd Weather Normalized Peak Load for Year Y, in kW.

$AComEdCPL_Y$ = Average ComEd Coincident Peak Load for Year Y, in kW.

\sum_{5Pc} = Summation over all customers for which the Average Customer Coincident Peak Load for Year Y is less than the Average Customer Peak Load for Year Y.

Notwithstanding the previous provisions describing the determination of the $CPLC_{Y+1}$, for certain situations ComEd determines a customer's $CPLC_{Y+1}$ to be equal to (i) the average $CPLC_{Y+1}$ attributable to the delivery class applicable to such customer or (ii) the average $CPLC_{Y+1}$ attributable to the delivery class applicable to such customer scaled to reflect the amount of electricity delivered to such customer. Delivery classes are as described in the General Terms and Conditions of ComEd's Schedule of Rates filed with the Illinois Commerce Commission (Ill. C.C. No. 10).

Issued By: Craig Glazer
Vice President, Federal Government Policy
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Section 4 DETERMINATION OF THE NETWORK SERVICE PEAK LOAD CONTRIBUTION

A customer's Network Service Peak Load Contribution (NSPLC) for Year Y+1 is determined in accordance with the following equation:

$$NSPLC_{Y+1} = ACustPL_Y \times \frac{ComEdPL_Y}{\sum_{Ac} ACustPL_Y}$$

Where:

$NSPLC_{Y+1}$ = Network Service Peak Load Contribution for the customer, in kW, applicable for the period beginning with January in Year Y+1 and extending through December in Year Y+1.

$ComEdPL_Y$ = ComEd Peak Load for Year Y, in kW.

\sum_{Ac} = Summation over all customers.

Notwithstanding the previous provisions describing the determination of the $NSPLC_{Y+1}$, for certain situations ComEd determines a customer's $NSPLC_{Y+1}$ to be equal to (i) the average $NSPLC_{Y+1}$ attributable to the delivery class applicable to such customer or (ii) the average $NSPLC_{Y+1}$ attributable to the delivery class applicable to such customer scaled to reflect the amount of electricity delivered to such customer.

Issued By: Craig Glazer
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APPENDIX B

ATTACHMENT H-13C

Determination of Capacity Peak Load Contributions and Network Service Peak Load Contributions

Section 1 PURPOSE

The purpose of this Attachment H-13C is to describe the methodology used to determine peak load contributions for electric power and energy attributable to customers located in the ComEd Zone.

Section 2 DEFINITIONS

The following definitions are for use in this Attachment H-13C. Capitalized terms used and not defined in this Attachment H-13C but defined in other provisions of the PJM OATT have the meaning given them under those provisions. Capitalized terms used in this Attachment H-13C that are not defined in it or elsewhere in the PJM OATT have the meanings customarily attributed to such terms by the electric utility industry in PJM.

- a) **Average ComEd Coincident Peak Load:** the average of the sum of the (i) five (5) ComEd Zonal Loads established during the PJM Five Peaks in a summer and (ii) the corresponding Load Drop Estimates for such PJM Five Peaks.
- b) **Average ComEd Peak Load:** the average of the five (5) ComEd Zonal Loads established during the ComEd Five Peaks in a summer.
- c) **Average Customer Coincident Peak Load:** the average of the sum of the (i) five (5) customer loads established during the PJM Five Peaks in a summer and (ii) the corresponding Load Drop Estimates for such customer, with such sum adjusted to include applicable distribution and transmission system losses.
- d) **Average Customer Peak Load:** the average of the five (5) loads established by the customer during the ComEd Five Peaks in a summer, with such loads adjusted to include applicable distribution and transmission system losses.

- e) **ComEd Five Peaks:** the five hours occurring on different calendar days in a summer during which the electric system served by ComEd experiences its five highest daily summer demands.
- f) **ComEd Weather Normalized Peak Load:** the expected ComEd Zonal Load at the time of the PJM system peak load in a summer under normal weather conditions as determined by PJM.
- g) **ComEd Peak Load:** the highest ComEd Zonal Load established for PJM network service in a summer.
- h) **ComEd Zonal Load:** the demand for electricity placed upon the interconnected electricity system operated by PJM that is attributable to customers located in the ComEd Zone.
- i) **Load Drop Estimate:** the kilowatt (kW) value attributable to curtailed demand as determined by PJM.
- j) **PJM Five Peaks:** the five hours occurring on different calendar days in a summer during which the electric system served by PJM experiences its five highest daily summer demands.
- k) **Summer:** the period beginning June 1 and extending through September 30 in a calendar year.

Section 3 DETERMINATION OF THE CAPACITY PEAK LOAD CONTRIBUTION

If a customer's Average Customer Coincident Peak Load for Year Y is greater than or equal to such customer's Average Customer Peak Load for Year Y, then such customer's capacity peak load contribution (CPLC) for year Y+1 is equal to such customer's Average Customer Coincident Peak Load for Year Y.

If a customer's Average Customer Coincident Peak Load for Year Y is less than such customer's Average Customer Peak Load for Year Y, then such customer's CPLC for year Y+1 is determined in accordance with the following equation:

$$CPLC_{Y+1} = ACustCPL_Y + (ComEdNPL_Y - AComEdCPL_Y) \times \frac{ACustPL_Y - ACustCPL_Y}{\sum_{5Pc} (ACustPL_Y - ACustCPL_Y)}$$

Where:

CPLC_{Y+1} = Capacity Peak Load Contribution for the customer, in kW, applicable for the period beginning with June in Year Y+1 and extending through May in Year Y+2.

ACustCPL_Y = Average Customer Coincident Peak Load for the customer for Year Y, in kW.

ACustPL_Y = Average Customer Peak Load for the customer for Year Y, in kW.

ComEdNPL_Y = ComEd Weather Normalized Peak Load for Year Y, in kW.

AComEdCPL_Y = Average ComEd Coincident Peak Load for Year Y, in kW.

\sum_{5Pc} = Summation over all customers for which the Average Customer Coincident Peak Load for Year Y is less than the Average Customer Peak Load for Year Y.

Notwithstanding the previous provisions describing the determination of the CPLC_{Y+1}, for certain situations ComEd determines a customer's CPLC_{Y+1} to be equal to (i) the average CPLC_{Y+1} attributable to the delivery class applicable to such customer or (ii) the average CPLC_{Y+1} attributable to the delivery class applicable to such customer scaled to reflect the amount of electricity delivered to such customer. Delivery classes are as described in the General Terms and Conditions of ComEd's Schedule of Rates filed with the Illinois Commerce Commission (Ill. C.C. No. 10).

Section 4 DETERMINATION OF THE NETWORK SERVICE PEAK LOAD CONTRIBUTION

A customer's Network Service Peak Load Contribution (NSPLC) for Year Y+1 is determined in accordance with the following equation:

$$NSPLC_{Y+1} = ACustPL_Y \times \frac{ComEdPL_Y}{\sum_{Ac} ACustPL_Y}$$

Where:

NSPLC_{Y+1} = Network Service Peak Load Contribution for the customer, in kW, applicable for the period beginning with January in Year Y+1 and extending through December in Year Y+1.

ComEdPL_Y = ComEd Peak Load for Year Y, in kW.

\sum_{Ac} = Summation over all customers.

Notwithstanding the previous provisions describing the determination of the NSPLC_{Y+1}, for certain situations ComEd determines a customer's NSPLC_{Y+1} to be equal to (i) the average NSPLC_{Y+1} attributable to the delivery class applicable to such customer or (ii) the average NSPLC_{Y+1} attributable to the delivery class applicable to such customer scaled to reflect the amount of electricity delivered to such customer.

Issued By: Craig Glazer Effective: November 2, 2010

Vice President, Federal Government Policy

Issued On: September 3, 2010

CERTIFICATE OF SERVICE

In accordance with 18 C.F.R. § 385.2010(f) (2008), I hereby certify that I have, on this day, served a copy of the foregoing upon representative for PJM, the Illinois Commerce Commission, the Indiana Regulatory Commission. PJM will in turn serve a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM Region by posting this filing electronically.

Dated this 3rd day of September, 2010

/s/ Heather Curlee

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