

ComEd Greenfield Submittal for PJM 2014 Open Window #2

Proposal submitted by:

ComEd

Two Lincoln Center

Oakbrook Terrace, IL 60181

ComEd submits the following greenfield project for consideration in PJM's 2014 RTEP Proposal Window 2. This project is intended to address flowgates LL-28, LL-30, LL-34, LL-40, LL-42, LL-45, LL-61, LL-63, and LL-69 in the PJM 2018 light load analysis.

The project consists of the installation of a new 10.6 mile 138 kV single circuit overhead transmission line from the substation to be built for the O9 / O29 interconnection, named Schauff Road, to ComEd's Rock Falls substation. The new line would be built adjacent to existing line 7411 on separate towers. The right-of-way (ROW) may need to be widened to accommodate the new circuit.

ComEd estimates the total cost of the project to be \$16.1 M which includes all ROW acquisition, substation work, transmission line work, and overheads. We estimate that the project would take 1 year to complete once approved by PJM. However the project may require regulatory approvals that may impact the in-service date.

ComEd seeks to be designated to construct, own, operate, maintain, and finance the proposed project.

ComEd affirms that the pre-qualification submitted to PJM on behalf of Exelon and its affiliates, PJM ID 13-04, reflects ComEd's current qualifications to be eligible for Designated Entity status as defined in the PJM Amended and Restated Operating Agreement in section 1.5.8(a).

Although ComEd is submitting proposals it should be noted that we do not consider the Light Load study results presented by PJM for the ComEd zone in Open Window #2 to be valid and that additional studies are required. Specifically, our concerns are based on the following:

- Previous Light Load Studies performed for years 2014, 2015, 2016, and 2017 did not identify any overloads on these circuits
- Previous interconnection queue studies for Light Load through the “U” queue did not identify these overloads
- Light Load re-tool results sent out for review on October 23, 2014, which included T-143, did not identify any overloads on these circuits.
- The fact that the latest Light Load study shows overloads up to 174% while the previous year study did not show any overload indicates that these simply did not emerge as issues related to normal system growth and expansion
- The location of these overloads is another indicator that these overloads are not attributable to normal system growth. These circuits begin at the terminals of a proposed generator site (not yet built) and are generally located in an area where there is significant new generation in both ComEd and MISO and very little changes in load.

We therefore respectfully propose that PJM suspend all activity related to evaluating any proposals for these facilities in the ComEd zone until PJM performs the analysis and determines the issues driving the overloads. If PJM does indeed validate that they are not attributable to future queued generation either in PJM or in MISO or any modelling anomalies, then PJM should include them in future competitive Open Windows.

Company Evaluation Information

ComEd is pre-qualified as an affiliate of Exelon. Our PJM pre-qualification number is 13-04.

Constructability Information

The proposed 138 kV transmission line would connect Schauff Road, the station that will be built for the O9 / O29 interconnection, to ComEd’s Rock Falls substation. The line would follow the route of existing 138 kV line 7411, which is planned to also connect the two stations, and traverses predominantly farmland for 10.6 miles. One interstate highway crossing would be required. The existing ROW may need to be widened to accommodate the new circuit. Because this will be a new overhead line on newly acquired ROW, ComEd anticipates that there will be public opposition.

Cost Estimate

ComEd estimates that the project will cost a total of \$16.1 M.

Schedule

ComEd expects that construction of the line would take 1 year from the time that PJM approval is received. However the project may require regulatory approvals that may impact the in-service date.

Operating Plan

ComEd plans to operate the new transmission line from its current transmission control center in suburban Chicago. ComEd currently owns and operates 5,628 miles of transmission in northern Illinois from this control center.

ComEd will maintain the new line in accordance with its standard maintenance practices. ComEd maintains spare equipment for emergencies including towers, conductor, circuit breakers, relays, and other equipment.