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Via eTariff

July 30, 2025

Honorable Debbie-Anne Reese  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426-0001

Re: Exelon Corporation  
CWIP Incentive  
Application Docket No.  
ER25-3018-000

Dear Secretary Reese:

Pursuant to sections 205 and 219 of the Federal Power Act (“FPA”),<sup>1</sup> Part 35 of the regulations of the Federal Energy Regulatory Commission (“FERC” or “Commission”),<sup>2</sup> FERC’s policy statement on transmission incentives,<sup>3</sup> and Order No. 679,<sup>4</sup> Exelon Corporation (“Exelon”), on behalf of its affiliate Baltimore Gas and Electric Company (“BGE”), hereby files<sup>5</sup> revised tariff sheets<sup>6</sup> to Attachment H-2A of the PJM Tariff for authorization to recover 100 percent of Construction Work in Progress costs in rate base (“CWIP Incentive”) that are related to the construction of new major baseline wholesale electric transmission projects approved by the PJM

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<sup>1</sup> 16 U.S.C. §§ 824d and 824s.

<sup>2</sup> 18 C.F.R. Pt. 35.

<sup>3</sup> *Promoting Transmission Investment through Pricing Reform*, 141 FERC ¶ 61,129 (2012) (“Incentives Policy Statement”).

<sup>4</sup> *Promoting Transmission Investment through Pricing Reform*, Order No. 679, FERC Stats. & Regs. ¶ 31,222 (2006), Order No. 679-A, FERC Stats. & Regs. ¶ 31,236 (2006), *order on reh’g*, 119 FERC ¶ 61,062 (2007); *see also*, Incentives Policy Statement.

<sup>5</sup> Pursuant to Order No. 714, this filing is submitted by PJM Interconnection, L.L.C. (“PJM”) on behalf of Exelon as part of an XML filing package that conforms with the Commission’s regulations. PJM has agreed to make all filings on behalf of the PJM Transmission Owners to retain administrative control over the PJM Open Access Transmission Tariff (“PJM Tariff”).

<sup>6</sup> The proposed revisions to the tariff sheets are shown in Attachments E and G hereto and the revisions are described by Witness Jason M. B. Manuel in his testimony appended hereto. *See* Attachment B, Prepared Direct Testimony of Jason M. B. Manuel on Behalf of Baltimore Gas and Electric Company, Exhibit No. BGE-5, July 23, 2025 (“Testimony of Manuel”).

Board of Managers (“PJM Board”).<sup>7</sup> The transmission projects have been identified by PJM as needed to maintain reliability primarily as a result of data center load growth forecasted in northern Virginia causing the need for transmission development.<sup>8</sup> Exelon further respectfully requests that the PJM Tariff changes become effective October 1, 2025, with no suspension period or hearing, or alternatively with no more than a nominal suspension period and specifically identified issues, consistent with the Commission’s practice in numerous incentive rate filings by transmission utilities.

### **EXECUTIVE SUMMARY**

The Commission is already familiar with the 2022 Regional Transmission Expansion Plan (“RTEP”) Window 3 project and its importance and benefits, having approved the Abandoned Plant Incentive for it on behalf of BGE and other PJM transmission owner affiliates of Exelon. In reaching its decision, the Commission found that a threshold presumption in favor of incentives and a nexus test is satisfied, as explained further herein.

The Window 3 Project will be built within BGE’s service territory in central Maryland. PJM, the Regional Transmission Organization of which BGE and its Exelon public utility affiliates are members, has designated BGE with specific construction responsibility for the Window 3 Project. PJM also designated other entities, including BGE affiliates Delmarva Power & Light Company (“DPL”), PECO Energy Company (“PECO”), and Potomac Electric Power Company (“Pepco”), with associated project components from 2022 RTEP Window 3. The Window 3 Project is needed to resolve the reliability criteria violations on the PJM transmission system resulting primarily from data center load growth forecasted in northern Virginia.<sup>9</sup>

By this filing, Exelon, on behalf of BGE, is now seeking the CWIP Incentive for the Window 3 Project in addition to the previously approved Abandoned Plant Incentive. A primary

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<sup>7</sup> By order issued April 23, 2024, the Commission granted Exelon’s application on behalf of BGE and three other affiliates for an abandoned plant incentive for the Window 3 Project (“Abandoned Plant Incentive”). *Baltimore Gas & Elec. Co.*, 187 FERC ¶ 61,030 (2024) (“Abandoned Plant Incentive Order”). At the time that the Abandoned Plant Incentive was requested and approved, these four Exelon affiliates had not perceived a cash flow situation or credit agency concern that would warrant a request for the CWIP Incentive. Only BGE among these four affiliates has seen the need to request this additional incentive for reasons explained herein.

<sup>8</sup> As described further herein, the transmission projects have been assigned the following PJM baseline identification numbers: b3800.26, b3800.27, b3800.28, b3800.29, b3800.30, b3800.32, b3800.34, b3800.36, b3800.37, b3800.4, and b3800.41 (collectively the “Window 3 Project” or “Project”).

<sup>9</sup> See PJM Interconnection, L.L.C., *Reliability Analysis Update*, PJM.COM, Oct. 31, 2023, <https://www.pjm.com/-/media/committees-groups/committees/teac/2023/20231031/20231031-item-15---reliability-analysis-update.ashx>; see PJM Interconnection, L.L.C., *Reliability Analysis Update*, PJM.COM, Dec. 5, 2023, <https://www.pjm.com/-/media/committees-groups/committees/teac/2023/20231205/20231205-item-15---reliability-analysis-update-2022-window-3.ashx>; see PJM Interconnection, L.L.C., *Reliability Analysis Update*, at 26, PJM.COM, Jan. 9, 2024, <https://www.pjm.com/-/media/committees-groups/committees/teac/2024/20240109/20240109-item-12---reliabilityanalysis-update.ashx>; see PJM Interconnection, L.L.C., *Reliability Analysis Report 2022 RTEP Window 3*, PJM.COM, Dec. 8, 2023, <https://www.pjm.com/-/media/committeesgroups/committees/teac/2023/20231205/20231205-2022-rtep-window-3-reliability-analysis-report.ashx> (collectively, the “TEAC Materials”).

reason for this additional incentive for BGE is to ease the financial pressures facing BGE because of a credit agency's downward credit watch associated with the financial necessities of the development of the Window 3 Project<sup>10</sup> by providing upfront regulatory certainty, rate stability, and improved cash flow.<sup>11</sup> Further, just this past April, another credit agency issued a credit opinion singling out the Window 3 Project as a strain on BGE's credit metrics, noting that regulatory lag associated with the project could be partially mitigated if BGE is granted the CWIP Incentive.<sup>12</sup> The Window 3 Project qualifies for the rebuttable presumption because it is a PJM-approved RTEP project.

In a separate order, the Commission granted Exelon's prior incentive application, in Docket No. ER24-1313-000, on behalf of BGE, DPL, PECO, and Pepco, for an abandoned plant recovery of 100 percent of prudently incurred costs if their respective project components from the PJM 2022 RTEP Window 3 are abandoned for reasons beyond Exelon companies' control.<sup>13</sup> The Abandoned Plant Incentive and the presently requested CWIP Incentive, now taking into consideration the change in circumstances facing BGE, and viewed as a package, represent a carefully tailored alignment of the risks and challenges of constructing the Window 3 Project for BGE. Therefore, this application satisfies the Commission precedent applying a nexus test between the incentives requested and the associated risks.

## **STATEMENT OF NATURE, REASONS, AND BASIS**

### **1. Applicable Legal Authority**

Section 1241 of the Energy Policy Act of 2005 ("EPAct") added a new Section 219 to the FPA that requires the Commission to provide incentives to, among other things, "allow recovery of all prudently incurred costs necessary to comply with mandatory reliability standards issued pursuant to section 215" and to "provide incentives to each transmission utility . . . that joins a Transmission Organization" and "shall ensure that any costs recoverable pursuant to this subsection may be recovered by such utility through the transmission rates charged by such utility."<sup>14</sup> In Order No. 679, the Commission implemented EPAct Section 1241 and set forth the standards for evaluating requests for incentive transmission rates.<sup>15</sup> Specifically, Order Nos. 679

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<sup>10</sup> The credit agency's downward credit watch is discussed in further detail by Witness Michael J. Cloyd in his testimony appended hereto. *See* Attachment A, Prepared Direct Testimony of Michael J. Cloyd on Behalf of Baltimore Gas and Electric Company, Exhibit No. BGE-1, July 22, 2025 ("Testimony of Cloyd"). The Standard & Poor's report is attached to Witness Cloyd's testimony as Exhibit No. BGE-2.

<sup>11</sup> DPL, PECO, and Pepco, the other three Exelon affiliates designated by PJM to construct 2022 RTEP Window 3 components, are not, at this time, facing the significant credit risks that threatened to ultimately increase costs of borrowing and, therefore, rates to customers. Thus, DPL, PECO, and Pepco are not joining in the instant request.

<sup>12</sup> The credit agency's credit opinion is discussed in further detail by Witness Cloyd in his testimony appended hereto. The Moody's report is attached to Witness Cloyd's testimony as Exhibit No. BGE-3.

<sup>13</sup> *See* Abandoned Plant Incentive Order, *supra* n.7.

<sup>14</sup> 16 U.S.C. §§ 824s(b)(4)(A) and 824s(c).

<sup>15</sup> Order No. 679; Energy Policy Act of 2005, Pub. L. No. 109-58, 119 Stat. 594 (2005).

and 679-A establish incentive-based rate treatments for transmission of electric energy in interstate commerce by public utilities for the purpose of benefiting consumers by either promoting reliability or reducing the cost of delivered power by reducing transmission congestion. As relevant to this particular filing, Order No. 679 specifically provides for allowing 100 percent of CWIP in rates.<sup>16</sup>

## **2. Summary of CWIP Relief Requested and CWIP-Related Risks Involved**

The Window 3 Project was approved by the PJM Board as part of a comprehensive set of solutions to address a list of criteria violations identified by PJM through its planning studies. The size of the Project represents a considerable commitment of capital, estimated at approximately \$634 million for BGE. The associated financial investments will require BGE to increase debt levels that will add to the aggregate financial burdens faced by BGE, particularly when considered within the context of other major transmission construction determined by PJM to be required for baseline reliability needs. Spending on the Window 3 Project will impose a large financial burden in that it represents an amount equivalent to approximately 25 percent of BGE's entire transmission plant in service for the year ended 2024, thereby significantly increasing financial risks and weakening its coverage ratio and other financial metrics, conditions that can be relieved somewhat should the Commission grant the incremental CWIP Incentive.<sup>17</sup>

Allowing the CWIP Incentive will also lead to benefits for customers in PJM.<sup>18</sup> It will result in better rate stability for consumers by spreading the rate impact of the Window 3 Project over the entire construction period and will thereby avoid the sudden increase in rates (sometimes referred to as "rate shock") that would be experienced should such a large project be placed into rates all at once. Customers also benefit from the use of CWIP treatment over the life of a project because the ultimate project cost reflected in rate base ends up being lower than if a utility used Allowance for Funds Used During Construction ("AFUDC") treatment. Finally, granting this CWIP Incentive will further benefit consumers by permitting Exelon to finance the Window 3 Project, as well as future investments, at equivalent or lower costs.<sup>19</sup>

## **3. Description of the Window 3 Project and Why BGE is Required to Build**

### **A. The Window 3 Project is a PJM Board-approved baseline project.**

The Window 3 Project contains components within the service territory of BGE that are needed to address anticipated constraints and baseline reliability criteria violations based, in large part, on "unprecedented" load growth demand resulting from data center loads in Northern

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<sup>16</sup> Order No. 679, at PP 29 and 117.

<sup>17</sup> Testimony of Cloyd, at 4:10-5:3 & 12:16-13:8.

<sup>18</sup> Testimony of Cloyd, at 16:10-15.

<sup>19</sup> Testimony of Cloyd, at 18:1-19:11.

Virginia, resulting in “high flows” and necessitating “major voltage support.”<sup>20</sup> In February 2023, PJM opened the 2022 RTEP Window 3 in order to develop robust, holistic, and expandable solutions that address 2027/2028 baseline reliability criteria violations associated with local constraints, regional constraints, reactive power needs, and the cumulative impact of generation changes.<sup>21</sup> PJM identified a list of criteria violations through its planning studies and sought solutions to address such criteria violations (collectively, the “Window 3 Needs”). PJM received 72 proposals from 10 entities and evaluated those proposals using a number of specified criteria, including (i) performance; (ii) scalability; (iii) impact; (iv) validated cost; (v) risks; and (iv) efficiencies.<sup>22</sup> PJM ultimately recommended to the PJM Board a comprehensive set of solutions to address the Window 3 Needs that included components of proposals submitted by proposal sponsors.<sup>23</sup> On December 11, 2023, the PJM Board approved the recommended solutions, which included the Window 3 Project that requires the development of certain transmission facilities within the service territory of BGE to address the above-referenced needs.

Specifically, pursuant to its Commission-approved RTEP standards, PJM has designated BGE with eleven components that comprise the Window 3 Project:

1. b3800.26, Build High Ridge 500 kV substation.
2. b3800.27, High Ridge 500 kV substation (cut into Brighton-Waugh Chapel 500 kV line) - Waugh Chapel side.
3. b3800.28, High Ridge 500 kV substation (cut into Brighton-Waugh Chapel 500 kV line) - Brighton side.
4. b3800.29, High Ridge termination for the North Delta-High Ridge 500 kV line.
5. b3800.30, High Ridge - Install two 500/230 kV transformers.
6. b3800.32, Build new North Delta-High Ridge 500 kV line. (~59 miles).
7. b3800.34, Rebuild 5012 (existing Peach Bottom-Conastone) (new Graceton-Conastone) 500 kV line on single circuit structures within existing right-of-way (ROW) and cut into North Delta 500 kV and Graceton 500 kV stations.
8. b3800.36, Rebuild 5012 (existing Peach Bottom-Conastone) (new North Delta-Graceton BGE) 500 kV line on single circuit structures and cut into North Delta 500 kV and Graceton 500 kV stations.

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<sup>20</sup> See PJM Interconnection, L.L.C., *Data Center Planning & Need Assessment Update*, PJM.COM, Jan. 10, 2023, <https://www.pjm.com/-/media/committees-groups/committees/teac/2023/20230110/item-04---data-center-loadplanning.ashx>.

<sup>21</sup> See PJM Interconnection, L.L.C., *PJM RTEP - 2022 RTEP Proposal Window #3, Problem Statement and Requirements*, PJM.COM, <https://www.pjm.com/-/media/planning/rtep-dev/expand-plan-process/fercorder-1000/rtep-proposal-windows/2022-rtep-window-3/2022-rtep-window-3-without-study-files-v7.ashx>.

<sup>22</sup> PJM Interconnection, L.L.C., *Reliability Analysis Update*, PJM.COM, Oct. 3, 2023, <https://www.pjm.com/-/media/committees-groups/committees/teac/2023/20231003/20231003-item-11---reliability-analysis-update.ashx>.

<sup>23</sup> See PJM Interconnection, L.L.C., *Constructability & Financial Analysis Report, 2022 RTEP Window 3*, PJM.COM, Nov. 17, 2023, <https://pjm.com/-/media/committees-groups/committees/teac/2023/20231205/20231205-2022-rtep-window-3-constructability--financial-analysis-report.ashx>. Detailed information about PJM’s findings related to the 2022 RTEP Window 3 results and recommended solution were reported at the October 31, 2023, December 5, 2023, and January 9, 2024, PJM TEAC meetings. See TEAC Materials, *supra* n.9.

9. b3800.37, Replace terminal equipment at Conastone 500 kV - on the (existing Peach Bottom-Conastone) or (new Gracetown-Conastone) 500 kV line.
10. b3800.4, New Otter Creek to Doubs 500 kV line (MD Border-PSEG Demarcation Point). Rebuild and expand existing ~1.6 miles of Otter Creek-Conastone 230 kV line to become double-circuit 500 and 230 kV lines.
11. b3800.41, Conastone-Brighton 500 kV (5011) - Replace terminal equipment at Conastone 500 kV.

On December 29, 2023, PJM notified BGE that it was designated construction responsibility for the Window 3 Project.<sup>24</sup> Exelon accepted the designation on January 26, 2024. On January 7, 2025, BGE and PJM entered into a Designated Entity Agreement (“DEA”) for the Window 3 Project.<sup>25</sup> The Commission accepted the DEA on April 2, 2025.<sup>26</sup> As set forth in Schedule C of the DEA, the required in-service date for baseline project b3800.4 is on or before June 1, 2027, while the in-service date for all other components of the Window 3 Project is on or before December 31, 2030. The initial estimated cost of the Window 3 Project was \$634 million.

**B. Significant risks and obstacles warrant the CWIP relief requested.**

**1. BGE is required to build portions of this project by PJM.**

The Window 3 Project will require that BGE perform design, engineering, environmental, and other studies; procure material and equipment; and execute construction, thus incurring significant costs. As noted, the need for the Window 3 Project has already been determined by PJM under its RTEP protocols and BGE has commenced taking all necessary actions to obtain approval for, and undertake construction and operation of, the Window 3 Project.

As indicated above, PJM has designated BGE with construction responsibility for the Window 3 Project and Exelon has accepted that designation on BGE’s behalf. BGE is obligated under PJM’s RTEP to abide by PJM’s construction responsibility designations by proceeding to secure approvals and take other steps necessary to have the Window 3 Project in place by the PJM designated in-service deadlines.<sup>27</sup>

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<sup>24</sup> See Attachment C.

<sup>25</sup> See PJM Interconnection, L.L.C., *Baltimore Gas and Electric Company (PJM RTEP Projects b3800.26 to 30, b3800.32, b3800.34, b3800.36 to 37, b3800.4 and b3800.41) PJM 2022 Window 3 Recommended Solutions; Service Agreement No. 7481*, Docket No. ER25-1238-000, Attachment A (filed Feb. 6, 2025).

<sup>26</sup> See Letter Order Accepting Designated Entity Agreement, Docket No. ER25-1238-000 (Apr. 2, 2025).

<sup>27</sup> See Amended and Restated Operating Agreement of PJM Interconnection, L.L.C., Schedule 6, Section 1.7(a) (stating, “Transmission Owners designated as the appropriate entities to construct, own and/or finance enhancements or expansions specified in the Regional Transmission Expansion Plan *shall* construct, own and/or finance such facilities.”) (emphasis added).

## 2. There is a rebuttable presumption in favor of this application.

Order No. 679 interprets section 219 to require an applicant seeking incentive transmission rates to demonstrate that the project for which it seeks incentives either promotes reliability or reduces the cost of delivered power by reducing transmission congestion.<sup>28</sup> The Commission established a rebuttable presumption that the threshold section 219 requirement is met if: (1) the transmission project results from a fair and open regional planning process that considers and evaluates projects for reliability and/or congestion; or (2) the transmission project has received construction approval from an appropriate state commission or state siting authority.<sup>29</sup>

Consistent with the Commission's policy, a project (such as the Window 3 Project) satisfies the rebuttable presumption that it will improve reliability and reduce congestion by being approved in the PJM RTEP.<sup>30</sup> The PJM RTEP is a "fair and open regional planning process" that PJM uses to determine whether a project ensures reliability and reduces congestion.<sup>31</sup> The Commission has found that approval through the PJM RTEP process satisfies the rebuttable presumption that the project will improve reliability.<sup>32</sup> Further, the Commission explained that inclusion of projects as PJM RTEP baseline projects<sup>33</sup> "means that PJM made a determination that the projects are regional in nature and mitigate congestion or ensure PJM's ability to continue to serve load reliably."<sup>34</sup> The Window 3 Project is such a project, having been approved by PJM for inclusion in the PJM RTEP as a baseline project.

Indeed, the Commission has already found with respect to the Window 3 Project that it satisfies the rebuttable presumption for transmission incentives because it resulted from the PJM RTEP process. In its order approving the requested Abandoned Plant Incentive, the Commission stated, "[T]he Project is entitled to the rebuttable presumption and meets the requirements of FPA

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<sup>28</sup> Order No. 679 at P 37; Order No. 679-A at P 5.

<sup>29</sup> Order No. 679 at P 58; Order No. 679-A at P 49 (stating that regional planning processes would "in all likelihood" consider such factors).

<sup>30</sup> See *PJM Interconnection, L.L.C.*, 158 FERC ¶ 61,089, at P 19 (2017) (hereinafter "*Transource Order*"); see also *Midcontinent Independent System Operator, Inc.*, 184 FERC ¶ 61,136, at P 16 (2023); see also *GridLiance West LLC*, 184 FERC ¶ 61,129, at P 11 (2023).

<sup>31</sup> *PJM Interconnection, L.L.C.*, 133 FERC ¶ 61,273, at P 41 (2010); see also *PJM Interconnection, L.L.C.*, 133 FERC ¶ 61,273, at P 41 (finding that the projects qualify for a rebuttable presumption because "[e]ach project was vetted and approved as part of PJM's 2009 RTEP as a baseline project"); see also *Pub. Serv. Elec. & Gas Co.*, 129 FERC ¶ 61,300, at P 22 (2009) (a baseline project included in the PJM RTEP "that the Commission has consistently found to be fair and open" satisfies the rebuttable presumption) (internal citation omitted); *Baltimore Gas & Elec. Co.*, 120 FERC ¶ 61,084, at P 41 (2007), *reh'g order*, 122 FERC ¶ 61,034 (2008).

<sup>32</sup> See e.g., *Baltimore Gas & Elec. Co.*, 120 FERC ¶ 61,084, at P 41.

<sup>33</sup> "Projects that are identified as 'baseline' projects in the PJM RTEP process are those that benefit customers in one or more transmission owner zones for the purpose of maintaining reliability or mitigating congestion on the PJM grid." *Potomac-Appalachian Transmission Highland L.L.C.*, 122 FERC ¶ 61,188, at P 29 (2008).

<sup>34</sup> *Baltimore Gas & Elec. Co.*, 120 FERC ¶ 61,084, at P 41.

section 219.”<sup>35</sup> Accordingly, in making this incremental incentive request, there remains a rebuttable presumption to be applied in favor of the application because PJM’s entire RTEP process, by which the Window 3 Project was approved as a baseline project, meets the standard set for such a rebuttable presumption.

### **3. There is a nexus between the total package of incentives and the investment.**

Order No. 679’s “nexus test” requires showing “some nexus between the incentives being sought and the investment being made . . . .”<sup>36</sup> The Commission has also stated that there must be a nexus between the “total package of incentives requested” and the Commission will approve “multiple rate incentives for particular projects as long as each incentive satisfies the nexus test.”<sup>37</sup> The package of incentives for the Window 3 Project is being requested in two parts, with the CWIP Incentive sought here coming after the request for, and grant of, the Abandoned Plant Incentive. While the Abandoned Plant Incentive is currently effective prospective from the date of issuance of that order and need not be addressed again, the CWIP Incentive is justified nonetheless, even taking that prior incentive approval into account.

This request for the CWIP Incentive—incremental to the Abandoned Plant Incentive—will still result in a package of incentives for the Window 3 Project that satisfies the nexus test. As part of its examination of any package of incentives, the Commission has identified several relevant factors it may consider in reaching that decision, including: (i) the scope of the project, (ii) the effect of the project, and (iii) the challenge or risk facing the project.<sup>38</sup> In granting the Abandoned Plant Incentive for the Window 3 Project, the Commission found the Exelon Companies adequately demonstrated a proper nexus between the risks of project failure for reasons beyond their control and the Abandoned Plant Incentive, and granted that request, to wit: “Exelon has demonstrated a nexus between its requested incentive and its planned investment and . . . tailored its incentive request to its identification of risks and challenges associated with the Project.”<sup>39</sup> The circumstances that led to the approval for the Abandoned Plant Incentive remain unchanged.

Here, as demonstrated below, the Window 3 Project *also* satisfies the Commission’s nexus test for the requested CWIP Incentive, including when considered together with the Abandoned Plant Incentive.<sup>40</sup> The scope and effect of, and challenges faced by, the Window 3 Project in terms of financing and credit ratings warrant granting this CWIP Incentive, which is appropriately

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<sup>35</sup> *Baltimore Gas & Elec. Co.*, 187 FERC ¶ 61,030, at P 13.

<sup>36</sup> Order No. 679, 116 FERC ¶ 61,057 at P 48.

<sup>37</sup> *Transource Order*, at P 20; *see also* Order No. 679-A, at P 40.

<sup>38</sup> While the *Incentive Policy Statement* at P 10 explains that the Commission will “re-frame its application of the nexus test” to “no longer rely on the routine/non-routine analysis,” the Window 3 Project meets the criteria for being “non-routine” in that it is fraught with “regulatory and political risks” and “other impediments” to approval as explained herein. *Baltimore Gas & Elec. Co.*, 120 FERC ¶ 61,084, at n.53.

<sup>39</sup> *Baltimore Gas & Elec. Co.*, 187 FERC ¶ 61,030, at P 21.

<sup>40</sup> The CWIP Incentive requested herein is requested in addition to the previously granted Abandoned Plant Incentive for the risk of project failure as previously determined by the Commission. *See id.*

tailored to address these issues. The CWIP Incentive is intended to address an immediate, clear, and present risk of credit ratings decreases with adverse financing costs to the detriment of both BGE and its ratepayers. The CWIP Incentive serves a different purpose from the Abandoned Plant Incentive, and neither incentive treatment detracts from the altogether distinct need and purpose of the other. Because the risks to be mitigated by these separate incentives are different, the CWIP Incentive is appropriately and narrowly tailored to meet financing and credit rating challenges altogether separate and apart from the project failure risks for which the Abandoned Plant Incentive was already granted. Thus, the total package of incentives that would result from the granting of the CWIP Incentive for the Window 3 Project, as incremental to Abandoned Plant Incentive, satisfies the nexus test.

**4. The Window 3 Project imposes significant capital expenditures prior to in-service rate recovery opportunities that can adversely affect credit ratings and cash flows as well as investments in other needed reliability projects.**

As explained in the accompanying testimony of Witness Michael J. Cloyd, the Window 3 Project is a substantial investment, requiring estimated expenditures by BGE of \$634 million, whereas BGE's total transmission gross plant stands at approximately \$2.7 billion as of 2024.<sup>41</sup> This significant expenditure will increase BGE's need to incur debt and impose additional burdens on BGE's overall liquidity position.<sup>42</sup> The risks of project failure are compounded by these increased financial demands if they are not eased by the CWIP Incentive prior to the plant going into service, with a concomitant price spike that can be averted by the spreading of costs through recovery of CWIP in rate base.<sup>43</sup> The risks associated with the Window 3 Project are recognized by the rating agencies and have already resulted in a negative credit watch being placed on BGE, as explained by Witness Cloyd.<sup>44</sup>

Witness Cloyd further explains that credit quality and ratings are buttressed with the CWIP Incentive, and monies are more freely available to meet other construction obligations on BGE as a PJM transmission owner.<sup>45</sup> There are mutual customer and utility benefits with inclusion of 100 percent of CWIP in rate base by enhancing cash flow. BGE typically capitalizes the costs to finance construction expenditures in an account for AFUDC and then depreciates them over the useful life of the facilities.<sup>46</sup> In those situations, however, BGE's cost recovery is deferred until the project is placed in service. Given that the Window 3 Project will be built over an approximately five-year period, use of AFUDC accounting over the entire construction period of

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<sup>41</sup> Testimony of Cloyd, at 4:10-12.

<sup>42</sup> Testimony of Cloyd, at 9:12-10:5.

<sup>43</sup> Testimony of Cloyd, at 12:16-13:8.

<sup>44</sup> Testimony of Cloyd, at 10:6-24.

<sup>45</sup> Testimony of Cloyd, at 16:1-8.

<sup>46</sup> Testimony of Cloyd, at 6:21-7:4. Witness Manuel explains in his testimony that simultaneously upon the effectiveness of the CWIP Incentive, AFUDC will be discontinued for the Window 3 Project, thus eliminating any risk of double recovery of BGE's financing costs of construction for the Window 3 Project. Testimony of Manuel, at 8:10-9:15.

the project would mean a multi-year delay until BGE begins to fully recover those financing costs, which would hurt cash flows and lower credit metrics until the Window 3 Project is fully placed in service. Furthermore, BGE would have to raise additional cash to pay the financing costs associated with the capital expenditures of the Window 3 Project during the construction period, and those costs would ultimately be added to the rate base. In light of these considerations, customers will pay \$100 to \$250 million less over the life of the Project if the Commission authorizes the CWIP Incentive.<sup>47</sup>

By contrast with AFUDC treatment, the CWIP Incentive will allow BGE to recover the costs to finance the Window 3 Project immediately as incurred.<sup>48</sup> CWIP in rate base, which the Commission has regularly granted in cases involving significant RTO-directed projects like the Window 3 Project, is the regulatory certainty that assures lenders that there will be a stream of cash available to service the cost component (*i.e.*, increase) of the debt over the period prior to the Window 3 Project being placed in service. Thus, as recognized by the Commission, CWIP Incentive treatment serves as a useful tool to ease financial pressures associated with transmission development by providing up-front regulatory certainty, rate stability, and improved cash flow, which in turn can result in higher credit ratings and lower capital costs as compared to AFUDC accounting.<sup>49</sup> Approving the CWIP Incentive will help to mitigate the Window 3 Project's negative impact on Exelon's credit metrics. Better credit metrics make for better credit ratings. Better credit ratings mean that debt investors will require a lower interest rate on debt issuances. Lower interest rates lead to lower interest expense which, most importantly, leads to lower customer rates as the financing costs that must be recovered are lower.

With respect to the risks faced by BGE in the context of the Window 3 Project, those risks are project specific. Accordingly, the Abandoned Plant Incentive previously approved for BGE along with this additional request for the CWIP Incentive for BGE are narrowly focused on the risks of project failure and cash flow impediments, thus demonstrating that this limited request is fully justified and should be granted. In other words, the nexus is clearly drawn as the resulting package of relief for the Window 3 Project is "tailored to address the demonstrable risks and challenges" identified above.<sup>50</sup>

### **IDENTIFICATION OF APPLICANT**

This filing is being submitted by Exelon, a utility services holding company with operations and business activities in five states and the District of Columbia, on behalf of BGE, an indirect subsidiary. Exelon is a publicly held corporation incorporated in Pennsylvania, with its principal headquarters located in Chicago, Illinois.

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<sup>47</sup> Testimony of Cloyd, at 18:3-4.

<sup>48</sup> Testimony of Cloyd, at 12:16-13:8.

<sup>49</sup> See *PPL Elec. Utilities Corp. and Public Service Elec. and Gas Co.*, 123 FERC ¶ 61,068, at PP 42-43 (2008); *PJM Interconnection, L.L.C., and Public Service Elec. and Gas Co.*, 147 FERC ¶ 61,142, at P 26 (2014).

<sup>50</sup> Order No. 679-A at P 48. See also Order No. 679 at P 26.

BGE is an energy delivery company in Central Maryland, where it delivers energy to more than 1.3 million electric customers and 700,000 natural gas customers. BGE is regulated by this Commission and the Maryland Public Service Commission. BGE maintains over 27,000 circuit miles of distribution lines and over 1,300 circuit miles of transmission lines in a 2,300-square-mile service territory. BGE provides unbundled, open access delivery service, and is a default load-serving provider for customers that do not opt for alternative energy providers under BGE's retail customer choice program.

### **ADVANCED TECHNOLOGY STATEMENT**

Exelon plans to use optical ground wires ("OPGW"), micro-processor based protective relays, digital fault recorders, advanced transmission conductors, and gas insulated substations ("GIS"), which together will enhance the reliability and resilience of the Window 3 Project. Exelon will emphasize good utility practice and efficient engineering design and construction practices in developing the Window 3 Project.

### **REQUESTED EFFECTIVE DATE AND WAIVERS**

Exelon respectfully requests that the Commission issue an order that authorizes the requested CWIP Incentive and tariff modifications effective October 1, 2025. Exelon requests a waiver of any applicable requirement of the Commission regulations and rules as may be necessary for the Commission to accept and make effective the incentive requested herein. Prompt Commission action is appropriate here because BGE is expending costs in the development of the Window 3 Project and will be substantially increasing its investment soon, thus causing it to be increasingly at risk for a credit downgrade absent the grant of this CWIP Incentive request.

### **ADDITIONAL SUPPORTING MATERIAL**

Exelon submits the following additional information in substantial compliance with relevant provisions of Section 35.13:

#### **I. Contents of this Filing – Section 35.13(b)(1)**

This filing consists of the following documents:

- The instant Transmittal Letter;
- Attachment A: Prepared Direct Testimony of Michael J. Cloyd with accompanying exhibits;
- Attachment B: Prepared Direct Testimony of Jason M. B. Manuel with accompanying exhibit;
- Attachment C: PJM Designated Entity Letter to BGE;

- Attachment D: BGE Attachment H-2A, Part IA to PJM Tariff (clean);<sup>51</sup>
- Attachment E: BGE Attachment H-2A, Part IA to PJM Tariff (marked);
- Attachment F: BGE Attachment H-2A, Part II to PJM Tariff (clean); and
- Attachment G: BGE Attachment H-2A, Part II to PJM Tariff (marked).

Exelon also submits that there is no need for an evidentiary hearing.

## **II. List of Persons Receiving a Copy of This Filing – Section 35.13(b)(3)**

On behalf of BGE, PJM has served 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. In accordance with the Commission's regulations, PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: <http://www.pjm.com/documents/ferc-manuals/ferc-filings.aspx> with a specific link to the newly-filed document, and will send an email on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region<sup>52</sup> alerting them that this filing has been made by PJM and is available through the referenced link within 24 hours of the filing. Also, a copy of this filing will be available on the Commission's eLibrary website located at the following link: <http://www.ferc.gov/docs-filing/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.

In addition, a copy of this filing is being served by BGE on representatives of the Maryland Public Service Commission and the Maryland Office of People's Counsel, and is also available for public inspection, during regular business hours, in a convenient form and place, at the offices of BGE.

## **MISCELLANEOUS**

No agreement is required by contract for the filing of this rate application. There are no costs included in this filing that have been alleged or adjudged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs, nor has any expense or cost been demonstrated to be the product of discriminatory or employment practices, within the meaning of Section 35.13(d)(3).

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<sup>51</sup> In Docket No. ER24-754, BGE created a new Attachment H-2A, Part IIB that solely covers the BGE depreciation rates. After the Commission acts on this application for the CWIP Incentive in the instant docket, BGE will make a clean-up filing to rename Attachment H-2A, Part II to Attachment H2-A, Part IIA and will remove pages of Attachment H-2A, Part IIA that overlap with Attachment H-2A, Part IIB.

<sup>52</sup> PJM already maintains, updates, and regularly uses e-mail for all PJM members and affected state commissions.

**NOTICE AND CORRESPONDENCE**

Exelon requests that all communications regarding this filing be directed to the individuals listed below and that their names be entered on the official service list maintained by the Secretary for this proceeding:

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**CONCLUSION**

For all the reasons set forth herein, Exelon respectfully requests that the Commission grant the CWIP Incentive to BGE associated with the Window 3 Project.

Very truly yours,

/s/ Alejandro Bautista  
Alejandro Bautista  
Assistant General Counsel  
*Attorney for Exelon and BGE*

## ATTACHMENT A

**UNITED STATES OF AMERICA**  
**BEFORE THE**  
**FEDERAL ENERGY REGULATORY COMMISSION**

**PREPARED DIRECT TESTIMONY OF**  
**MICHAEL J. CLOYD**  
**ON BEHALF OF BALTIMORE GAS AND ELECTRIC COMPANY**

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**LIST OF SPONSORED EXHIBITS**

Exhibit No. BGE-2	BGE Credit Report- S&P- March 2024
Exhibit No. BGE-3	BGE Credit Report- Moody's- April 2025
Exhibit No. BGE-4	Illustrative Model - CWIP in Rate Base- Customer Impact

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

PREPARED DIRECT TESTIMONY OF  
MICHAEL J. CLOYD  
ON BEHALF OF BALTIMORE GAS AND ELECTRIC COMPANY

1    **I.    INTRODUCTION**

2    **Q1.    Please state your name, position, and responsibilities.**

3    A1.    My name is Michael J. Cloyd. I am the Chief Financial Officer and Treasurer of Baltimore  
4           Gas and Electric Company (“BGE” or “the Company”). My current responsibilities  
5           include managing the financial condition of BGE and employing financial policies that  
6           maintain the financial health of the utility, enabling the Company to obtain the capital  
7           necessary to continue providing safe and reliable service as well as maintain an appropriate  
8           capital structure. In my capacity as Chief Financial Officer, I have oversight of BGE’s  
9           accounting, financial reporting, financial planning, tax, and budgeting functions as well as  
10          BGE’s internal financial control structure. As Treasurer, I am responsible for managing  
11          BGE’s relationship with the financial community as well as the credit rating agencies.

12   **Q2.    Please summarize your business experience and educational background.**

13   A2.    I hold a Bachelor of Science Degree from the United States Naval Academy and a Master  
14          of Business Administration from Carnegie Mellon University. I have been employed by  
15          BGE in my current role for over one year. I have been with Exelon Corporation (“Exelon”)  
16          (including time with Constellation Energy Corporation prior to the merger with Exelon)  
17          for over 20 years prior to assuming my current position, with half of that time spent in  
18          various positions of increasing responsibility at BGE in Finance, Regulatory, and Support

1 Services, which included Safety, Fleet, Training, Real Estate and Facilities, Security, and  
2 Environmental. Prior to that, I held various finance positions over five years with Corning  
3 Incorporated, and before that I served five years active duty in the United States Navy as a  
4 Supply Corps Officer.

5 **Q3. Have you ever been admitted as an expert witness in any regulatory proceeding?**

6 A3. Yes. I have provided expert witness testimony in base rate proceedings before the  
7 Maryland Public Service Commission, including Case Nos. 9299 and 9326.

8 **Q4. What is the purpose of your Testimony?**

9 A4. My testimony is offered on behalf of BGE in support of its request for approval to modify  
10 its tariff to provide for recovery of 100 percent of Construction Work in Progress  
11 (“CWIP”)<sup>1</sup> costs in rate base (“CWIP Incentive”) that are related to the construction of a  
12 new FERC-jurisdictional and PJM Board of Managers (“PJM Board”)-approved major  
13 baseline wholesale electric transmission project from 2022 Regional Transmission  
14 Expansion Plan Window 3 (“Window 3 Project”). My testimony consists of five primary  
15 areas of focus. First, I will briefly describe the Window 3 Project, highlighting its unique  
16 and challenging attributes. Second, I will explain the utility capital investment cycle,  
17 related cost recovery, and associated financial challenges. Third, I provide background on  
18 the role of rating agencies and how the agencies assess creditworthiness. Fourth, I will  
19 highlight the financial challenges presented by the Window 3 Project and how the CWIP

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<sup>1</sup> FERC Account 107, Construction Work in Progress, includes the accumulation of capital expenditures while an asset is being constructed and before it is used and useful. For example, if an asset has incurred \$20 million in annual expenditures for three years, the CWIP balance is \$60 million at the end of year 3. If the asset goes into service at the beginning of year 4, the \$60 million CWIP balance is cleared, and the asset is transferred into the plant in service account.

Incentive addresses these challenges.<sup>2</sup> Fifth, I will address the impact of the CWIP Incentive on wholesale transmission customers.

**Q5. Do you sponsor any exhibits?**

A5. Yes. In addition to my Testimony, I am sponsoring the following exhibits: 1) Exhibit BGE-2, which is Standard and Poor's Global Ratings ("S&P's) Research Update on BGE issued on March 26, 2024; 2) Exhibit BGE-3, which is Moody's Credit Opinion on BGE issued on April 24, 2025; and 3) BGE-4, which is an example showing the impact of the CWIP Incentive on wholesale transmission customers, compared to the accrual and subsequent recovery of allowance for funds used during construction ("AFUDC").

**II. BACKGROUND – THE WINDOW 3 PROJECT**

**Q6. Please briefly describe the Window 3 Project.**

A6. As described in BGE's transmittal letter to its application, the Window 3 Project is a new FERC-jurisdictional and PJM Board-approved major baseline wholesale electric transmission project. The Window 3 Project will be built within BGE's service territory in central Maryland. The Window 3 Project is needed to maintain transmission system reliability following the identification of reliability violations stemming largely from data center load growth forecasted in northern Virginia.

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<sup>2</sup> Addressed in sections V and VI of this testimony.

1 **Q7. What, if anything, is particularly significant about the Window 3 Project to be non-**  
2 **routine in nature?**

3 A7. The Window 3 Project is the first new 500kV transmission circuit BGE has constructed in  
4 at least the last thirty years<sup>3</sup> and, as noted above, is the solution maintaining transmission  
5 system reliability while serving the significant load growth forecasted in northern Virginia.  
6 Another unique aspect of the Window 3 Project is the construction period: the Window 3  
7 Project assets are not expected to be fully placed in service until December 2030, nearly  
8 five and a half years from the date of this filing.<sup>4</sup> Most importantly, from my standpoint,  
9 is the cost of the project, estimated to be \$634 million.<sup>5</sup>

10 **Q8. Is an estimated \$634 million investment in transmission assets significant for BGE?**

11 A8. Absolutely. Let me place this amount in perspective: at year-end 2024, BGE's  
12 transmission gross plant was \$2.7 billion.<sup>6</sup> Note that this year-end gross plant total  
13 represents the cost of *all* BGE transmission plant providing utility service on December  
14 31, 2024. The Window 3 Project alone has an estimated cost of \$634 million, an amount

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<sup>3</sup> BGE's internal accounting records indicate that the last significant 500kV plant addition occurred in 1994. BGE has also been assigned construction responsibility for the Brandon Shores Project, which also requires 500kV plant additions.

<sup>4</sup> As set forth in Schedule C of the applicable Designated Entity Agreement, the required in-service date for baseline project b3800.4 is on or before June 1, 2027, while the in-service date for all other components of the Window 3 Project is on or before December 31, 2030. *See* PJM Interconnection, L.L.C., *Baltimore Gas and Electric Company (PJM RTEP Projects b3800.26 to 30, b3800.32, b3800.34, b3800.36 to 37, b3800.4 and b3800.41) PJM 2022 Window 3 Recommended Solutions; Service Agreement No. 7481*, Docket No. ER25-1238-000, Attachment A (filed Feb. 6, 2025).

<sup>5</sup> *See* Transmittal Letter, Attachment C. The sum of the cost estimates shown total approximately \$634 million. The \$634 million cost estimate is also included in PJM's Transmission Cost Planner, accessible at the following: <https://www.pjm.com/planning/m/project-construction>. The noted cost estimate is not inclusive of all indirect overheads (including AFUDC) and is subject to change as more refined engineering estimates become available.

<sup>6</sup> Baltimore Gas & Elec. Co., *FERC Form 1: Annual Report of Major Electric Utilities, Licensees and Others and Supplements Form 3-Q: Quarterly Financial Report (End of 2024/Q4)*, at 204-207, line 58, column g (filed Mar. 27, 2025).

1 that represents nearly 25 percent of all BGE plant on the books at year-end 2024.<sup>7</sup> Suffice  
2 it to say, the Window 3 Project represents a significant financial commitment for a utility  
3 the size of BGE.

4 **III. UTILITY COST RECOVERY CONCEPTS**

5 **Q9. What is the first phase in the utility capital investment cycle?**

6 A9. The first phase in the utility investment cycle is what I will refer to as the construction  
7 phase. During the construction phase, costs are incurred but there is no cash recovery from  
8 customers because the assets are still being built and are not deemed “used and useful” in  
9 the provision of utility service. During the construction phase, the utility needs cash from  
10 its debt and equity investors to pay contractors and employees, purchase materials, and  
11 settle other costs associated with the project. Under Generally Accepted Accounting  
12 Principles (“GAAP”) and the FERC Uniform System of Accounts (“USofA”), utilities are  
13 allowed to accrue AFUDC during the construction phase.<sup>8</sup> AFUDC is a capitalization of  
14 financing costs incurred while assets are under construction. Note that, during the  
15 construction phase, AFUDC is only accrued and not recovered from customers. The key  
16 points to recognize are that, while assets are under construction: 1) debt and equity  
17 investors must provide all the cash needed to make the assets “used and useful;” and 2)  
18 while the cost associated with this financing is accrued during the construction phase on  
19 the utility’s books, there is no related cash recovery at this point in the investment cycle.

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<sup>7</sup> Estimated \$634 million costs for Window 3 Project / \$2.7 billion total transmission gross plant at 12/31/24 = 23.4%.

<sup>8</sup> Under GAAP accounting, interest can be capitalized into property, plant, and equipment in certain instances (FASB Codification, ASC 835). FERC’s USofA accounting regulations make provision for AFUDC, which includes both a debt component and an equity component. See 18 C.F.R. Pt. 101, Appendix B (electric plant instruction 3.A.17.a.).

**Q10. Why is AFUDC only accrued during the construction phase?**

A10. AFUDC is only accrued (and not recovered from customers) during the construction phase because the assets are not yet used and useful in the provision of utility service. While I do support this traditional utility ratemaking principle in most instances, under certain specific conditions the Commission authorizes an alternative ratemaking framework (as developed further in the remainder of my testimony) to preserve the financial health of the utility, which ultimately inures to the benefit of customers.

**Q11. What is the second phase in the utility capital investment cycle?**

A11. The second phase in the utility investment cycle is what I will refer to as the used and useful phase. The used and useful phase commences when the assets are placed in service and are used and useful in the provision of utility service. It is at this point that the utility typically includes the investments in rate base and depreciation commences. The inclusion of the net book value in rate base and the inclusion of depreciation in cost-of-service initiates “recovery on” and “recovery of” the assets which are now providing utility service. Depreciation expense is how the utility effectuates capital recovery from customers and the inclusion of the net book value in rate base is how investors are compensated in cash for the financing they have provided and are providing. A final note on the used and useful phase is that investor financing must continue over the estimated useful life of the assets since the total amount of the investment does not get fully recovered until the investment is fully depreciated.

**Q12. How does AFUDC figure into the used and useful phase?**

A12. As I noted earlier, AFUDC is accrued during the construction phase but not recovered until after an asset is placed in service and included in rate base. During the used and useful

1 phase, AFUDC accruals stop and AFUDC accrued during the construction phase is  
2 recovered via the inclusion of depreciation expense in cost-of-service. Additionally,  
3 AFUDC included in the net book value of the assets and contributing to rate base also  
4 generates “recovery on” revenues for utility investors.

5 **Q13. Are there any challenges inherent in the process described above?**

6 A13. Yes, there are. For costly projects with lengthy construction phases (like the Window 3  
7 Project), the financing burden imposed over the construction phase can significantly strain  
8 a utility’s liquidity. As noted earlier, investors must finance the totality of costs incurred  
9 during the construction phase because there is no recovery from customers until the assets  
10 are used and useful. For a project like the Window 3 Project, which has an estimated cost  
11 of over \$0.6 billion and a construction phase of over five years from the date of this filing,  
12 additional debt and equity will be required to ensure that all the bills get paid. Of course,  
13 additional debt financing means additional interest expense, and interest expense is fixed  
14 in nature with required payment intervals. It goes without saying that parties investing in  
15 utility debt are vitally interested in the ability of the utility to make all required debt  
16 payments.

17 **IV. THE ROLE OF RATING AGENCIES**

18 **Q14. What is a credit rating agency (or “rating agency”)?**

19 A14. A rating agency is an evaluator of creditworthiness. Two of the most significant rating  
20 agencies are S&P and Moody’s.<sup>9</sup> Rating agencies provide debt investors insight into the

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<sup>9</sup> On January 17, 2025, Fitch Ratings issued a press release stating that it has “affirmed and withdrawn the Long-Term Issuer Default Ratings and individual securities ratings of Exelon Corp. (Exelon), Commonwealth Edison Co. (ComEd), PECO Energy Co. (PECO), Baltimore Gas and Electric Co. (BGE), Potomac Electric Power Co. (Pepco), Delmarva Power and Light Co. (DPL), Atlantic City Electric Co. (ACE), and Pepco Holdings LLC (PHI).” This press release is available at the following: <https://www.fitchratings.com/research/corporate-finance/fitch-affirms-withdraws-exelon-corp-subsidaries-ratings-17-01-2025>.

creditworthiness of companies so that investors can decide: 1) whether they want to invest in the company at all; and 2) the interest rate required to compensate investors.

**Q15. What is a credit rating?**

A15. A credit rating is a “grade” issued by the rating agency and this grade is an assessment of the company’s capacity to fulfill its debt obligations on a timely basis. In other words, a credit rating is the rating agency’s assessment of the general creditworthiness of the organization, considering all pertinent risks.

**Q16. How does a company’s credit rating impact its business and financial outlook?**

A16. A company’s credit rating influences the investor community’s perception of the company in general. It also directly affects how robust the market will be when the company issues debt. Importantly, a credit rating also impacts the cost (interest rate) associated with the company’s debt securities. The higher (better) the credit rating, the lower the required interest rate. The lower (worse) the credit rating, the higher the required interest rate.

**Q17. How do rating agencies determine credit ratings?**

A17. Credit metrics, which are computed using the company’s financial information, are the primary inputs into the assigned credit rating. If credit metrics are strong, the credit rating is strong. If credit metrics are weak, the credit rating follows form.

**Q18. Does BGE periodically report its credit metrics to regulators?**

A18. Yes, BGE reports certain credit metrics to the Maryland Public Service Commission (MDPSC) on a quarterly basis. BGE reports the following credit metrics:<sup>10</sup>

- Funds from Operations (FFO) / Debt

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<sup>10</sup> See e.g., Case No. 9173, Phase II – Order No. 82986 and Case No. 9271 – *Order No. 84698 Compliance Filing, Maryland Public Service Commission*, Filing of BGE Equity Ratio and Credit Metrics as of March 31, 2025, filed May 6, 2025, Mail Log #318637, <https://webpscxb.psc.state.md.us/DMS/home>.

- Funds from Operations (FFO) / Interest
- Debt / Capitalization

**Q19. Please summarize the possible S&P and Moody's credit ratings.**

A19. S&P and Moody's credit ratings are summarized in the table below. For S&P, AAA is the best and for Moody's, Aaa is the best.

**Table 1- S&P and Moody's Credit Ratings<sup>11</sup>**

Rating Agency	Investment Grade Ratings	Speculative Ratings
S&P	AAA / AA / A / BBB	BB / B / CCC / CC / C / D
Moody's	Aaa / Aa / A / Baa	Ba / B / Caa / Ca / C

**Q20. Please summarize the current credit ratings of BGE.**

A20. BGE's credit ratings are summarized below.

**Table 2- BGE's Current Credit Ratings**

Rating Agency	Rating <sup>12</sup>
S&P	A
Moody's	A3

**V. THE IMPACT OF THE WINDOW 3 PROJECT**

**Q21. How does the Window 3 Project impact the frameworks discussed above?**

A21. As noted earlier, the Window 3 Project is a critically important capital investment, which is also significantly costly. Considering the traditional utility cost recovery framework described above, the Window 3 Project will necessarily present financing challenges as investors will need to finance 100 percent of the project during the lengthy construction

<sup>11</sup> The S&P ratings shown in the table are available at the following: [www.spglobal.com/ratings/en/about/understanding-credit-ratings](http://www.spglobal.com/ratings/en/about/understanding-credit-ratings). The Moody's ratings shown in the table are available at the following: [https://www.moodys.com/sites/products/productattachments/ap075378\\_1\\_1408\\_ki.pdf](https://www.moodys.com/sites/products/productattachments/ap075378_1_1408_ki.pdf).

<sup>12</sup> Moody's ratings include a numeric designation, which is not shown in the table above. A numeric of 1 indicates the highest credit quality and a numeric of 3 indicates the lowest credit quality. For BGE, therefore, the current credit rating should be viewed as within the least creditworthy "corridor" of the A rating.

phase while there is no cost recovery from customers. Additional debt financing will need to be obtained, and such financing will naturally lead to a higher level of fixed costs for the utility (in the form of interest expense), and pressure will be placed on the key credit metrics, which are determinative of the company's credit ratings. To reiterate a concept from above, if credit ratings deteriorate, the Company's cost to borrow increases.

**Q22. What, if any, impact do the financing considerations of the Window 3 Project and other projects like it have on the ratings made by the rating agencies?**

A22. The ratings agencies recognize the financing challenges of transmission projects, and particularly those presented by the Window 3 Project. As documented in Exhibit No. BGE-2, on March 26, 2024, S&P reaffirmed BGE's rating of A but also assigned BGE a Negative Outlook:

During parent Exelon Corp.'s fourth quarter 2023 earnings call, it was announced that subsidiary utility Baltimore Gas and Electric Co. (BGE) would increase its capital spending toward incremental transmission projects. Because of the incremental capital spending, about a \$900 million increase through 2024-2026, we anticipate BGE's financial measures will weaken. We expect these incremental capital expenditures to be in line with the utility's capital structures authorized by Maryland Public Service Commission and Federal Energy Regulatory Commission (FERC). Therefore, we revised our outlook on BGE to negative from stable. At the same time, we affirmed all ratings on BGE including the 'A' issuer credit rating (ICR), 'A' issue-level rating on the company's unsecured debt, 'BBB+' preference stock rating, and 'A-1' short-term and commercial paper ratings. The negative outlook reflects our expectation that BGE's financial measures will remain weaker given its incremental capital spending and funding through the forecast.<sup>13</sup>

**Q23. What does it mean when S&P places a company on "Negative Outlook?"**

A23. Negative outlook indicates S&P's belief that an adverse credit rating change may occur considering the applicable company's status quo and future prospects. As expressed by

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<sup>13</sup> S&P Global Ratings, Ratings Direct, Research Update on Baltimore Gas and Electric Co., *Outlook Revised to Negative on Increased Capital Spending; Ratings Affirmed*, at 1 (Mar. 26, 2024), [www.capitaliq.spglobal.com/web/client#ratingsdirect/creditResearch?rid=3144405](http://www.capitaliq.spglobal.com/web/client#ratingsdirect/creditResearch?rid=3144405) (emphasis added).

1 S&P, “Standard and Poor’s Ratings Services uses . . . ratings outlooks to indicate its view  
2 regarding the degree of likelihood of a rating change and, in most cases, the probable  
3 direction of that change.”<sup>14</sup>

4 **Q24. Has S&P updated its view of BGE more recently?**

5 A24. Yes, S&P did issue a ratings report in April 2025. In that ratings report, S&P affirmed its  
6 negative outlook, citing “. . . higher capital spending that pressures financial measures and  
7 increases leverage.” The report goes on to specifically cite the adverse impact of  
8 significant capital investments on the FFO to Debt ratio.<sup>15</sup>

9 **Q25. Has Moody’s expressed similar concerns?**

10 A25. Yes, Moody’s recognizes the challenges as well, singling out the Window 3 Project  
11 specifically. As documented in Exhibit No. BGE-3, in April 2025 Moody’s reports recent  
12 affirmation of BGE’s current ratings and also offered the following commentary:

13 Capital expenditures for 2024 were about \$1.6 billion, and the company expects  
14 them to be about \$1.85 billion in 2025 but jump to \$2 billion in 2026 and 2027  
15 driven by the Brandon Shores and the Tri-county<sup>16</sup> transmission projects . . . . We  
16 view capital spending as essential for maintaining customer service and reliability.  
17 Still, it can exacerbate regulatory lag. The lag could be partially mitigated if BGE  
18 is granted construction work in progress (CWIP) in rate base treatment for its Tri-  
19 County project with the heaviest spendings years from 2027 to 2029.<sup>17</sup>

20  
21 **Q26. What conclusion should be drawn from the S&P and Moody’s actions detailed above?**

22 A26. The conclusion to be drawn is that both rating agencies recognize the pressure that  
23 significant transmission spending will place on BGE’s credit metrics, metrics that bear

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<sup>14</sup> Standard & Poor’s Ratings Services, Ratings Direct, *General Criteria: Use of CreditWatch and Outlooks*, at 2 (Sept. 14, 2009), <https://www.capitaliq.spglobal.com/web/client/ratingsdirect/creditResearch?rid=2572636&html=true>.

<sup>15</sup> S&P Global Ratings, Ratings Direct, *Ratings Score Snapshot on Baltimore Gas and Electric Co.*, at 1 (Apr. 4, 2025), <https://www.capitaliq.spglobal.com/web/client/ratingsdirect/creditResearch?rid=3348847>.

<sup>16</sup> The Tri-county reference in the Moody’s credit opinion above is inclusive of the Window 3 Project.

<sup>17</sup> Moody’s Ratings, *Credit Opinion: Baltimore Gas and Electric Company: Update following rating affirmation*, at 5 (Apr. 24, 2025), [https://www.moodys.com/research/docid--PBC\\_1440744](https://www.moodys.com/research/docid--PBC_1440744).

1 directly on BGE's credit ratings. In fact, S&P's concern in this regard triggered a ratings  
2 action, the assignment of a Negative Outlook, which signals the risk of a future credit  
3 ratings downgrade. Debt investors perceive ratings downgrades as increasing their risk,  
4 and for this increase in risk, a higher interest rate will certainly be required. As detailed  
5 below, higher interest expense means higher rates for customers. In its most recent report  
6 on BGE, cited above, Moody's goes so far as to explicitly cite the CWIP Incentive as a  
7 solution to at least partially mitigate the financial pressures exerted by a robust capital  
8 investment program.

9 **VI. INCLUSION OF THE CWIP INCENTIVE TO ADDRESS THESE CONCERNS**

10 **Q27. Is there a change to the recovery framework for the Window 3 Project that would**  
11 **completely eliminate the need for investors to finance this project?**

12 A27. No, there is not. Investors will need to finance this project. BGE cannot recover project  
13 costs in advance, all costs cannot be recovered prior to the assets becoming used and useful,  
14 and capital recovery must occur over the useful life of the assets, amounting to 55-60 years  
15 for assets of the variety being constructed with the scope of the Window 3 Project.<sup>18</sup>

16 **Q28. Is there any change to the recovery framework for the Window 3 Project that would**  
17 **at least mitigate the financial burden on investors?**

18 A28. Yes, there is. The Commission could authorize BGE to include Window 3 Project CWIP  
19 in rate base during the project's construction phase (as noted earlier, the "CWIP  
20 Incentive"). Under this alternative framework, BGE would not accrue AFUDC during the

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<sup>18</sup> See Baltimore Gas and Electric Company, *Settlement Agreement*, at Exhibit C, Docket No. ER24-754-000 (filed Nov. 1, 2024) (informational exhibit describing composition of the following settlement depreciation rates: account 353- Station Equipment- life of 60 years, account 354- Towers and Fixtures- life of 55 years, account 355- Poles and Fixtures- life of 60 years, and account 356- Overhead Conductors and Devices- life of 55 years).

1 construction phase to be subsequently recovered during the used and useful phase.<sup>19</sup> BGE  
2 would instead recover (*i.e.*, cash recovery from customers) on a closer to real-time basis  
3 the financing costs incurred during the construction phase, while the assets are being built.  
4 Given the significant cost and long-lead time of the Window 3 Project and associated  
5 pressure on credit metrics, my opinion is that BGE's request that the Commission (in this  
6 case and for this project) make an exception to the general rule that only used and useful  
7 assets may be recovered in customer rates is warranted by the reactions of these rating  
8 agencies in order to alleviate the adverse impacts on BGE and its customers.

9 **Q29. What is the basis upon which you have formed this opinion? How does including the**  
10 **CWIP Incentive alleviate the financing burden associated with the Window 3**  
11 **Project?**

12 A29. My recommendation stems from the fact that the CWIP Incentive will alleviate the  
13 financing burden associated with the Window 3 Project. The financing burden is mitigated  
14 with the CWIP Incentive because cash related to the "return on" during the construction  
15 phase is being obtained during the construction phase when the dollars are being expended.  
16 Under the AFUDC framework, the "return on" from the construction phase is recovered  
17 after the assets are used and useful and over the useful lives of the assets. Most importantly,  
18 the timelier cash recovery from including CWIP in rate base will improve BGE's credit  
19 metrics, which are the critical inputs into the S&P and Moody's credit ratings discussed  
20 earlier in this testimony.

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<sup>19</sup> Please see the testimony of Company Witness Jason M. B. Manuel for further information on the cessation of AFUDC accruals if the Commission were to authorize the CWIP Incentive for BGE.

**Q30. How, if at all, do the rating agencies regard the CWIP Incentive?**

A30. Rating agencies see the CWIP Incentive as a positive means of enhancing credit support.

For example, in June 2010, Moody's has been quoted as stating:

[T]he inclusion of CWIP in rate base is supportive of utility credit quality. It helps moderate the financial pressure of the incremental construction related debt by providing a cash return during lengthy, sometimes uncertain, and potentially delayed construction periods. It also allows a project's costs to be gradually incorporated into rates rather than all at once at the conclusion of construction, when a large and unpopular one-time rate increase may be required. The resulting rate shock could lead to further delays in the recovery of these costs or political/legislative intervention aimed at limiting or denying utility cost recovery altogether.<sup>20</sup>

S&P has also weighed in on the desirability of the CWIP Incentive, with the published statement that this recovery approach ensures a "more stable cash flow through the construction cycle."<sup>21</sup>

**Q31. Are there any more recent rating agency references?**

A31. Yes, there are. In August 2016 S&P noted in a special report on U.S. investor-owned utilities that, "[a]llowance of a cash return on construction work-in-progress or similar ratemaking methods historically were extraordinary measures for use in unusual circumstances, but when construction costs are rising, cash flow support could be crucial to maintain credit quality through the spending program."<sup>22</sup> Additionally, in June 2017, Moody's stated that its assessment of cost recovery timeliness includes determining

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<sup>20</sup> Moody's Investor Service, *Special Comment: Cost Recovery Provisions Key to Investor-Owned Utility Ratings and Credit Quality*, at 9 (June 18, 2010), [https://www.floridapsc.com/library/filings/2016/07490-2016/Support/296\\_Moodys%20Regulatory%20Frameworks%2006182010.pdf](https://www.floridapsc.com/library/filings/2016/07490-2016/Support/296_Moodys%20Regulatory%20Frameworks%2006182010.pdf).

<sup>21</sup> Standard and Poor's, *Global Credit Portal Ratings Direct: How Returns on Equity Factor into U.S. Utilities' Creditworthiness*, at 4 (June 14, 2005), <https://www.spglobal.com/ratings/en/regulatory/article/-/view/sourceId/3210820>.

<sup>22</sup> Standard and Poor's, *Global Credit Portal Ratings Direct: Assessing U.S. Investor-Owned Utility Regulatory Environments*, (Aug. 10, 2016), at 7, <https://www.spglobal.com/ratings/en/regulatory/article/-/view/sourceId/9678530>.

whether the utility has “the ability to periodically adjust rates for construction work in progress” and its evaluation includes an evaluation of “the lag between the time that a utility incurs a major construction expenditure and the time that the utility will start to recover and/or earn a return on that expenditure.”<sup>23</sup> I will also point out that the Moody’s April 2025 report, cited in Question 25 above, both recognizes the impact of the regulatory lag imposed by heavy capital spending and specifies the CWIP Incentive as a mitigant to this undesirable impact.

**Q32. Has the Commission itself addressed the issue of including CWIP in rate base in certain cases?**

A32. Yes, the Commission well recognizes the benefits of including CWIP in rate base in circumstances such as I have described here facing BGE with the Window 3 Project. Specifically, in its 2012 Policy Statement the Commission asserted the following:

The CWIP and pre-commercial cost incentives both serve as useful tools to ease the financial pressures associated with transmission development by providing up-front regulatory certainty, rate stability and improved cash flow, which in turn can result in higher credit ratings and lower capital costs. Specifically, the CWIP incentive addresses timing issues associated with the recovery of financing costs for large transmission investments and allows recovery of a return on construction costs during the construction period rather than delaying cost recovery until the plant is placed in service. The Commission has also found that allowing companies to include 100 percent of CWIP in rate base would result in greater rate stability for customers by reducing “rate shock” when certain large-scale transmission projects come online.<sup>24</sup>

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<sup>23</sup> Moody’s Investor Service, *Rating Methodology: Regulated Electric and Gas Utilities*, at 13 (June 23, 2017), <https://ratings.moody.com/api/rmc-documents/68547>.

<sup>24</sup> *Promoting Transmission Investment Through Pricing Reform*, 141 FERC ¶ 61,129, at P 12 (2012).

**Q33. What do you conclude from the above?**

A33. The financial pressures exerted by the Window 3 Project on BGE's financial status quo, pressure that is recognized by the rating agencies, can be partially mitigated by the Commission authorizing the CWIP Incentive for the Window 3 Project. Both S&P and Moody's recognize the benefits arising from this rate treatment. The Commission itself has also clearly articulated its belief that, in certain cases, allowing for the CWIP Incentive is desirable in that it addresses the financial risks arising from costly projects with long lead times.

**VII. THE IMPACT ON CUSTOMERS**

**Q34. What, if anything, is the long-term rate impact on customers?**

A34. The CWIP Incentive results in lower recoveries from customers on a nominal basis over the recovery period of the assets. From an economic standpoint, customers are at worst unaffected, regardless of the rate treatment adopted. Simply stated, under the AFUDC model, customers may pay later but over the entire recovery period they pay more, and these impacts, at worst, "net out" in the customer economic analysis.

**Q35. Please further explain your analysis of the impact on customers.**

A35. Exhibit No. BGE-4 is a simple example that illustrates these concepts. Exhibit No. BGE-4 presents recovery analyses for a fictitious investment of \$6 million over three years. The grid titled "Modeling with AFUDC" analyzes this investment assuming the AFUDC cost recovery framework, and the grid titled "Modeling with CWIP in Rate Base" analyzes this investment assuming the CWIP Incentive cost recovery framework.<sup>25</sup> This modeling

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<sup>25</sup> Exhibit No. BGE-4 does not include recovery of certain period costs like O&M and income taxes to simplify the illustration. The inclusion of these costs would not change the point of the analysis, which is that customers are indifferent on an economic basis and "better off" on a nominal basis.

1 assumes a 7 percent rate of return and assumes a 20-year recovery period. Rows L and X  
2 reflect the net present values of the cash flows developed on rows K and W, respectively.<sup>26</sup>  
3 Rows M and Y reflect the nominal values of the cash flows developed on rows K and W,  
4 respectively. Row Z shows the net present value difference and row AA shows the nominal  
5 difference.

6 **Q36. What do you conclude from row Z?**

7 A36. Row Z reflects a value of \$0, which indicates that customers are economically unaffected  
8 under the CWIP Incentive framework under the assumption that the utility rate of return,  
9 AFUDC accrual rate, and discount rate are the same. Considering the above, I conclude  
10 that, on an economic basis as measured by comparing net present values of cash flow  
11 streams, the two alternative methodologies (AFUDC versus CWIP Incentive) are  
12 equivalent from a customer impact standpoint.

13 **Q37. What do you conclude from row AA?**

14 A37. Row AA reflects a value of <\$1 million>, which indicates that customers pay more under  
15 the AFUDC framework on a nominal basis. That is to say: if one does not apply a discount  
16 rate to customer payments, customers ultimately pay more on an absolute basis under the  
17 AFUDC payment. The dynamic driving this variation is the fact that customers pay the  
18 return on the AFUDC accrual over the useful life of the assets during the used and useful  
19 phase, whereas with CWIP treatment they do not.

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<sup>26</sup> The row descriptions cited refer to the leftmost column in Exhibit No. BGE-4.

1 **Q38. Can you quantify the AFUDC framework savings you just described to be realized if**  
2 **the Commission authorizes the CWIP Incentive for the Window 3 Project?**

3 A38. I estimate that customers will pay between \$100 - \$250 million less over the life of the  
4 project if the Commission authorizes the CWIP Incentive.<sup>27</sup> These estimated savings are  
5 of course very significant but, to reiterate from above, on an economic basis customers are  
6 at worst unaffected as the nominal savings are offset in the net present value analysis by  
7 cash recoveries during the construction phase. This conclusion holds as long as one  
8 assumes that the utility rate of return and discount rate are the same. I will note that if the  
9 true discount rate of society in general is lower than the utility rate of return (a reasonable  
10 assumption), customers are economically *better off* under the CWIP Incentive.

11 **Q39. Please elaborate on additional benefits arising from the CWIP Incentive.**

12 A39. The inclusion of CWIP in rate base also promotes rate gradualism. Rate gradualism  
13 recognizes that customers prefer a gradual increase in rates to the level that reflects full  
14 project costs in rate base, as opposed to a “rate shock” scenario that would naturally arise  
15 if a very large project is placed in service and all costs, including accrued AFUDC, are  
16 placed in service and included in rates all at once. Under the CWIP in rate base approach,  
17 the financing costs incurred during the construction phase are recovered during the  
18 construction phase and built up AFUDC accruals are avoided and not included when the  
19 assets are placed in service. I will also point out that the Moody’s 2010 ratings report and  
20 also the 2012 FERC Policy Statement, both cited earlier in this testimony, refer to the  
21 benefits of increased rate gradualism.<sup>28</sup>

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<sup>27</sup> This estimate includes certain simplifying assumptions as regards to the timing of capital expenditures and rate used to accrue AFUDC.

<sup>28</sup> See *infra* at nn.20 & 24.

**Q40. Versus the customer impacts associated with the CWIP Incentive, how would customers be impacted if the rating agencies downgraded BGE?**

A40. If BGE's credit rating is downgraded, higher levels of interest expense will certainly be incurred. These higher levels of interest will impact the Company's income statement and, perhaps most importantly, also increase customer rates as interest expense is a recoverable cost in all utility cost recovery frameworks.<sup>29</sup> These higher levels of interest will increase customer rates on both a nominal and present value basis. I estimate that a ratings downgrade of one notch would result in as much as \$100 million of additional interest expense over the life of the bonds under current market conditions.<sup>30</sup> Simply stated, ratings downgrades lead to higher levels of interest expense, which leads to higher customer rates—it is a certainty.

**VIII. SUMMARY AND CONCLUSION**

**Q41. Please summarize the key points from your testimony.**

A41. Key points from my testimony are as follows:

- The Window 3 Project is a required transmission project of significant scope and cost resulting from the need for transmission to maintain reliability in the face of data center load growth forecasted in northern Virginia.
- Traditional utility cost recovery frameworks, which defer any cost recovery until the assets are used and useful, present financing issues for large and costly projects with long lead times.

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<sup>29</sup> Interest expense is included in customer rates within the Company's rate of return, which is applied to rate base to derive the return on rate base.

<sup>30</sup> The above estimate was prepared using an illustrative estimate of BGE bond issuances over a five-year period.

- 1           ○ The rating agencies, evaluators of corporate creditworthiness, are aware of the  
2           significant cash outlays associated with emergent transmission needs being  
3           developed by BGE and have expressed concern about credit metric sustainability  
4           considering these pressures, with S&P even assigning BGE's current A rating a  
5           Negative Outlook.
- 6           ○ An approach to mitigate these financing pressures and to bolster BGE's credit  
7           metrics is to allow the CWIP Incentive for the Window 3 Project only. S&P,  
8           Moody's, and the Commission itself have all recognized the benefits derived from  
9           the CWIP Incentive as an approach to enhancing utility liquidity in the face of  
10          sizable capital investment obligations.
- 11          ○ Compared to the use of AFUDC, the CWIP Incentive results in lower nominal  
12          recoveries from customers. From an economic standpoint, customers are at worst  
13          unaffected, regardless of the rate treatment adopted.
- 14          ○ In contrast, if the rating agencies downgrade BGE, its cost to borrow would  
15          certainly increase and this increased level of cost would be passed onto customers  
16          in rates. Higher interest expense causes customer rates to be higher, on both a  
17          nominal and economic basis.

18          In light of the above facts, I conclude that the CWIP Incentive addresses the unique risks  
19          and challenges of the Window 3 Project. There is nexus between the incentive being  
20          requested and the specific risks presented by the project. For this reason, I urge the  
21          Commission to approve BGE's filing.

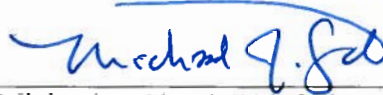
22      **Q42. Does this conclude your testimony?**

23      A42. Yes, it does.

## VERIFICATION

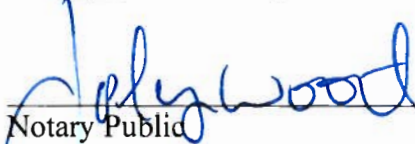
Pursuant to 28 U.S.C. § 1746 (2012), I state under penalty of perjury that the foregoing testimony is true and correct to the best of my knowledge, information, and belief.

Executed this 22<sup>nd</sup> day of July, 2025.

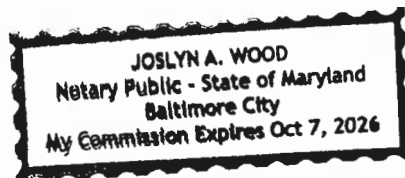


Michael J. Cloyd, Chief Financial Officer, and  
Treasurer  
Baltimore Gas and Electric Company

Subscribed and sworn before me, the undersigned notary public,  
this 22<sup>nd</sup> day of July, 2025.

  
Notary Public

My Commission Expires: October 7, 2026



Research Update:

# Baltimore Gas And Electric Co. Outlook Revised To Negative On Increased Capital Spending; Ratings Affirmed

March 26, 2024

## Rating Action Overview

- During parent Exelon Corp.'s fourth quarter 2023 earnings call, it was announced that subsidiary utility Baltimore Gas and Electric Co. (BGE) would increase its capital spending toward incremental transmission projects.
- Because of the incremental capital spending, about a \$900 million increase through 2024-2026, we anticipate BGE's financial measures will weaken. We expect these incremental capital expenditures to be in line with the utility's capital structures authorized by Maryland Public Service Commission and Federal Energy Regulatory Commission (FERC).
- Therefore, we revised our outlook on BGE to negative from stable. At the same time, we affirmed all ratings on BGE including the 'A' issuer credit rating (ICR), 'A' issue-level rating on the company's unsecured debt, 'BBB+' preference stock rating, and 'A-1' short-term and commercial paper ratings.
- The negative outlook reflects our expectation that BGE's financial measures will remain weaker given its incremental capital spending and funding through the forecast. Specifically, we forecast BGE's S&P Global Ratings-adjusted funds from operations (FFO) to debt will be in the 18%-19% range over the next 24 months, below our downside trigger of 20%.

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## Rating Action Rationale

**The negative outlook on BGE reflects our expectation for its financial measures to weaken due to elevated capital spending and funding.** Given Exelon's announcement of higher capital spending at BGE (\$1.6 billion in 2024, \$2 billion in 2025, \$2.1 billion in 2026 and 2027), we expect the utility's financial measures will remain weak. For 2024-2026, we expect capital spending to average about \$1.8 billion, which is a significant increase from 2023 capital spending at about \$1.4 billion. As such, we expect financial performance will remain pressured for the current rating, reflecting FFO to debt in the range of 18%-19% through 2026.

**Our ratings on BGE reflect our assessment of its business risk profile as excellent.** We assess BGE at the higher half of the business risk profile category range relative to peers, reflecting the company's lower-risk electricity transmission and distribution (T&D) and gas distribution operations. The utility's distribution's multiyear rate plan (MYRP) with forward test periods enhances rate predictability, reduces regulatory lag, and will likely provide a reasonable opportunity to earn its authorized return on equity (ROE). BGE's regulatory construct also benefits from interim rate recovery, specifically through its emPOWER rider for energy efficiency and demand response programs.

BGE has a large customer base of 2 million electric and gas customers, with a reliance on mainly residential customers (90%), which we believe supports cash flow stability. Additionally, BGE's gas operations only account for about 25% of operating revenues, thereby limiting potential long-term exposure to new environmental standards, bans on new connections, or other regulations.

## Outlook

The negative outlook on BGE reflects our expectation that its stand-alone measures will weaken to 18%-19% through 2026.

## Downside scenario

We could lower our rating on BGE in the next 12 months if its stand-alone FFO to debt remains consistently below 20%.

## Upside scenario

We could revise BGE's outlook to stable over the next 12 months if the stand-alone FFO to debt is consistently above 20%, without an increase in business risk.

## Company Description

BGE is a midsize, regulated electricity T&D and natural-gas distribution utility serving about 2 million customers in and around Baltimore, Maryland. BGE contributes about 20% to parent Exelon's EBITDA.

## Our Base-Case Scenario

- Regular MYRP electric and natural gas distribution filings;
- Annual FERC filings for electric transmission under formula rates;
- Continued use of existing regulatory mechanisms such as emPOWER that enhance recoverability of capital spending;
- Annual capital spending in the range of \$1.6 billion-\$2.0 billion through 2026;
- Annual dividends averaging about \$400 million;
- Negative discretionary cash flow, indicating external funding needs; and

**Research Update: Baltimore Gas And Electric Co. Outlook Revised To Negative On Increased Capital Spending; Ratings Affirmed**

- All debt maturities to be refinanced.

**Liquidity**

We base our 'A-1' short-term rating on BGE on its long-term issuer credit rating. As of Dec. 31, 2023, we assess BGE's liquidity as adequate, with sources covering uses by 1.1x over the next 12 months. We believe its sources would cover uses even if forecast EBITDA declines 10%. We believe the predictable regulatory framework for BGE provides a manageable level of cash flow stability for the company even in times of economic stress, supporting our use of slightly lower thresholds to assess liquidity.

In addition, BGE has the ability to absorb high-impact, low-probability events, reflecting that the company maintains about \$600 million in a committed credit facility through February 2027 and our belief that the company can lower its high capital spending (averaging about \$1.8 billion) during stressful periods, indicative of a limited need for refinancing under such conditions.

Furthermore, our assessment reflects the company's generally prudent risk management, sound relationships with its banking group (which includes over 20 well-established banks), and a satisfactory standing in the credit markets. Overall, we believe the company could withstand adverse market circumstances over the next 12 months with sufficient liquidity to meet its obligations.

**Principal liquidity sources**

- Cash and liquid investments of about \$40 million;
- Credit facility availability of about \$600 million; and
- Estimated cash FFO of about \$1.1 billion.

**Principal liquidity uses**

- Debt maturities, including outstanding commercial paper, of about \$165 million;
- Capital spending (maintenance) of about \$1 billion; and
- Dividends of about \$370 million.

**Issue Ratings - Subordination Risk Analysis****Capital structure**

As of Dec. 31, 2023, BGE's capital structure consists of about \$4.6 billion of long-term debt.

**Analytical conclusions**

BGE's senior unsecured debt is rated the same as the ICR because it is unsecured debt of a qualifying investment-grade utility. BGE's preference stock is rated two notches below the ICR, reflecting its structural subordination and the right to defer distributions.

## Ratings Score Snapshot

Issuer Credit Rating: A/Negative/A-1

Business risk: Excellent

- Country risk: Very low
- Industry risk: Very low
- Competitive position: Strong

Financial risk: Significant

- Cash flow/leverage: Significant

Anchor: a-

Modifiers

- Diversification/portfolio effect: Neutral (no impact)
- Capital structure: Neutral (no impact)
- Financial policy: Neutral (no impact)
- Liquidity: Adequate (no impact)
- Management and governance: Neutral
- Comparable rating analysis: Positive (+1 notch)

Stand-alone credit profile: a

Group credit profile: bbb+

Group status: Insulated (+2 notches)

## Related Criteria

- Criteria | Corporates | General: Methodology: Management And Governance Credit Factors For Corporate Entities, Jan. 7, 2024
- Criteria | Corporates | General: Corporate Methodology, Jan. 7, 2024
- General Criteria: Hybrid Capital: Methodology And Assumptions, March 2, 2022
- General Criteria: Environmental, Social, And Governance Principles In Credit Ratings, Oct. 10, 2021
- General Criteria: Group Rating Methodology, July 1, 2019
- Criteria | Corporates | General: Corporate Methodology: Ratios And Adjustments, April 1, 2019
- Criteria | Corporates | General: Reflecting Subordination Risk In Corporate Issue Ratings, March 28, 2018
- General Criteria: Methodology For Linking Long-Term And Short-Term Ratings, April 7, 2017
- Criteria | Corporates | General: Methodology And Assumptions: Liquidity Descriptors For Global Corporate Issuers, Dec. 16, 2014

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- General Criteria: Country Risk Assessment Methodology And Assumptions, Nov. 19, 2013
- General Criteria: Methodology: Industry Risk, Nov. 19, 2013
- Criteria | Corporates | Utilities: Key Credit Factors For The Regulated Utilities Industry, Nov. 19, 2013
- General Criteria: Principles Of Credit Ratings, Feb. 16, 2011

## Ratings List

### Ratings Affirmed; Outlook Action

	To	From
<b>Baltimore Gas and Electric Co.</b>		
Issuer Credit Rating	A/Negative/A-1	A/Stable/A-1

### Ratings Affirmed

#### Baltimore Gas and Electric Co.

Senior Unsecured	A
Preference Stock	BBB+
Commercial Paper	A-1

Certain terms used in this report, particularly certain adjectives used to express our view on rating relevant factors, have specific meanings ascribed to them in our criteria, and should therefore be read in conjunction with such criteria. Please see Ratings Criteria at [www.spglobal.com/ratings](http://www.spglobal.com/ratings) for further information. Complete ratings information is available to RatingsDirect subscribers at [www.capitaliq.com](http://www.capitaliq.com). All ratings affected by this rating action can be found on S&P Global Ratings' public website at [www.spglobal.com/ratings](http://www.spglobal.com/ratings).

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## CREDIT OPINION

24 April 2025

### Update



Send Your Feedback

### RATINGS

#### Baltimore Gas and Electric Company

Domicile	Baltimore, Maryland, United States
Long Term Rating	A3
Type	LT Issuer Rating
Outlook	Stable

Please see the [ratings section](#) at the end of this report for more information. The ratings and outlook shown reflect information as of the publication date.

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## Baltimore Gas and Electric Company

### Update following rating affirmation

#### Summary

BGE's ratings reflect its medium-sized transmission and distribution (T&D) utility operations with a rate base of approximately \$10.5 billion.

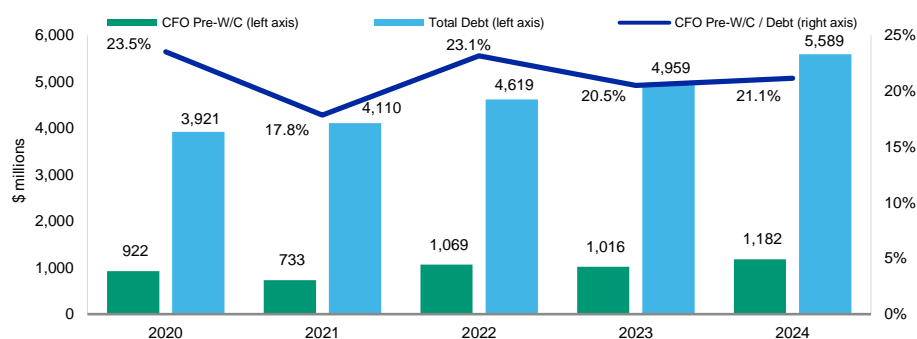
Maryland has a regulatory environment that is supportive of credit quality. In recent rate cases, the Maryland Public Service Commission (MDPSC) granted BGE return levels that align with industry standards, including a return on equity (ROE) of 9.50% for its electric distribution operations and 9.45% for its gas operations. It has implemented alternative rate mechanisms, such as MYPs, which are credit supportive as they provide cash flow certainty and minimize regulatory lag.

The MDPSC, however, is currently reevaluating the continuation of the MYP framework through its lessons learned proceedings, resulting in some uncertainty over the future of the regulatory framework. Although these proceedings were conducted in October 2024, the MDPSC has not yet reached a decision. In the meantime, on 7 April 2025, the Maryland legislature passed an energy bill outlining the criteria for the potential continuation of the MYP, indicating an interest in its usage going forward. The discontinuation of MYPs will likely have a negative, though incremental, impact on BGE's credit profile.

The company has historically maintained strong credit ratios, with a CFO pre-WC to debt ratio of 20% or higher in each of the past three years. However, we anticipate this ratio will decrease to 17%-18% from 2026 to 2028 before climbing back to 19% or above starting in 2029. This projected decline from 2026 to 2028 is attributed to approximately \$1.6 billion in debt that will be issued to fund capital expenditures for the construction of two significant FERC-regulated transmission projects: one in anticipation of power plant closures in the Baltimore area and one to support data center growth in northern Virginia.

Exhibit 1

#### Historical CFO Pre-WC, Total Debt and CFO Pre-WC to Debt



All data based on adjusted financial data, which follow our Financial Statement Adjustments in the Analysis of Nonfinancial Corporations methodology.

Source: Moody's Financial Metrics™

## Credit strengths

- » Low risk business model of electric T&D and gas LDC
- » Supportive regulatory provisions including an MYP and decoupling
- » Consistent financial performance

## Credit challenges

- » Large and growing capital program pressuring credit metrics
- » Potential for discontinuation of the MYP regulatory framework
- » Antiquated gas pipelines in a portion of its system

## Rating outlook

BGE's stable outlook is underpinned by its track record of exhibiting strong performance, a credit supportive regulatory environment, recent legislation potentially opening the door to another multiyear rate plan, and our expectation that the utility's CFO pre-WC to debt ratios will remain at or only marginally below the 18% downgrade threshold going forward.

## Factors that could lead to upgrade

A positive rating is unlikely, given our expectation that the company's CFO pre-WC to debt ratio may fall slightly below its downgrade guideline of 18% over the next three years.

Nevertheless, we would consider a positive action should the Maryland regulatory environment remain supportive, including an extension of the MYP framework and there is a rise of the utility's CFO pre-WC to debt to 21% or above. The 21% CFO pre-W/C to debt financial metric threshold for a possible upgrade has been reduced from the previously indicated threshold of 23% to better align BGE with peer companies.

## Factors that could lead to downgrade

BGE could be downgraded should its CFO pre-WC to debt ratio fall materially below the downgrade threshold of 18%. The 18% CFO pre-W/C to debt financial metric threshold for a possible downgrade has been lowered from our previously indicated threshold of 19% to better align BGE with peer companies.

A downgrade could also occur if there are regulatory setbacks or unexpected shocks, such as the potential discontinuation of the MYP or other cost recovery challenges, including issues related to storm cost reconciliation from BGE's first MYP filing.

## Key indicators

Exhibit 2

### Baltimore Gas and Electric Company

	2020	2021	2022	2023	2024
CFO Pre-W/C + Interest / Interest	7.8x	6.2x	8.0x	6.6x	6.4x
CFO Pre-W/C / Debt	23.5%	17.8%	23.1%	20.5%	21.1%
CFO Pre-W/C – Dividends / Debt	17.2%	10.7%	16.6%	14.1%	14.6%
Debt / Capitalization	40.7%	39.6%	40.6%	40.0%	41.2%

All data based on adjusted financial data, which follow our Financial Statement Adjustments in the Analysis of Nonfinancial Corporations methodology.

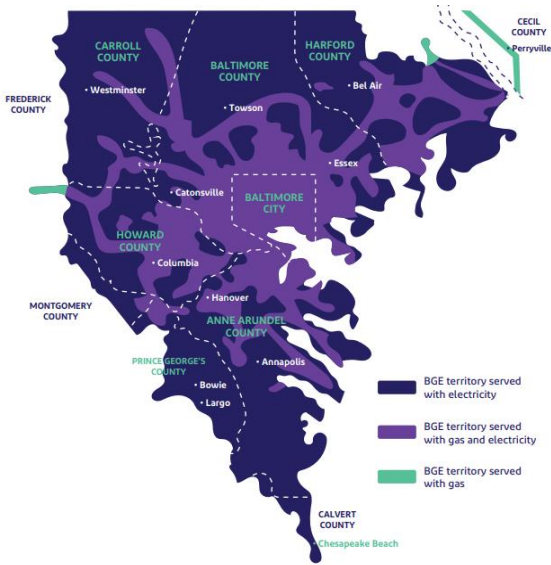
Source: Moody's Financial Metrics™

This publication does not announce a credit rating action. For any credit ratings referenced in this publication, please see the issuer/deal page on <https://ratings.moody.com> for the most updated credit rating action information and rating history.

Profile

BGE is a regulated electric and gas T&D utility, providing electric services to approximately 1.35 million customers and gas services to approximately 0.7 million customers, mostly around the greater Baltimore region.

Exhibit 3  
Service area



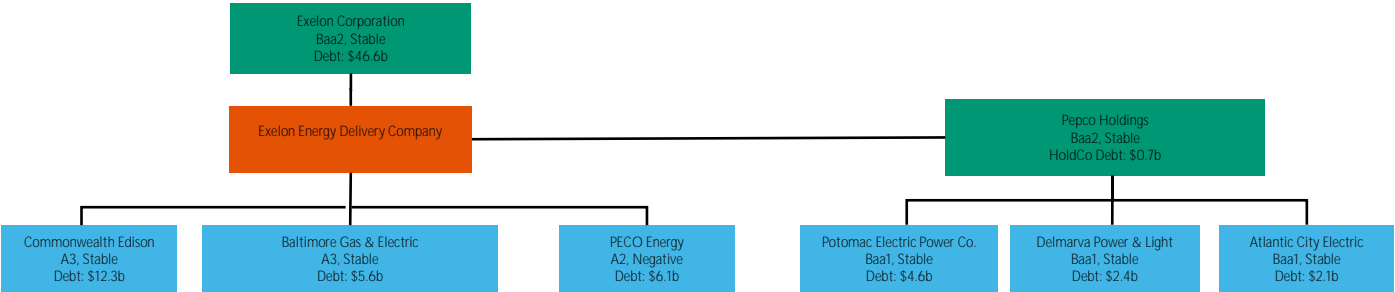
Source: Company filings

The MDPSC and the Federal Energy Regulatory Commission (FERC) regulate the utility, which derives approximately 78% of its revenue from its electric operations and 22% from its gas operations.

BGE estimates its rate base to be about \$10.5 billion. BGE's FERC-regulated transmission assets comprise about 18% of its rate base, while electric and gas delivery comprise 51% and 32%, respectively.

BGE is a wholly-owned subsidiary of Exelon Corporation (Exelon, Baa2 stable). It is the third largest regulated utility subsidiary within the Exelon family, making up about 17% of the total rate base.

Exhibit 4  
Organizational Structure  
Balance sheet debt as reported as of 31 December 2024



Pepco Holdings' debt excludes debt from its utilities  
Source: company filings

## Detailed credit considerations

### Low risk business model as electric T&D and gas LDC

BGE has low business risk because it engages in fully regulated electric T&D and gas delivery businesses and assumes no direct commodity exposure. We consider its transmission business, which accounts for 18% of the total rate base, to have lower business risk than its distribution business, partly because of FERC's formulaic rate mechanism and a favorable return on equity of 10.5%. BGE's transmission rate base will grow significantly over the next few years as it plans to invest \$1.9 billion in constructing two large transmission projects. Conversely, BGE's gas distribution business carries higher business risk because of the risks associated with a portion of its pipelines that are constructed from antiquated materials such as cast iron and bare steel.

### Credit supportive regulatory environment including an MYP and decoupling

Maryland has issued rate orders largely in line with the industry average. At the end of 2023, the MDPSC approved BGE's multiyear rate plan (MYP), establishing rate increases for 2024, 2025, and 2026. The commission approved 57% of BGE's requested increase for its electric business and 79% of the requested increase for its gas business. These increases were premised on an ROE of 9.50% and 52% equity capitalization for the electric distribution operations and 9.45% ROE and 52% equity capitalization for the gas distribution operations.

Exhibit 5

#### MDPSC's last rate order aligns with industry average

Jurisdiction	ROE %	Equity %	Requested (\$m)	Authorized (\$m)	% approved	Rate Effective
Maryland - Electric	9.50	52	313	179	57	1-Jan-24
Maryland - Gas	9.45	52	289	229	79	1-Jan-24

Source: Exelon 2024 10-k

Maryland's regulatory framework contains alternative rate mechanisms that are important for its credit quality, including a decoupling mechanism, procurement cost pass-through, and use of MYPs. The MYPs are particularly credit supportive because they establish multiple forward test years, greatly reducing regulatory lag and enhancing the stability and predictability of earnings and cash flow.

Maryland is currently reevaluating its use of the MYP framework through lessons learned proceedings. These proceedings were conducted in 2024 and, although the MDPSC has not yet issued a ruling on the continued use of the MYP framework, lawmakers have recently expressed interest by specifying the parameters for its potential continuation through legislation passed in April. The discontinuation of MYPs could negatively, albeit incrementally, affect BGE's financial profile, with any impact to be felt beginning in 2027.

In April 2024, BGE filed its request for recovery of the 2023 reconciliation amounts of \$152 million with the MDPSC, largely driven by storm costs, but the company is still awaiting a decision. If fully approved, the estimated bill impact at the time of filing would be approximately \$1.94 per month for electric customers and \$3.22 per month for gas customers, to be collected from March 2025 to December 2026. The reasons for the delay are unclear; however, if the decision results in a material disallowance, it could negatively affect our view of Maryland's regulatory environment.

### Antiquated portion of gas infrastructure system exposes BGE to event risk

Despite significant progress over the past five years, BGE still has a considerable number of aging and outmoded gas pipelines vulnerable to gas explosions, leaks and other accidents.

A large portion of the system is more than 50 years old. Approximately 12% of the company's gas distribution system – encompassing 870 miles of gas mains and over 56,000 service connections – consists of outmoded materials such as cast iron, bare steel and copper. Over the five-year period from 2019 through 2024, BGE retired 210 miles, or about 20%, of cast iron main and 3.4 miles, or about 22%, of bare steel main on the system. Over the same period, BGE also replaced approximately 15,000, or about 25%, of its bare steel service connections and approximately 4,000, or about 23%, of its copper service connections. Through the BGE Operation Pipeline program, the company is committed to replacing approximately 43 miles of cast iron and bare steel main per year along with associated bare steel and copper service connections. BGE's underground gas leak repairs have decreased every year since 2016,

with a 14% decrease between 2019 and 2024, primarily due to this proactive replacement strategy. BGE's leak management has also improved, resulting in more than a 34% decrease in open leaks at year-end across the same period.

Nevertheless, BGE experienced a gas explosion that destroyed an office building in 2019, although there were no fatalities because the explosion occurred on a weekend. The MDPSC, however, fined BGE \$437,000 for safety violations because electric and gas lines were installed in close proximity, known as joint trench installations. BGE is now implementing myriad enhancements to its system to prevent a similar incident from occurring again. We view explosions such as this incident as a significant risk factor for BGE's gas operation.

#### Consistent financial performance but large capital expenditure program will pressure metrics

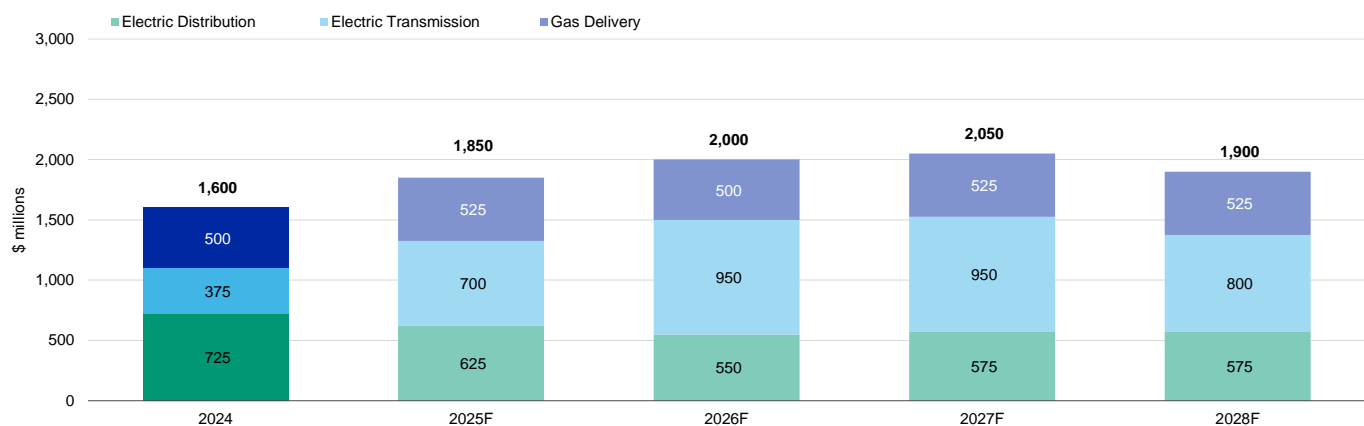
BGE has a significant capital spending program primarily due to electric and gas reliability investments as well as the upcoming capital program associated with the two large transmission projects. Capital expenditures for 2024 were about \$1.6 billion, and the company expects them to be about \$1.85 billion in 2025 but jump up to \$2 billion in 2026 and 2027 driven by the Brandon Shores and the Tri-county transmission projects. The ratio of capital expenditures to book depreciation, excluding the amortization of regulatory assets, is about 3x, among the highest in the utility industry, and rising even higher, to 4x in 2025 and 2026.

We view capital spending as essential for maintaining customer service and reliability. Still, it can exacerbate regulatory lag. The lag could be partially mitigated if BGE is granted construction work in progress (CWIP) in rate base treatment for its Tri-county project with the heaviest spendings years from 2027 to 2029.

Despite significant capital expenditures, BGE has maintained strong CFO pre-WC to debt ratios, averaging above 20% over the past three years, supported in part by cash flows from earnings and cost recovery related to regulatory assets created by energy efficiency spending. However, with the addition of the two transmission projects, this ratio is expected to decrease to around 17% to 18% between 2026 and 2028. The impact will be somewhat mitigated if BGE receives CWIP in rate base treatment for the Tri-county project. However, assuming Brandon Shores can recover its AFUDC on a timely basis, the effect of receiving CWIP in rate on CFO pre-WC to debt ratios will likely be less than 50 basis points. Additionally, Maryland's energy efficiency program is phasing out the use of regulatory assets to finance spending, which will reduce BGE's associated cash flow.

Exhibit 6

#### 2024 Capital Expenditures and Forecasted Capital Expenditure Plan



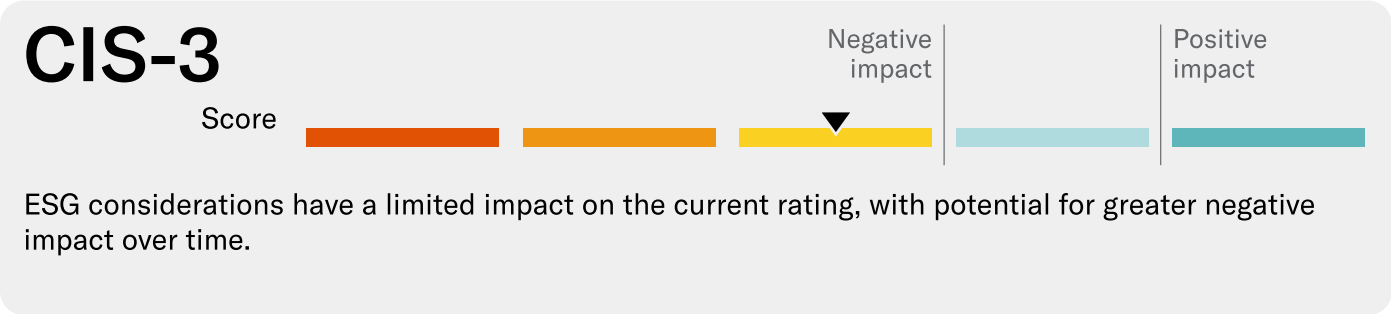
Numbers rounded to nearest \$25 million and may not sum due to rounding.

Source: Company filings

ESG considerations

Baltimore Gas and Electric Company's ESG credit impact score is CIS-3

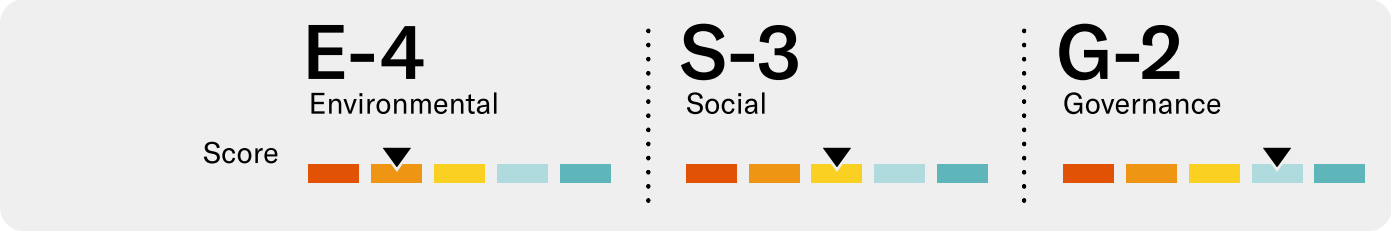
Exhibit 7  
ESG credit impact score



Source: Moody's Ratings

Baltimore Gas and Electric's **CIS-3** reflects high environmental risks due to exposure to storm damage, moderate social risk due to the nature of its customer-facing business, and neutral governance risk.

Exhibit 8  
ESG issuer profile scores



Source: Moody's Ratings

Environmental

BGE's **E-4** issuer profile score reflects its exposure to physical climate risk. All utilities with a presence on the Eastern Seaboard and Texas, including Baltimore Gas and Electric, are considered to have higher physical climate risk due to the potential for rising sea levels, hurricanes, and other severe weather conditions. This is partially offset by the company's neutral to low carbon transition risk as a transmission and distribution electric utility.

Social

BGE's **S-3** issuer profile score reflects the fundamental utility risk related to demographics and societal trends, including public concerns over affordability and the utility's reputational risk.

Governance

Baltimore Gas and Electric's governance risk is broadly in line with other utilities and does not pose a particular risk (**G-2** issuer profile). This is supported by neutral to low scores on exposures to financial strategy and risk management, management credibility and track record, organizational structure, compliance and reporting, and board structure policies and procedures.

ESG Issuer Profile Scores and Credit Impact Scores for the rated entity/transaction are available on Moodys.com. In order to view the latest scores, please click [here](#) to go to the landing page for the entity/transaction on MDC and view the ESG Scores section.

Liquidity analysis

BGE demonstrates adequate liquidity. The company's primary external source of liquidity is a \$600 million senior unsecured revolving credit facility, which expires in August 2029. As of December 31, 2024, BGE had no drawings against the credit facility. BGE uses the

revolving credit to back letters of credit and commercial paper issuances, though it only had \$25 million of letters of credit and \$175 million commercial paper outstanding at the end of December 2024.

The revolving credit facility does not contain a material adverse change clause for drawings. The sole financial covenant is a 2.0 times interest coverage ratio, with which the company is in compliance. BGE's next debt maturity is \$350 million of senior notes due on August 15, 2026.

For the year ended December 31, 2024, BGE produced cash from operations of about \$0.9 billion, funded capital investment of about \$1.4 billion, and paid dividends of about \$0.37 billion, resulting in negative free cash flow of approximately \$0.89 billion. BGE's cash balance on December 31, 2024 was \$33 million.

## Methodology and scorecard

We use our global Regulated Electric and Gas Utilities Industry methodology in analyzing Baltimore Gas and Electric Company,

Exhibit 9

### Methodology scorecard factors

#### Baltimore Gas and Electric Company

Regulated Electric and Gas Utilities Industry [1][2]			Current FY 12/31/2024		Moody's 12-18 Month Forward View As of 4/17/2025 [3]	
Factor 1 : Regulatory Framework (25%)	Measure	Score	Measure	Score	Measure	Score
a) Legislative and Judicial Underpinnings of the Regulatory Framework	A	A	A	A	A	A
b) Consistency and Predictability of Regulation	A	A	A	A	A	A
Factor 2 : Ability to Recover Costs and Earn Returns (25%)						
a) Timeliness of Recovery of Operating and Capital Costs	A	A	A	A	A	A
b) Sufficiency of Rates and Returns	A	A	A	A	A	A
Factor 3 : Diversification (10%)						
a) Market Position	Baa	Baa	Baa	Baa	Baa	Baa
b) Generation and Fuel Diversity	N/A	N/A	N/A	N/A	N/A	N/A
Factor 4 : Financial Strength (40%)						
a) CFO pre-WC + Interest / Interest (3 Year Avg)	6.9x	Aa	6x - 7x	Aa	6x - 7x	Aa
b) CFO pre-WC / Debt (3 Year Avg)	21.5%	A	17% - 20%	Baa	17% - 20%	Baa
c) CFO pre-WC – Dividends / Debt (3 Year Avg)	15.1%	A	11% - 14%	Baa	11% - 14%	Baa
d) Debt / Capitalization (3 Year Avg)	40.6%	A	38% - 42%	A	38% - 42%	A
Rating:						
Scorecard-Indicated Outcome Before Notching Adjustment		A2			A3	
HoldCo Structural Subordination Notching		0			0	
a) Scorecard-Indicated Outcome		A2			A3	
b) Actual Rating Assigned					A3	

All data based on adjusted financial data, which follow our Financial Statement Adjustments in the Analysis of Nonfinancial Corporations methodology.

Moody's forecasts are Moody's opinion and do not represent the views of the issuer.

Sources: Moody's Financial Metrics™ and Moody's Ratings forecasts

## Appendix

Exhibit 10

### Peer comparison

#### Baltimore Gas and Electric Company

(in \$ millions)	Baltimore Gas and Electric Company A3 Stable			Commonwealth Edison Company A3 Stable			Duquesne Light Company A3 Stable			PPL Electric Utilities Corporation A3 Stable			Connecticut Light and Power Company (The) A3 Negative		
	FY	FY	FY	FY	FY	FY	FY	FY	FY	FY	FY	FY	FY	FY	FY
	Dec-22	Dec-23	Dec-24	Dec-22	Dec-23	Dec-24	Dec-21	Dec-22	Dec-23	Dec-22	Dec-23	Dec-24	Dec-22	Dec-23	Dec-24
Revenue	3,895	4,027	4,426	5,761	7,844	8,219	1,017	1,154	1,203	3,030	3,008	2,876	4,818	4,579	4,615
CFO Pre-W/C	1,069	1,016	1,182	1,364	2,367	3,521	372	394	419	939	936	1,088	986	691	849
Total Debt	4,619	4,959	5,589	11,251	12,190	12,169	1,458	1,562	1,752	4,631	5,076	5,214	4,277	5,143	5,474
CFO Pre-W/C + Interest / Interest	8.0x	6.6x	6.4x	4.2x	5.6x	7.7x	7.1x	6.9x	6.3x	6.5x	5.2x	5.4x	6.7x	4.5x	4.6x
CFO Pre-W/C / Debt	23.1%	20.5%	21.1%	12.1%	19.4%	28.9%	25.5%	25.2%	23.9%	20.3%	18.4%	20.9%	23.1%	13.4%	15.5%
CFO Pre-W/C – Dividends / Debt	16.6%	14.1%	14.6%	7.0%	13.2%	22.5%	20.8%	18.1%	18.5%	9.3%	7.2%	12.5%	16.2%	7.0%	9.4%
Debt / Capitalization	40.6%	40.0%	41.2%	37.9%	38.2%	37.2%	39.2%	40.6%	42.3%	38.9%	40.4%	38.1%	36.4%	39.1%	38.7%

All data based on adjusted financial data, which follow our Financial Statement Adjustments in the Analysis of Nonfinancial Corporations methodology.

Source: Moody's Financial Metrics™

Exhibit 11

**Moody's-adjusted cash flow reconciliation**  
Baltimore Gas and Electric Company

(in \$ millions)	2020	2021	2022	2023	2024
<b>FFO</b>	<b>1,039.1</b>	<b>1,057.2</b>	<b>1,202.8</b>	<b>1,203.0</b>	<b>1,209.1</b>
+/- Other	(117.0)	(324.0)	(134.0)	(187.0)	(27.0)
<b>CFO Pre-WC</b>	<b>922.1</b>	<b>733.2</b>	<b>1,068.8</b>	<b>1,016.0</b>	<b>1,182.1</b>
+/- ΔWC	(1.0)	25.0	(181.0)	71.0	(153.0)
<b>CFO</b>	<b>921.1</b>	<b>758.2</b>	<b>887.8</b>	<b>1,087.0</b>	<b>1,029.1</b>
- Div	246.0	292.0	300.0	316.0	368.0
- Capex	1,277.6	1,255.2	1,389.8	1,503.0	1,554.1
<b>FCF</b>	<b>(602.5)</b>	<b>(789.0)</b>	<b>(802.0)</b>	<b>(732.0)</b>	<b>(893.0)</b>
(CFO Pre-W/C) / Debt	23.5%	17.8%	23.1%	20.5%	21.1%
(CFO Pre-W/C - Dividends) / Debt	17.2%	10.7%	16.6%	14.1%	14.6%
FFO / Debt	26.5%	25.7%	26.0%	24.3%	21.6%
RCF / Debt	20.2%	18.6%	19.5%	17.9%	15.0%
Revenue	3,098.0	3,341.0	3,895.0	4,027.0	4,426.0
Interest Expense	136.3	141.8	152.2	183.1	217.0
Net Income	348.8	405.6	417.9	485.0	527.0
Total Assets	11,650.0	12,324.0	13,350.0	14,331.0	15,542.0
Total Liabilities	7,453.0	7,754.0	8,414.0	8,841.0	9,656.0
Total Equity	4,197.0	4,570.0	4,936.0	5,490.0	5,886.0

All data based on adjusted financial data, which follow our Financial Statement Adjustments in the Analysis of Nonfinancial Corporations methodology.

Source: Moody's Financial Metrics™

## Ratings

Exhibit 12

Category	Moody's Rating
<b>BALTIMORE GAS AND ELECTRIC COMPANY</b>	
Outlook	Stable
Issuer Rating	A3
Sr Unsec Bank Credit Facility	A3
Senior Unsecured	A3
Commercial Paper	P-2
<b>PARENT: EXELON CORPORATION</b>	
Outlook	Stable
Issuer Rating	Baa2
Sr Unsec Bank Credit Facility	Baa2
Senior Unsecured	Baa2
Jr Subordinate	Baa3
Commercial Paper	P-2

Source: Moody's Ratings

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REPORT NUMBER 1440744

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BALTIMORE GAS AND ELECTRIC

\$6 MILLION INVESTMENT- 20-YEAR RECOVERY- COMPARISON OF AFUDC

AND CWIP IN RATE BASE MODELS

(\$'s in millions)

MODELING WITH AFUDC

A	Rate of Return									
		Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18
B	Capital Expenditures									
C = Prior E + B	Capital Expenditures- Accumulated									
D= C * A	AFUDC Accrued									
E= C + D	Capital Expenditures- Accumulated- with AFUDC									
F= Year 3's E	Gross Plant	7	7	7	7	7	7	7	7	7
G= F / 20	Depreciation	0	0	0	0	0	0	0	0	0
H= Accumulation of G (Negative)	Accumulated Depreciation	(2)	(3)	(3)	(3)	(4)	(4)	(4)	(5)	(5)
I= F + H	Net Book Value	4	4	4	3	3	3	2	2	2
J= I * A	Return on Net Book Value	0	0	0	0	0	0	0	0	0
K= G + J	Total Revenues Recovered from Customers	1	1	1	1	1	1	1	0	0
L= NPV of K using A	Net Present Value- Recovered from Customers									
M= SUM of K	Nominal Basis- Recovered from Customers									

MODELING WITH CWIP IN RATE BASE

N	Rate of Return									
		Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18
O	Capital Expenditures									
P= Accumulation of O	Capital Expenditures- Accumulated									
Q= N * P	Return on CWIP Recovered									
R= Year 3's P	Gross Plant	6	6	6	6	6	6	6	6	6
S= R / 20	Depreciation	0	0	0	0	0	0	0	0	0
T= Accumulation of S (Negative)	Accumulated Depreciation	(2)	(2)	(3)	(3)	(3)	(4)	(4)	(4)	(5)
U= R + T	Net Book Value	4	4	3	3	3	2	2	2	2
V= U * N	Return on Net Book Value	0	0	0	0	0	0	0	0	0
W= Q + S + V	Total Revenues Recovered from Customers	1	1	1	1	0	0	0	0	0
X= NPV of W using N	Net Present Value- Recovered from Customers									
Y= SUM of W	Nominal Basis- Recovered from Customers									

Z= X - L

Net Present Value Difference

AA= Y - M

Nominal Customer Savings- CWIP in Rate Base

BALTIMORE GAS AND ELECTRIC  
\$6 MILLION INVESTMENT- 20-YEAR RECOVERY- COMPARISON OF AFUDC  
AND CWIP IN RATE BASE MODELS  
(\$'s in millions)

MODELING WITH AFUDC

A	Rate of Return					
		Year 19	Year 20	Year 21	Year 22	Year 23
B	Capital Expenditures					
C = Prior E + B	Capital Expenditures- Accumulated					
D= C * A	AFUDC Accrued					
E= C + D	Capital Expenditures- Accumulated- with AFUDC					
F= Year 3's E	Gross Plant	7	7	7	7	7
G= F / 20	Depreciation	0	0	0	0	0
H= Accumulation of G (Negative)	Accumulated Depreciation	(6)	(6)	(6)	(7)	(7)
I= F + H	Net Book Value	1	1	1	0	-
J= I * A	Return on Net Book Value	0	0	0	0	-
K= G + J	Total Revenues Recovered from Customers	0	0	0	0	0
L= NPV of K using A	Net Present Value- Recovered from Customers					
M= SUM of K	Nominal Basis- Recovered from Customers					

MODELING WITH CWIP IN RATE BASE

N	Rate of Return					
		Year 19	Year 20	Year 21	Year 22	Year 23
O	Capital Expenditures					
P= Accumulation of O	Capital Expenditures- Accumulated					
Q= N * P	Return on CWIP Recovered					
R= Year 3's P	Gross Plant	6	6	6	6	6
S= R / 20	Depreciation	0	0	0	0	0
T= Accumulation of S (Negative)	Accumulated Depreciation	(5)	(5)	(5)	(6)	(6)
U= R + T	Net Book Value	1	1	1	0	-
V= U * N	Return on Net Book Value	0	0	0	0	-
W= Q + S + V	Total Revenues Recovered from Customers	0	0	0	0	0
X= NPV of W using N	Net Present Value- Recovered from Customers					
Y= SUM of W	Nominal Basis- Recovered from Customers					
Z= X - L	Net Present Value Difference					
AA= Y - M	Nominal Customer Savings- CWIP in Rate Base					

## ATTACHMENT B

**UNITED STATES OF AMERICA**  
**BEFORE THE**  
**FEDERAL ENERGY REGULATORY COMMISSION**

**PREPARED DIRECT TESTIMONY OF**  
**JASON M. B. MANUEL**  
**ON BEHALF OF BALTIMORE GAS AND ELECTRIC COMPANY**

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**LIST OF SPONSORED EXHIBITS**

Exhibit No. BGE-6

Listing of previously filed testimony and corresponding BGE cases

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

PREPARED DIRECT TESTIMONY OF  
JASON M. B. MANUEL  
ON BEHALF OF BALTIMORE GAS AND ELECTRIC COMPANY

1    **I.    INTRODUCTION**

2    **Q1.    Please state your name, position and responsibilities.**

3    A1.    My name is Jason M. B. Manuel. I am the Senior Manager of Revenue Policy for Baltimore  
4           Gas and Electric Company (“BGE”). My current responsibilities include BGE ratemaking  
5           activities at the Federal Energy Regulatory Commission (“FERC” or “the Commission”)  
6           and the Maryland Public Service Commission (“MD PSC”), and coordination of various  
7           regulatory filings and compliance matters.

8    **Q2.    Please summarize your business experience and educational background.**

9    A2.    I have been employed by BGE for over twenty years, serving in various capacities in  
10          Finance and Accounting, Regulatory, and Customer Operations prior to assuming my  
11          current position. Before coming to BGE, I was employed as a financial statements and  
12          internal controls auditor at Ernst & Young LLP, and as a project engineer for AMETEK,  
13          Inc., a manufacturing conglomerate. I hold a Bachelor of Science Degree in Mechanical  
14          Engineering from Lehigh University and a Master’s Degree in Business Administration  
15          with a Concentration in Accounting from the University of Maryland – College Park. I am  
16          a Certified Public Accountant and a member of the American Institute of Certified Public  
17          Accountants.

**Q3. Have you ever been admitted as an expert witness on public utility ratemaking and accounting matters in any other proceeding?**

A3. Yes, I have submitted expert testimony in the following FERC proceedings: Docket Nos. ER15-915, ER15-2331, ER18-404, and ER21-2023. I have testified before the MD PSC in Case Nos. 9096, 9208, 9230, 9484, 9610, 9645, and 9692 and before the Maryland State Tax Court in *State Department of Assessments and Taxation v. Baltimore Gas & Electric Company*.

**Q4. What is the purpose of your Testimony?**

A4. My testimony is offered on behalf of BGE in support of its request for approval to modify Attachment H-2A of the PJM Open Access Transmission Tariff (“PJM Tariff”) to provide for recovery of 100 percent of Construction Work in Progress (“CWIP”) costs in rate base (“CWIP Incentive”) that are related to the construction of a new FERC-jurisdictional and PJM Board of Managers (“PJM Board”)-approved major baseline wholesale electric transmission project from 2022 Regional Transmission Expansion Plan Window 3 (“Window 3 Project”). My testimony consists of three primary areas of focus. First, I will describe the necessary revisions to BGE’s Attachment H-2A of the PJM Tariff. Second, I will explain the accounting procedures and internal controls governing Window 3 Project costs that will ensure there is no double recovery of CWIP costs in rates. Third, I will discuss the proposed implementation of the requested tariff changes in BGE’s 2026 Annual Update and the estimated revenue requirement impact to be included in Network Integration Transmission Service (“NITS”) rates effective June 1, 2026.

**Q5. Do you sponsor any exhibits?**

A5. Yes. In addition to my Testimony, I am sponsoring Exhibit No. BGE-6, which includes a listing of previous BGE cases in which I have filed testimony.

**II. BACKGROUND – BGE’S REQUEST FOR CWIP INCENTIVE**

**Q6. Please briefly describe BGE’s formula rate transmission cost recovery mechanism.**

A6. BGE utilizes a formula rate initially approved by the Commission in Docket No. ER05-515 to compute its annual NITS revenue requirements.<sup>1</sup> Every year under my supervision, my team calculates BGE’s Annual Transmission Revenue Requirements (“ATRR”) and coordinates with PJM to post the Annual Update publicly and submit with FERC on or before May 15 of each year, to be effective from June 1 of a given calendar year through May 31 of the subsequent calendar year (the “Rate Year”).<sup>2</sup> The ATRR consists of two templates, one that calculates a projected annual transmission revenue requirement (“PTRR”) for the upcoming year and one that calculates a true-up transmission revenue requirement (“True-Up TRR”) for the prior year.<sup>3</sup>

**Q7. What is BGE requesting in this section 205 filing?**

A7. BGE is requesting FERC to approve its application for incentive treatment that will provide for recovery of 100 percent of CWIP in rate base for the Window 3 Project. BGE is requesting the necessary tariff modifications to effectuate this cost recovery treatment be made effective October 1, 2025. Upon posting its 2026 Annual Update with PJM and

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<sup>1</sup> FERC has since approved several tariff modifications to BGE’s formula rate. Notably, in Docket No. ER21-214, FERC approved BGE’s use of projected values for plant using the average of 13 monthly balances, including CWIP in rate base but “only CWIP authorized by the Commission for inclusion in rate base.” See PJM Tariff, Attachment H-2A, Part II, Attachment 9 (Rate Base Worksheet), at n.B.

<sup>2</sup> See PJM Tariff, Attachment H-2B (“Protocols”), Section 2.a.

<sup>3</sup> See Protocols, Section 2.b.

submitting with FERC by May 15, 2026, BGE will commence recovery of the Window 3 Project CWIP Incentive effective June 1, 2026.

**Q8. Please briefly describe the Window 3 Project.**

A8. As explained in BGE's transmittal letter to its application, the Window 3 Project is a new FERC-jurisdictional and PJM Board-approved major baseline wholesale electric transmission project. The Window 3 Project will be built within BGE's service territory in central Maryland. The Window 3 Project is needed to maintain transmission system reliability following the identification of reliability violations stemming largely from data center load growth forecasted in northern Virginia.

**Q9. Please briefly describe BGE's related financial credit metric concerns.**

A9. As discussed more fully in the Direct Testimony of Witness Michael J. Cloyd, the Window 3 Project represents a significant transmission project for BGE that will require a lengthy construction period and a significant outlay of cash estimated at \$634 million.<sup>4</sup> For reasons further elaborated in Witness Cloyd's testimony, the Window 3 Project is expected to result in a deterioration of BGE's financial credit metrics and has already resulted in at least one of the major credit rating agencies issuing a negative (*i.e.*, unfavorable) outlook. FERC approval of BGE's application for CWIP Incentive treatment will help to mitigate the risk of an actual credit downgrade from any or all of the major credit rating agencies.

**III. BACKGROUND – FERC REQUIREMENTS FOR CWIP INCENTIVE**

**Q10. Does FERC have any requirements for utilities seeking CWIP Incentive treatment?**

A10. Yes. My testimony addresses two requirements for utilities seeking the CWIP Incentive. The first requirement to be discussed relates to tariff modifications and the second

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<sup>4</sup> See Transmittal Letter, Attachment C.

1 requirement to be described relates to accounting procedures. I briefly address the FERC  
2 orders and regulations governing these requirements below. Also, please refer to the  
3 testimony of Witness Cloyd for a complete discussion of how BGE meets FERC's nexus  
4 requirement.

5 **Q11. What are the FERC orders and regulations that dictate the CWIP Incentive**  
6 **requirements?**

7 A11. FERC Order No. 679, issued in July 2006, and FERC Order No. 679-A, issued in  
8 December 2006, detail the requirements for utilities seeking CWIP Incentive treatment.  
9 Together, these orders amended and clarified FERC's regulations to establish incentive-  
10 based (including performance-based) rate treatments for the transmission of electric energy  
11 in interstate commerce by public utilities for the purpose of benefiting consumers by  
12 ensuring reliability and reducing the cost of delivered power by reducing transmission  
13 congestion.<sup>5</sup> In addition, the Commission's regulations stipulate other requirements.  
14 Within these orders and regulations, FERC provides specific requirements for utilities  
15 seeking the CWIP Incentive.

16 **Q12. Can you please provide and elaborate on the FERC requirement related to tariff**  
17 **modifications?**

18 A12. Yes. In Order No. 679, FERC states that, "(e)ven for rates that are formulaic, it may be  
19 necessary for the utility to revise the rate formula under section 205 to capture the recovery  
20 of these types of costs to the extent that they are not provided for in the formula."<sup>6</sup> As

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<sup>5</sup> See *Promoting Transmission Investment through Pricing Reform*, Order No. 679, FERC Stats. & Regs. ¶ 31,222 (2006) ("Order No. 679"), Order No. 679-A, FERC Stats. & Regs. ¶ 31,236 (2006) ("Order 679-A"), *order on reh'g*, 119 FERC ¶ 61,062 (2007).

<sup>6</sup> See Order No. 679, at P 117.

1 explained in my testimony above, BGE does indeed utilize a formula rate to update its  
2 annual NITS rate. Since the formula rate does not provide for recovery of Window 3  
3 Project CWIP (or any CWIP for that matter) in rate base, tariff changes are necessary to  
4 effectuate appropriate cost recovery. I will explain BGE's requested tariff changes in detail  
5 later in my testimony.

6 **Q13. Please address the second set of requirements directed by FERC related to accounting**  
7 **procedures.**

8 A13. FERC requires applicants for CWIP in rate base treatment to propose accounting  
9 procedures that ensure there is no double recovery of CWIP in rate base and capitalization  
10 of AFUDC. FERC regulations state that, "(o)n the date that any proposed rate that includes  
11 CWIP in rate base becomes effective, a public utility that has included CWIP in rate base  
12 must discontinue the capitalization of any AFUDC related to those amounts of CWIP i[n]  
13 rate base."<sup>7</sup> The Commission's regulations continue by directing utilities to propose  
14 accounting procedures that "(e)nsure that wholesale customers will not be charged for both  
15 capitalized AFUDC and corresponding amounts of CWIP proposed to be included in rate  
16 base."<sup>8</sup> Furthermore, Order No. 679-A provides that "the Commission's review process  
17 under section 205 will include a review to determine that the applicant does not double  
18 recover these costs."<sup>9</sup> In a subsequent section of my testimony, I fully explain BGE's  
19 proposed accounting procedures and internal controls that address the "no double  
20 recovery" requirement.

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<sup>7</sup> 18 C.F.R. § 35.25(e) (2024).

<sup>8</sup> 18 C.F.R. § 35.25(f).

<sup>9</sup> Order No. 679-A, at P 114.

IV. **TARIFF CHANGES REQUESTED**

**Q14. What specific tariff changes are being proposed?**

A14. BGE is proposing several tariff revisions to its formula rate, as shown in Attachments E and G to the transmittal letter. The first tariff change includes the addition of a new row, Line 44b, to be included in the “Adjustment to Rate Base” section of Attachment H-2A. As shown in the screen shot below of BGE’s proposed redlined tariff, this row will be titled “Transmission CWIP in Rate Base”, will reference a new footnote, and will be linked to “Attachment 9 – Rate Base” of the formula rate template found at PJM Tariff, Attachment H-2A, Part II.

**Figure 1. “Attachment H-2A” tab of BGE’s Formula Rate Template**

	<b>Transmission CWIP in Rate Base</b>			
44b	Transmission CWIP in Rate Base	(Note AB)	Attachment 9, line 30, column b	0

The aforementioned new footnote, Note AB, will inform and limit the use of the new “Transmission CWIP in Rate Base” row to CWIP associated with the Window 3 Project effective October 1, 2025, and as approved by FERC in this docket. To effectuate the inclusion of Line 44b in BGE’s formula rate revenue requirement calculations, Line 58 “TOTAL Adjustment to Rate Base” must be revised to include a reference to Line 44b in the existing summing computation of Line 58.

As noted previously,<sup>10</sup> Attachment 9 – Rate Base of BGE’s formula rate is currently set up to calculate a 13-month average of CWIP in Rate Base, but it is limited to CWIP authorized by the Commission for inclusion in rate base. To date, BGE has not utilized this section of its formula rate as BGE has not sought, and the Commission has not

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<sup>10</sup> See *supra* n.1.

authorized, inclusion of CWIP in rate base for any specific BGE transmission projects. With this filing, BGE proposes to link the 13-month average of CWIP in Rate Base, as calculated in Line 30, column (b) of Attachment 9 – Rate Base, to Line 44b of the Attachment H-2A tab and include a reference to Line 44b in the column (b) header. Please see a screen shot below of BGE’s existing tariff, redlined with the new proposed reference to the Attachment H-2A tab.

**Figure 2. “Attachment 9 – Rate Base” tab of BGE’s Formula Rate Template**

Line No	Month (a)	CWIP CWIP in Rate Base (b)
	Attachment H-2A, Line No:	<u>44b</u>
		(Note B)
17	December Prior Year Actual	-
18	January	-
19	February	-
20	March	-
21	April	-
22	May	-
23	June	-
24	July	-
25	August	-
26	September	-
27	October	-
28	November	-
29	December	-
30	Average of the 13 Monthly Balances (Note D)	-

**V. ACCOUNTING PROCEDURES PROPOSED**

**Q15. What accounting procedures does BGE propose to meet FERC’s requirements related to CWIP Incentive treatment?**

**A15.** As noted earlier in my testimony, FERC requires applicants for CWIP Incentive treatment to propose accounting procedures that ensure there is no double recovery of CWIP in rate

1 base and capitalization of AFUDC. To meet this set of requirements, BGE proposes the  
2 following accounting procedures and internal controls.

3 First, BGE will continue to track the phases of the Window 3 Project under unique  
4 project numbers in its Oracle-based “Projects Accounting” general ledger accounting  
5 software system.<sup>11</sup> BGE has existing accounting procedures and internal controls that  
6 govern the proper setup of individual projects, including separate accounting project  
7 reviews and monitoring activities. Second, and consistent with its existing accounting  
8 procedures, BGE specifies directly in the general ledger accounting system whether or not  
9 AFUDC gets accrued for each unique project number. This is accomplished in the general  
10 ledger by literally “check-marking” a distinct field in the accounting system that indicates  
11 whether a project number will receive AFUDC or not. Third, and consistent with  
12 Commission regulations,<sup>12</sup> BGE’s finance and accounting personnel will review and  
13 ensure that the AFUDC accounting field indicates that AFUDC for the Window 3 Project  
14 will be accrued up to September 30, 2025, and will be discontinued effective October 1,  
15 2025.

16 **Q16. Please continue with your discussion of BGE’s proposed accounting procedures.**

17 A16. The fourth accounting procedure BGE proposes to implement relates to the inputs to its  
18 formula rate. Specifically, BGE will populate the “CWIP in Rate Base” section of the  
19 “Attachment 9 – Rate Base” tab only with the cumulative month-end balances of the unique  
20 Window 3 Project numbers that are included in the general ledger accounting system in  
21 FERC Account 107, “Construction Work in Progress – Electric”, effective October 2025.

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<sup>11</sup> Oracle is a U.S.-based information technology company that offers a wide range of business-oriented products and services, including accounting software. See [www.oracle.com](http://www.oracle.com).

<sup>12</sup> See *supra* n.9.

At the time each Window 3 Project phase gets placed in service in a future year, those project costs will be appropriately transferred from FERC Account 107, “Construction Work in Progress”, to FERC Account 101, “Electric Plant in Service”, in accordance with the FERC Uniform System of Accounts, and appropriately included in BGE’s formula rate as Plant in Service.<sup>13</sup> This will prevent Window 3 Project costs from being included in both Plant in Service and CWIP in Rate Base.

**Q17. How do these proposed accounting procedures and internal controls compare to FERC precedent?**

A17. The accounting procedures and internal controls identified above conform to FERC precedent. The Commission has accepted similar accounting procedures and internal controls that track a unique project’s capital expenditures, ensure that AFUDC is discontinued for any project receiving recovery of 100 percent of CWIP costs in rate base, and prevent double recovery of project costs.<sup>14</sup>

**VI. REVENUE REQUIREMENT IMPACT**

**Q18. Please further describe BGE’s proposed timing and approach for commencing recovery of the CWIP Incentive for the Window 3 Project.**

A18. With this filing, BGE is requesting FERC approve its proposed tariff modifications necessary to commence recovery of CWIP in rate base for the Window 3 Project, with a tariff effective date of October 1, 2025. This timing will provide for BGE to commence

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<sup>13</sup> In accordance with the FERC Uniform System of Accounts, Account 106 “Completed Construction not Classified”, some project costs will first be transferred from FERC Account 107 to FERC Account 106 before ultimately being transferred to FERC Account 101. The definition of FERC Account 106 provides that “[t]his account shall include the total of the balances of work orders for electric plant which has been completed and placed in service but which work orders have not been classified for transfer to the detailed electric plant accounts.”

<sup>14</sup> See e.g., *NextEra Energy Transmission MidAtlantic Indiana, Inc. et al.*, 186 FERC ¶ 61,052 (2024); *Transource Missouri, LLC*, 141 FERC ¶ 61,075 (2012); *Central Maine Power Co.*, 128 FERC ¶ 61,143 (2009).

**Baltimore Gas and Electric Company**  
**Exhibit No. BGE-5**

recovery in its upcoming 2026 Annual Update, which must be publicly posted by PJM and submitted with FERC by May 15, 2026, for the NITS rate to be effective June 1, 2026 as previously discussed herein.

In its 2026 Annual Update, BGE will populate its True-Up TRR for calendar year 2025 with actual cumulative month-end CWIP balances for the Window 3 Project for October 2025 through December 2025 and reflect zero month-end balances for December 2024 through September 2025. The screen shot below provides an illustrative example of the 13-month average CWIP in rate base calculation to be utilized in BGE's 2026 Annual Update True-Up TRR.

Line No	Month (a)	CWIP CWIP in Rate Base (b)
	Attachment H-2A, Line No:	44b
		(Note B)
17	December Prior Year Actual	-
18	January	-
19	February	-
20	March	-
21	April	-
22	May	-
23	June	-
24	July	-
25	August	-
26	September	-
27	October	10,000,000
28	November	11,000,000
29	December	12,000,000
30	Average of the 13 Monthly Balances (Note D)	2,538,462

In addition, BGE will populate its PTRR template with forecasted cumulative month-end CWIP balances for the Window 3 Project for the months of January 2026 through December 2026.

1 **Q19. What is your estimated revenue requirement impact of the Window 3 Project to be**  
2 **included in BGE's 2026 Annual Update?**

3 A19. Based on BGE's estimates of CWIP in rate base for the Window 3 Project, I estimate the  
4 resulting revenue requirement impact to be \$3.2 million in BGE's 2026 Annual Update.<sup>15</sup>

5 **VII. SUMMARY AND CONCLUSION**

6 **Q20. Please summarize your testimony.**

7 A20. My testimony addresses FERC's requirements related to tariff changes and accounting  
8 procedures that must be met by utilities seeking the CWIP Incentive. In addition, I explain  
9 BGE's proposed tariff revisions, describe BGE's proposed accounting procedures and  
10 internal controls, and provide the anticipated timing and estimated revenue requirement  
11 impact of the CWIP Incentive on BGE's wholesale customer rates.

12 **Q21. Does this conclude your testimony?**

13 A21. Yes, it does.

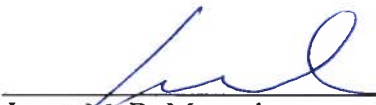
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<sup>15</sup> The total estimate of \$3.2 million breaks down into the following components: True-Up TRR estimate of approximately \$0.2 million plus PTRR estimate of approximately \$3 million.

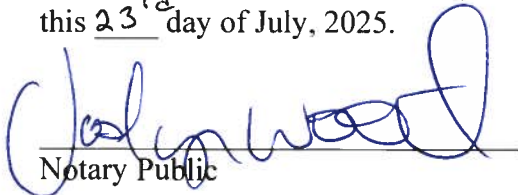
## VERIFICATION

Pursuant to 28 U.S.C. § 1746 (2012), I state under penalty of perjury that the foregoing testimony is true and correct to the best of my knowledge, information, and belief.

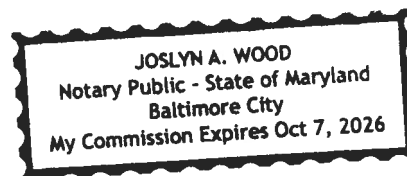
Executed this 23<sup>rd</sup> day of July, 2025.

  
\_\_\_\_\_  
Jason M. B. Manuel  
Senior Manager - Revenue Policy  
Baltimore Gas and Electric Company

Subscribed and sworn before me, the undersigned notary public,  
this 23<sup>rd</sup> day of July, 2025.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: October 7, 2026



**Baltimore Gas and Electric Company**  
**Expert Testimony**  
**Provided by Jason M. B. Manuel**

**Exhibit No. BGE-6**

<u>Year</u>	<u>Jurisdiction</u>	<u>Case/Docket No.</u>	<u>Service</u>	<u>Subject</u>
2006	MD PSC	9096	Gas and Electric Distribution	Depreciation
2009	MD PSC	9208	Gas and Electric Distribution	Tariffs
2010	MD PSC	9230	Gas and Electric Distribution	Rate Design
2015	FERC	ER15-950	Electric Transmission	Depreciation
2015	FERC	ER15-2331	Electric Transmission	Tariffs
2017	FERC	ER18-404	Electric Transmission	Tariffs
2018	MD PSC	9484	Gas Distribution	Rate Design
2019	MD PSC	9610	Gas and Electric Distribution	Cost of Service
2020	MD PSC	9645	Gas and Electric Distribution	Cost of Service
2021	FERC	ER21-2023	Electric Transmission	Tariffs
2023	MD PSC	9692	Gas and Electric Distribution	Cost of Service

## ATTACHMENT C



2750 Monroe Boulevard  
Audubon, PA 19403

December 29, 2023

Dear Designated Entity:

This letter is notification that Baltimore Gas & Electric Company (BGE) is the Designated Entity with construction responsibility for PJM baseline upgrades that were approved by the PJM board on December 11, 2023.

At their meeting on December 11, 2023, the PJM Board of Managers (PJM Board) approved portions of the Regional Transmission Expansion Plan (RTEP) pursuant to Schedule 6 of the PJM Operating Agreement. Schedule 6 – Regional Transmission Expansion Planning Protocol – governs the process for planning the expansion and enhancement of transmission facilities to meet reliability criteria and to enhance market efficiency and to address ARR insufficiency.

Attachment A to this letter identifies BGE as the Designated Entity for each upgrade as provided for in the RTEP<sup>1</sup> as presently approved by the PJM Board. A complete summary of the total RTEP for reliability and market efficiency can be obtained from the PJM web page at the following link: <https://www.pjm.com/planning/project-construction.aspx>

Attachment B lists the projects that have experienced a change in scope.

Attachment C lists the projects that are no longer included in the PJM RTEP as baseline upgrades and are cancelled. The Transmission Owner may still wish to construct some or all of these projects. In that case, the corresponding scope of work should be coordinated with PJM and assigned a supplemental project upgrade identifier.

In accordance with the PJM Operating Agreement, Schedule 6, Section 1.5.8, within 30 days of receiving this notification of its designation, the Designated Entity shall notify the Office of the Interconnection of its acceptance of such designation and submit to the Office of the Interconnection a development schedule, which shall include, but not be limited to, milestones necessary to develop and construct the projects to achieve the required in-service dates, including milestone dates for obtaining all necessary authorizations and approvals, including but not limited to, state approvals. Your response should be sent to PJM attention at the following email address: [PJM.CRL@pjm.com](mailto:PJM.CRL@pjm.com). You will then be contacted by staff from PJM's Transmission Coordination & Analysis Department to develop and implement the applicable agreements.

Outage coordination of planned upgrades is a critical part of the near term planning process. PJM requests that the identified Transmission Owners and/or the Designated Entity determine preliminary outage schedules associated with the attached construction work and communicate those schedules to PJM by way of the eDART system as soon as possible. In addition the Transmission Owners are reminded to submit, via eDART, updated technical parameters for the upgrades (ratings, impedance, etc.) per PJM Manual requirements prior to placing the upgrades in service.

To timely meet the needed in-service date of the projects, all necessary state approvals should be obtained at least nine months prior to the required in-service dates specified in Attachment A to this document.

If there are any inaccuracies in the data below, such as the cost estimates or in service dates, or there is a disagreement about the construction designee, please contact Augustine Caven, Manager PJM Transmission Coordination & Analysis at [Augustine.Caven@pjm.com](mailto:Augustine.Caven@pjm.com).

Finally, PJM asks for your assistance in identifying any projects that may require corresponding coordination and/or system enhancements with a neighboring Transmission Owner or other entity. This is to include a review of local remedial action schemes (RASs), including those owned by neighboring Transmission Owner or other entities. Any potential impact and resulting change to an RAS should be coordinated with the RAS owner and PJM. Occasionally, the need for this coordination may be identified after the initial planning identification of the need for the RTEP upgrade.

Thank you for your timely response to this letter. Our Transmission Coordination & Analysis Staff will be contacting you to coordinate the development of the Designated Entity agreement.

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<sup>1</sup> This letter is not intended to raise any issues regarding the current or future cost allocation for the subject facilities. Any such issues should be addressed as part of the proceedings related to those issues.



2750 Monroe Boulevard  
Audubon, PA 19403

Sincerely,

A handwritten signature in black ink that reads "Paul McGlynn". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Paul McGlynn  
VP, Planning

cc: Kenneth Seiler; Sami Abdulsalam; Augustine Caven; Asanga Perera; Dave Egan; Susan McGill



**Attachment A: New required RTEP projects:**

In 2023 it was determined that the baseline reliability projects listed below are required to be constructed. These baseline reliability projects are required to be constructed by the PJM required in-service date.

New required RTEP projects:

PJM Baseline Upgrade ID	Project Description	Cost Estimate (\$M)	Construction Designation	Required In- Service Date	Related To Tie Line	Transmission Owner Projected In- Service Date
b3800.26	Build High Ridge 500 kV substation - Three bay breaker and half configuration.	\$0.00	BGE	6/1/2027	No	
b3800.27	High Ridge 500 kV substation (cut into Brighton-Waugh Chapel 500 kV line) - Waugh Chapel side.	\$33.67	BGE	6/1/2027	Yes	
b3800.28	High Ridge 500 kV substation (cut into Brighton-Waugh Chapel 500 kV line) - Brighton side.	\$33.67	BGE	6/1/2027	Yes	
b3800.29	High Ridge termination for the North Delta-High Ridge 500 kV line.	\$33.67	BGE	6/1/2027	No	
b3800.30	High Ridge - Install two 500/230 kV transformers.	\$22.11	BGE	6/1/2027	No	
b3800.32	Build new North Delta-High Ridge 500 kV line. (~59 miles).	\$407.11	BGE	6/1/2027	Yes	
b3800.34	Rebuild 5012 (existing Peach Bottom-Conastone) (new Gracetone-Conastone) 500 kV line on single circuit structures within existing ROW and cut into North Delta 500 kV and Gracetone 500 kV stations.	\$70.00	BGE	6/1/2027	Yes	
b3800.36	Rebuild 5012 (existing Peach Bottom-Conastone) (new North Delta-Gracetone BGE) 500 kV line on single circuit structures within existing ROW and cut into North Delta 500 kV and Gracetone 500 kV stations.	\$10.44	BGE	6/1/2027	Yes	
b3800.37	Replace terminal equipment limitations at Conastone 500 kV - on the (existing Peach Bottom-Conastone) or (new Gracetone-Conastone) 500 kV line.	\$4.93	BGE	6/1/2027	No	
b3800.4	New Otter Creek to Doubs 500 kV line (MD Border-PSEG Demarcation Point). Rebuild and expand existing ~1.6 miles of Otter Creek-Conastone 230 kV line to become a double-circuit 500 and 230 kV lines.	\$11.11	BGE	6/1/2027	Yes	
b3800.41	Conastone-Brighton 500 kV (5011 circuit) - Replace terminal equipment limitations at Conastone 500 kV.	\$7.16	BGE	6/1/2027	Yes	



2750 Monroe Boulevard  
Audubon, PA 19403

**Attachment B: RTEP projects with Change in Scope:**

In 2023 it was determined that the baseline reliability projects listed below required a change in scope. These baseline reliability projects are required to be constructed by the PJM required in-service date.

RTEP projects with Change in Scope: None



2750 Monroe Boulevard  
Audubon, PA 19403

**Attachment C: Cancelled RTEP projects:**

In 2023 it was determined that the projects listed below are no longer included in the PJM RTEP as baseline upgrades. The Transmission Owner may still wish to construct some or all of these projects. In that case, the corresponding scope of work should be coordinated with PJM and assigned a supplemental project upgrade identifier.

Cancelled RTEP projects: None

## ATTACHMENT D

ATTACHMENT H-2A

Baltimore Gas and Electric Company			
Formula Rate	Notes	FERC Form 1 Page # or Instruction	
Shaded cells are input cells			
Allocators			
Wages & Salary Allocation Factor			
1	Direct Transmission Wages Expense	p354-355.21.b	0
1a	Exelon Business Services Company Transmission Wages Expense	p354 - p355 footnotes	0
1b	Total Transmission Wages Expense	(Line 1 + 1a)	0
2	Total Direct Wages Expense	p354-355.28.b	0
2a	Total Exelon Business Services Company Wages Expense	p354 - p355 footnotes	0
2b	Total Wages Expense	(Line 2 + 2a)	0
3	Less Direct A&G Wages Expense	p354-355.27.b	0
3a	Less Exelon Business Services Company A&G Wages Expense	p354 - p355 footnotes	0
4	Total	(Line 2b - 3 - 3a)	0
5	Wages & Salary Allocator	(Line 1b / 4)	#DIV/0!
Plant Allocation Factors			
6	Electric Plant In Service	p204-207.104.g (See Attachment 9A, line 14, column n)	0
7	Common Plant In Service - Electric	(Note A) (Line 24)	0
8	Total Plant In Service	(Sum Lines 6 & 7)	0
9	Accumulated Depreciation (Total Electric Plant)	p219.29.c (See Attachment 9A, line 42, column b)	0
10	Accumulated Intangible Amortization	(Note A) p200-201.21.c (See Attachment 9, line 16, column h)	0
11	Accumulated Common Amortization - Electric	(Note A) p356 (See Attachment 9, line 16, column i)	0
12	Accumulated Common Plant Depreciation - Electric	(Note A) p356 (See Attachment 9, line 16, column g)	0
13	Total Accumulated Depreciation	(Sum Lines 9 to 12)	0
14	Net Plant	(Line 8 - 13)	0
15	Transmission Gross Plant	(Line 29 - Line 28)	#DIV/0!
16	Gross Plant Allocator	(Line 15 / 8)	#DIV/0!
17	Transmission Net Plant	(Line 39 - Line 28)	#DIV/0!
18	Net Plant Allocator	(Line 17 / 14)	#DIV/0!
Plant Calculations			
Plant In Service			
19	Transmission Plant In Service	p204-207.58.g (See Attachment 9, line 16, column b and Attachment 9a, line 14, column f)	0
20	This Line Intentionally Left Blank	This Line Intentionally Left Blank	0
21	This Line Intentionally Left Blank	This Line Intentionally Left Blank	0
22	Total Transmission Plant In Service	(Line 19)	0
23	General & Intangible	P204-207.5.g & p204-207.99.g (See Attachment 9, line 16, column c less Attachment 9a, line 14, columns q and r)	0
24	Common Plant (Electric Only)	(Notes A) p356 (See Attachment 9, line 16, column d)	0
25	Total General & Common	(Line 23 + 24)	0
26	Wage & Salary Allocation Factor	(Line 5)	#DIV/0!
27	General & Common Plant Allocated to Transmission	(Line 25 * 26)	#DIV/0!
28	Plant Held for Future Use (Including Land)	(Note C) p214 (Attachment 9, line 30, column c)	0
29	TOTAL Plant In Service	(Line 22 + 27 + 28)	#DIV/0!
Accumulated Depreciation			
30	Transmission Accumulated Depreciation	p219.25.c (See Attachment 9, line 16, column e and Attachment 9a, line 42, column g)	0

31	Accumulated General Depreciation		p219.28.c (See attachment 9, line 16, column f)	0
32	Accumulated Intangible Amortization		p200-201.21.c (See Attachment 9, line 16, column h less Attachment 9a, line 42, columns f and g)	0
33	Accumulated Common Amortization - Electric		(Line 11)	0
34	Common Plant Accumulated Depreciation (Electric Only)	(Notes A)	(Line 12)	0
35	Total Accumulated Depreciation		(Sum Lines 31 to 34)	0
36	Wage & Salary Allocation Factor		(Line 5)	#DIV/0!
37	General & Common Allocated to Transmission		(Line 35 * 36)	#DIV/0!
38	TOTAL Accumulated Depreciation		(Line 30 + 37)	#DIV/0!
39	TOTAL Net Property, Plant & Equipment		(Line 29 - 38)	#DIV/0!

Adjustment To Rate Base					
Accumulated Deferred Income Taxes					
40a	Account No. 190 (ADIT)	Projected Activity	(Note W)	Attachment 1A – ADIT Summary, Line 24	#DIV/0!
40b	Account No. 281 (ADIT - Accel. Amort)	Projected Activity	(Note W)	Attachment 1A – ADIT Summary, Line 48	
40c	Account No. 282 (ADIT - Other Property)	Projected Activity	(Note W)	Attachment 1A – ADIT Summary, Line 72	
40d	Account No. 283 (ADIT - Other)	Projected Activity	(Note W)	Attachment 1A – ADIT Summary, Line 96	
40e	Account No. 255 (Accum. Deferred Investment Tax Credits)	Projected Activity	(Note T)	Attachment 1A – ADIT Summary, Line 120	
40f	Accumulated Deferred Income Taxes Allocated To Transmission			Line 40a + 40b + 40c + 40d + 40e	
Unamortized Deficient / (Excess) ADIT					
41a	Unamortized Deficient / (Excess) ADIT (Federal)	Projected Activity	(Note X)	Attachment 1D - ADIT Rate Base Adjustment, Line 76	
41b	Unamortized Deficient / (Excess) ADIT (State)	Projected Activity	(Note X)	Attachment 1D - ADIT Rate Base Adjustment, Line 152	
42	Unamortized Deficient / (Excess) ADIT Allocated to Transmission			Line 41a + 41b	
43	Adjusted Accumulated Deferred Income Taxes Allocated To Transmission			Line 40f + 42	
Unfunded Reserves					
44	Total Reserves Account Balance Attributable to Transmission	Enter Negative		Attachment 5	#DIV/0!
Abandonment Transmission Projects					
44a	Unamortized Abandoned Transmission Projects		(Note R)	Attachment 9, line 30, column h	#DIV/0!
Transmission CWIP in Rate Base					
44b	Transmission CWIP in Rate Base		(Note AB)	Attachment 9, line 30, column b	0
Prepayments					
45	Prepayments		(Note A)	Attachment 9, line 30, column f	#DIV/0!
46	Total Prepayments Allocated to Transmission			(Line 45)	#DIV/0!
Materials and Supplies					
47	Undistributed Stores Exp		(Note A)	p227.6.c & 16.c (See Attachment 9, line 30, column e)	0
48	Wage & Salary Allocation Factor			(Line 5)	#DIV/0!
49	Total Transmission Allocated			(Line 47 * 48)	#DIV/0!
50	Transmission Materials & Supplies		(Note U)	p227.8.c+ p227.5.c (See Attachment 9, line 30, column d)	0
51	Total Materials & Supplies Allocated to Transmission			(Line 49 + 50)	#DIV/0!
Cash Working Capital					
52	Operation & Maintenance Expense			(Line 84)	#DIV/0!
53	1/8th Rule			x 1/8	12.5%
54	Total Cash Working Capital Allocated to Transmission			(Line 52 * 53)	#DIV/0!
Network Credits					
55	Outstanding Network Credits		(Note N)	From PJM	0
56	Less Accumulated Depreciation Associated with Facilities with Outstanding Network Credits		(Note N)	From PJM	0
57	Net Outstanding Credits			(Line 55 - 56)	0
58	TOTAL Adjustment to Rate Base			(Line 43 + 44 + 44a + 44b + 46 + 51 + 54 - 57)	#DIV/0!
59	Rate Base			(Line 39 + 58)	#DIV/0!

O&M

Transmission O&M

60	Transmission O&M		p320-323.112.b	0
61	Less extraordinary property losses		Attachment 5	0
62	Plus amortization of extraordinary property losses		Attachment 5	0
63	Less Account 565		p320-323.96.b	0
64	Plus Schedule 12 payments billed to Transmission Owner and booked to Account 565	(Note O)	PJM Data	0
65	Plus Transmission Lease Payments	(Note A)	P200-201.4.c	0
66	Transmission O&M		(Lines 60 - 61 + 62 - 63 + 64 + 65)	0
Allocated General & Common Expenses				
67	Common Plant O&M	(Note A)	p356	0
68	Total A&G		p320-323.197.b	0
68a	For informational purposes: PBOP expense in FERC Account 926	(Note S)	(Attachment 5)	0
69	Less Property Insurance Account 924		p320-323.185.b	0
70	Less Regulatory Commission Exp Account 928	(Note E)	p320-323.189.b	0
71	Less General Advertising Exp Account 930.1		p320-323.191.b	0
72	Less EPRI Dues	(Note D)	p352-353	0
73	General & Common Expenses		(Lines 67 + 68) - Sum (69 to 72)	0
74	Wage & Salary Allocation Factor		(Line 5)	#DIV/0!
75	General & Common Expenses Allocated to Transmission		(Line 73 * 74)	#DIV/0!
Directly Assigned A&G				
76	Regulatory Commission Exp Account 928	(Note G)	p320-323.189.b	0
77	General Advertising Exp Account 930.1	(Note K)	p320-323.191.b	0
78	Subtotal - Transmission Related		(Line 76 + 77)	0
79	Property Insurance Account 924		p320-323.185.b	0
80	General Advertising Exp Account 930.1	(Note F)	p320-323.191.b	0
81	Total		(Line 79 + 80)	0
82	Gross Plant Allocation Factor		(Line 16)	#DIV/0!
83	A&G Directly Assigned to Transmission		(Line 81 * 82)	#DIV/0!
84	Total Transmission O&M		(Line 66 + 75 + 78 + 83)	#DIV/0!

Depreciation & Amortization Expense

Depreciation Expense				
85	Transmission Depreciation Expense		Attachment 5	0
85a	Transmission Amortization Expense	(Note R)	Attachment 9	#DIV/0!
86	General Depreciation		Attachment 5	0
87	Intangible Amortization	(Note A)	Attachment 5	0
88	Total		(Line 86 + 87)	0
89	Wage & Salary Allocation Factor		Line 5	#DIV/0!
90	General Depreciation Allocated to Transmission		(Line 88 * 89)	#DIV/0!
91	Common Depreciation - Electric Only	(Note A)	Attachment 5	0
92	Common Amortization - Electric Only	(Note A)	Attachment 5	0
93	Total		(Line 91 + 92)	0
94	Wage & Salary Allocation Factor		(Line 5)	#DIV/0!
95	Common Depreciation - Electric Only Allocated to Transmission		(Line 93 * 94)	#DIV/0!
96	Total Transmission Depreciation & Amortization		(Line 85 + 85a + 90 + 95)	#DIV/0!

Taxes Other than Income

97	Taxes Other than Income		Attachment 2	#DIV/0!
98	Total Taxes Other than Income		(Line 97)	#DIV/0!
Return / Capitalization Calculations				
Long Term Interest				
99	Long Term Interest		p114-117.62.c through 67.c	0
100	Less LTD Interest on Securitization Bonds	(Note P)	Attachment 8	0
101	Long Term Interest		(Line 99 - 100)	0
102	Preferred Dividends	enter positive	p118-119.29.c	--
Common Stock				
103	Proprietary Capital		p112-113.16.c	0
104	Less Preferred Stock	enter negative	(Line 113)	0
105	Less Account 216.1	enter negative	p112-113.12.c	0
105a	Less Account 219	enter negative	p112-113.15.c	0
106	Common Stock	(Note Y)	(Sum Lines 103 to 105a)	0
Capitalization				
107	Long Term Debt		p112-113.18.d through 21.d	0
108	Less Loss on Reacquired Debt	enter negative	p110-111.81.c	0
109	Plus Gain on Reacquired Debt	enter positive	p112-113.61.c	0
110	Less ADIT associated with Gain or Loss	enter negative	Attachment 1B – ADIT EOY, Line 7	0
111	Less LTD on Securitization Bonds	(Note P)	Attachment 8	0
112	Total Long Term Debt	(Note Z)	(Sum Lines 107 to 111)	0
113	Preferred Stock	(Note AA)	p112-113.3.c	0
114	Common Stock		(Line 106)	0
115	Total Capitalization		(Sum Lines 112 to 114)	0
116	Debt %	Total Long Term Debt	(Line 112 / 115)	0%
117	Preferred %	Preferred Stock	(Line 113 / 115)	0%
118	Common %	Common Stock	(Line 114 / 115)	0%
119	Debt Cost	Total Long Term Debt	(Line 101 / 112)	0.0000
120	Preferred Cost	Preferred Stock	(Line 102 / 113)	0.0000
121	Common Cost	Common Stock	(Note J) Fixed	0.1050
122	Weighted Cost of Debt	Total Long Term Debt (WCLTD)	(Line 116 * 119)	0.0000
123	Weighted Cost of Preferred	Preferred Stock	(Line 117 * 120)	0.0000
124	Weighted Cost of Common	Common Stock	(Line 118 * 121)	0.0000
125	Total Return ( R )		(Sum Lines 122 to 124)	0.0000
126	Investment Return = Rate Base * Rate of Return		(Line 59 * 125)	#DIV/0!

Composite Income Taxes					
Income Tax Rates					
127	FIT=Federal Income Tax Rate	(Note I)			0.00%
128	SIT=State Income Tax Rate or Composite	(Note I)			0.00%
129	p	(percent of federal income tax deductible for state purposes)	Per State Tax Code		0.00%
130	T	$T=1 - \{[(1 - SIT) * (1 - FIT)] / (1 - SIT * FIT * p)\} =$			0.00%
131	T/ (1-T)				0.00%
132	Tax Gross-Up Factor	1/(1-T)			
Investment Tax Credit Adjustment					
133	Investment Tax Credit Amortization	(Note T)	enter negative	Attachment 1B – ADIT EOY	0
134	Tax Gross-Up Factor [1/(1-T)]			(Line 132)	0.00
135	ITC Adjustment Allocated to Transmission			[Line 133 *134]	#DIV/0!
Other Income Tax Adjustment					
136a	Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense	(Note V)		Attachment 5, Line 136a	0
136b	Amortization Deficient / (Excess) Deferred Taxes (Federal) - Transmission Component	(Note V)		Attachment 5, Line 136b	
136c	Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component	(Note V)		Attachment 5, Line 136c	
136d	Amortization of Other Flow-Through Items - Transmission Component	(Note V)		Attachment 5, Line 136d	
136e	Other Income Tax Adjustments - Expense / (Benefit)			(Line 136a + 136b + 136c + 136d)	
136f	Tax Gross-Up Factor [1/(1-T)]			(Line 132)	
136g	Other Income Tax Adjustment			(Line 136e*136f)	
136h	Income Tax Component =	$CIT=(T/1-T) * Investment\ Return * (1-(WCLTD/R)) =$		[Line 131 * 126 * (1-(122 / 125))]	#DIV/0!
137	Total Income Taxes			(Line 135 + 136g + 136h)	#DIV/0!
REVENUE REQUIREMENT					
Summary					
138	Net Property, Plant & Equipment			(Line 39)	#DIV/0!
139	Adjustment to Rate Base			(Line 58)	#DIV/0!
140	Rate Base			(Line 59)	#DIV/0!
141	O&M			(Line 84)	#DIV/0!
142	Depreciation & Amortization			(Line 96)	#DIV/0!
143	Taxes Other than Income			(Line 98)	#DIV/0!
144	Investment Return			(Line 126)	#DIV/0!
145	Income Taxes			(Line 137)	#DIV/0!
146	Gross Revenue Requirement			(Sum Lines 141 to 145)	#DIV/0!
Adjustment to Remove Revenue Requirements Associated with Excluded Transmission Facilities					
147	Transmission Plant In Service			(Line 19)	0
148	Excluded Transmission Facilities	(Note M)		Attachment 5	0
149	Included Transmission Facilities			(Line 147 - 148)	0
150	Inclusion Ratio			(Line 149 / 147)	#DIV/0!

151	Gross Revenue Requirement		(Line 146)	#DIV/0!
152	Adjusted Gross Revenue Requirement		(Line 150 * 151)	#DIV/0!
Revenue Credits & Interest on Network Credits				
153	Revenue Credits		Attachment 3	-
154	Interest on Network Credits	(Note N)	PJM Data	-
155	Net Revenue Requirement		(Line 152 - 153 + 154)	#DIV/0!
Net Plant Carrying Charge				
156	Net Revenue Requirement		(Line 155)	#DIV/0!
157	Net Transmission Plant and Abandoned Plant		(Line 19 – 30 + 44a)	-
158	Net Plant Carrying Charge		(Line 156 / 157)	#DIV/0!
159	Net Plant Carrying Charge without Depreciation		(Line 156 - 85) / 157	#DIV/0!
160	Net Plant Carrying Charge without Depreciation, Return, nor Income Taxes		(Line 156 - 85 - 126 - 137) / 157	#DIV/0!
Net Plant Carrying Charge Calculation per 100 basis point increase in ROE				
161	Net Revenue Requirement Less Return and Taxes		(Line 155 - 144 - 145)	#DIV/0!
162	Return and Taxes per 100 basis point increase in ROE		Attachment 4	#DIV/0!
163	Net Revenue Requirement per 100 basis point increase in ROE		(Line 161 + 162)	#DIV/0!
164	Net Transmission Plant and Abandoned Plant		(Line 157)	-
165	Net Plant Carrying Charge per 100 basis point increase in ROE		(Line 163 / 164)	#DIV/0!
166	Net Plant Carrying Charge per 100 basis point increase in ROE without Depreciation		(Line 162 - 85) / 164	#DIV/0!
167	Net Revenue Requirement		(Line 155)	#DIV/0!
168	True-up amount		Attachment 6	-
169	Plus any increased ROE calculated on Attachment 7 other than PJM Sch. 12 projects		Attachment 7	-
170	Facility Credits under Section 30.9 of the PJM OATT paid by Utility		Attachment 5	-
171	Net Zonal Revenue Requirement		(Line 167 + 168 + 169+ 170)	#DIV/0!
Network Zonal Service Rate				0
172	1 CP Peak	(Note L)	PJM Data	
173	Rate (\$/MW-Year)	(Note Q)	(Line 171 / 172)	#DIV/0!
174	Network Service Rate (\$/MW/Year)		(Line 173)	#DIV/0!

	Notes
A	Electric portion only
B	Exclude Construction Work In Progress and leases that are expensed as O&M (rather than amortized). New Transmission plant included which is expected to be placed in service in the current calendar year weighted by number of months it is expected to be in-service. For the true-up, new transmission plant which was actually placed in service weighted by the number of months it was actually in service
C	Transmission Portion Only
D	All EPRI Annual Membership Dues
E	All Regulatory Commission Expenses
F	Safety related advertising included in Account 930.1
G	Regulatory Commission Expenses directly related to transmission service, RTO filings, or transmission siting itemized in Form 1 at 351.h.
I	The currently effective income tax rate, where FIT is the Federal income tax rate; SIT is the State income tax rate, and p = "the percentage of federal income tax deductible for state income taxes". If the utility includes taxes in more than one state, it must explain in Attachment 5 the name of each state and how the blended or composite SIT was developed.
J	Per FERC's order in Docket No. ER07-576, the Conastone and Waugh Chapel substation projects get an additional 100 basis points to the return on equity on top of a base ROE of 10.0% per FERC order issued in Docket No. EL13-48 and a 50 basis point RTO transmission planning participation adder approved in Baltimore Gas and Electric Co., Docket No. ER07-576, by order issued on July 24, 2007, for a total ROE of 11.5%. The rest of transmission rate base, except as provided in Note Q below, gets an ROE of 10.5% because it excludes the additional 100 basis points approved solely for the Conastone and Waugh Chapel substation projects.
K	Education and outreach expenses relating to transmission, for example siting or billing
L	As provided for in Section 34.1 of the PJM OATT and the PJM established billing determinants will not be revised or updated in the annual rate reconciliations per settlement in ER05-515.
M	Amount of transmission plant excluded from rates, includes investment in generation step-up transformers to the extent included in Plant in Service.
N	Outstanding Network Credits is the balance of Network Facilities Upgrades Credits due Transmission Customers who have made lump-sum payments (net of accumulated depreciation) towards the construction of Network Transmission Facilities consistent with Paragraph 657 of Order 2003-A.  Interest on the Network Credits as booked each year is added to the revenue requirement to make the Transmission Owner whole on Line 154.
O	Payments made under Schedule 12 of the PJM OATT that are not directly assessed to load in the zone under Schedule 12 are included in Transmission O&M. If they are booked to account 565, they are included in on line 64.
P	Securitization bonds may be included in the capital structure per settlement in ER05-515.
Q	On November 16, 2007, the Federal Energy Regulatory Commission (FERC) granted Baltimore Gas and Electric (BGE) in Docket No. ER07-576 incentive rate treatment for 6 projects designated in the PJM Regional Transmission Expansion Plan (RTEP) as Transmission Owner Initiated (TOI). Specifically, FERC granted an additional 100 basis points to the return on equity (ROE) for these projects, resulting in a final ROE, for these projects, of 11.5%, inclusive of a base ROE of 10.0% per FERC order issued in Docket No. EL13-48 and a 50 basis point ROE transmission planning adder approved in Baltimore Gas and Electric Co., Docket No. ER07-576, by order issued on July 24, 2007.
R	Costs of Unamortized Abandoned Plant and Amortization of Abandoned Plant for Dedicated Facilities pre-approved for inclusion in this cell subject to Formula Rate Protocols by Commission order issued in PJM Interconnection, LLC and Baltimore Gas and Electric Co., 150 FERC ¶ 61,054 (2015). Costs of Unamortized Abandoned Plant and Amortization of Abandoned Plant for Mid-Atlantic Power Pathway (MAPP) approved for inclusion in this cell subject to Formula Rate Protocols by Commission order issued in PJM Interconnection, L.L.C. and Baltimore Gas and Electric Co., 152 FERC ¶ 61,254 (2015). Costs of Unamortized Abandoned Plant and Amortization of Abandoned Plant for Project Baseline Upgrades b1254 and b1254.1 ("b1254") approved for inclusion in this cell subject to Formula Rate Protocols by Commission order issued in PJM Interconnection, L.L.C. and Baltimore Gas and Electric Co., XXX FERC ¶XX1,XXX (XXXX).
S	See Attachment 5, Cost Support, section entitled "PBOP expense in FERC Account 926 " for additional information per FERC orders in Docket Nos. EL13-48, EL15-27, and ER16-456.
T	Baltimore Gas and Electric Company elected to amortize investment tax credits against recoverable income tax expense, rather than to reduce rate base by unamortized investment tax credit. Amortization reduces income tax expense and reduces the revenue requirement by the amount of the Investment Tax Credit Amortization multiplied by (1/1-T).
U	Only the transmission portion of amounts reported at Form 1, page 227, line 5 is used. The transmission portion of line 5 is specified in a footnote to the Form 1, page 227.
V	See Attachment 5 - Cost Support, section entitled "Other Income Tax Adjustment" for additional information.
W	The Accumulated Deferred Income Tax (ADIT) balances in Accounts 190, 281, 282, and 283 are measured using the enacted tax rate that is expected to apply when the underlying temporary differences are expected to be settled or realized. To preserve rate base neutrality, theses balances appropriately exclude ADIT amounts associated with income tax related regulatory assets and liabilities. The balances in Accounts 190, 281, 282 and 283 are adjusted in accordance with Treasury regulation Section 1.167(l)-1(h)(6) and averaged in accordance with IRC Section 168(i)(9)(B) in the calculations of rate base in the projected revenue requirement and in the true-up adjustment. Differences attributable to over-projection of ADIT in the projected revenue requirement will result in a proportionate reversal of the projected prorated ADIT activity in the true-up adjustment to the extent of the over-projection. Differences attributable to under-projection of ADIT in the projected revenue requirement will result in an adjustment to the projected prorated ADIT activity by 50 percent of the difference between the projected monthly activity and the actual monthly activity. However, when projected monthly ADIT activity is an increase and actual monthly ADIT activity is a decrease, 50 percent of the actual monthly ADIT activity will be used. Likewise, when projected monthly ADIT activity is a decrease and actual monthly ADIT activity is an increase, 50 percent of actual monthly ADIT activity will be used. For the Annual Update (Projected) filing, see Attachment 1A - ADIT Summary, Column H for inputs. For the Annual Update (True-Up) filing, See Attachment 1A - ADIT Summary, Column M for inputs.
X	These balances represent the unamortized federal and state deficient / (excess) deferred income taxes. To preserve rate base neutrality and consistent with the exclusion of ADIT amounts associated with income tax-related regulatory assets and liabilities as described in Note W, regulatory assets and liabilities for deficient and excess ADIT are reflected without tax gross-up. For the Annual Update (Projected) filing, see Attachment 1D - ADIT Rate Base Adjustment, Column C for inputs. For the Annual Update (True-Up) filing, See Attachment 1D - ADIT Rate Base Adjustment, Column F for inputs.
Y	Common Stock balance will reflect the 13 month average of the balances, of which the 1st and 13th are found on page 112 lines 16.c & d in the Form No. 1. The balances for January through November shall represent the actual balances in BGE's books and records (trial balance or monthly balance sheet).
Z	Long Term Debt balance will reflect the 13 month average of the balances, of which the 1st and 13th are found on page 112 lines 18.c & d to 21.c & d in the Form No. 1. The balances for January through November shall represent the actual balances in BGE's books and records (trial balance or monthly balance sheet).
AA	Preferred Stock balance will reflect the 13 month average of the balances, of which the 1st and 13th are found on page 112 line 3.c & d in the Form No. 1. The balances for January through November shall represent the actual balances in BGE's books and records (trial balance or monthly balance sheet).
AB	Effective October 1, 2025, Construction Work in Progress ("CWIP") is included in rate base for the 2022 Regional Transmission Expansion Plan Window 3 project ("Window 3 Project") only, as authorized in FERC Docket No. ER25-XXXX-XXX.
ZZ	The revisions made in the Order No. 864 Cleanup Filing will not require any adjustment to rates or annual update filings for rates charged and annual updates filings made prior to the date of the order accepting the revised tariff sheets.

Baltimore Gas and Electric  
Accumulated Deferred Income Taxes (ADIT) - Transmission Allocated  
Attachment 1A - ADIT Summary

Rate Year  
=

Accumulated Deferred Income  
Taxes (Account No. 190)

Line	Days in Period					Projection - Proration of Deferred Tax Activity (Note A)			Actual - Proration of Deferred Tax Activity (Note B)				
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
	Month	Days Per Month	Remaining Days Per Month	Total Days in Future Test Period	Proration Amount (Column C / Column D)	Projected Monthly Activity	Prorated Projected Monthly Activity (Column E x Column F)	Prorated Projected Balance (Col. G Plus Col. H, Preceding Balance)	Actual Monthly Activity	Difference Projected vs. Actual (Note C)	Preserve Proration (Actual vs Projected) (Note D)	Preserve Proration (Actual vs Projected) (Note E)	Preserved Prorated Actual Balance (Col. K + Col. L + Col. M, Preceding Balance)
1	ADIT Subject to Proration					[Insert Date]		-	[Insert Date]				-
2	Projected / Actual Activity					[Insert Date]			[Insert Date]				
3	January				50.00%	-	-	-	-	-	-	-	-
4	February				50.00%	-	-	-	-	-	-	-	-
5	March				50.00%	-	-	-	-	-	-	-	-
6	April				50.00%	-	-	-	-	-	-	-	-
7	May				50.00%	-	-	-	-	-	-	-	-
8	June				50.00%	-	-	-	-	-	-	-	-
9	July				50.00%	-	-	-	-	-	-	-	-
10	August				50.00%	-	-	-	-	-	-	-	-
11	September				50.00%	-	-	-	-	-	-	-	-
12	October				50.00%	-	-	-	-	-	-	-	-
13	November				50.00%	-	-	-	-	-	-	-	-
14	December				50.00%	-	-	-	-	-	-	-	-

15	Total (Sum of Lines 3 - 14)	-	-	-	-	-	-
16	Beginning Balance - ADIT Not Subject to Proration	[Insert Date]	-	[Insert Date]	-		
17	Beginning Balance - ADIT Adjustment	(Note F)	-		-		
18	Beginning Balance - DTA / (DTL)	(Col. (H), Line 16 + Line 17)	-	(Col. (M), Line 16 + Line 17)	-		
19	Ending Balance - ADIT Not Subject to Proration	[Insert Date]	#DIV/0!	[Insert Date]	-		
20	Ending Balance - ADIT Adjustment	(Note F)	-		-		
21	Ending Balance - DTA / (DTL)	(Col. (H), Line 19 + Line 20)	#DIV/0!	(Col. (M), Line 19 + Line 20)	-		
22	Average Balance as adjusted (non-prorated)	([Col. (H), Line 18 + Line 21] / 2)	#DIV/0!	([Col. (M), Line 18 + Line 21] / 2)	-		
23	Prorated ADIT	(Col. (H), Line 14 )	-	(Col. (M), Line 14 )	-		
24	Amount for Attachment H-2A, Line 40a	(Col. (H), Line 22 + Line 23)	#DIV/0!	(Col. (M), Line 22 + Line 23)	-		

Days in Period					Projection - Proration of Deferred Tax Activity (Note A)			Actual - Proration of Deferred Tax Activity (Note B)				
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
Month	Days Per Month	Prorated Days Per Month	Total Days Per Future Test Period	Proration Amount (Column C / Column D)	Projected Monthly Activity	Prorated Projected Monthly Activity (Column E x Column F)	Prorated Projected Balance (Col. G Plus Col. H, Preceding Balance)	Actual Monthly Activity	Difference Projected vs. Actual (Note C)	Preserve Proration (Actual vs Projected) (Note D)	Preserve Proration (Actual vs Projected) (Note E)	Preserved Prorated Actual Balance (Col. K + Col. L + Col. M, Preceding Balance)

25	ADIT Subject to Proration	[Insert Date]	-	[Insert Date]	-		
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26	Projected / Actual Activity			[Insert Date]			[Insert Date]			
27	January		50.00%		-	-	-	-	-	-
28	February		50.00%		-	-	-	-	-	-
29	March		50.00%		-	-	-	-	-	-
30	April		50.00%		-	-	-	-	-	-
31	May		50.00%		-	-	-	-	-	-
32	June		50.00%		-	-	-	-	-	-
33	July		50.00%		-	-	-	-	-	-
34	August		50.00%		-	-	-	-	-	-
35	September		50.00%		-	-	-	-	-	-
36	October		50.00%		-	-	-	-	-	-
37	November		50.00%		-	-	-	-	-	-
38	December		50.00%		-	-	-	-	-	-
39	Total (Sum of Lines 27 - 38)	-		-	-	-	-	-	-	-
40	Beginning Balance - ADIT Not Subject to Proration			[Insert Date]	-		[Insert Date]			-
41	Beginning Balance - ADIT Adjustment			(Note F)	-					-
42	Beginning Balance - DTA / (DTL)			(Col. (H), Line 40 + Line 41)	-		(Col. (M), Line 40 + Line 41)			-
43	Estimated Ending Balance - ADIT Not Subject to Proration			[Insert Date]	-		[Insert Date]			-
44	Ending Balance - ADIT Adjustment			(Note F)	-					-
45	Ending Balance - DTA / (DTL)			(Col. (H), Line 43 + Line 44)	-		(Col. (M), Line 43 + Line 44)			-
46	Average Balance as adjusted (non-prorated)			((Col. (H), Line 42 + Line 45] /2)	-		((Col. (M), Line 42 + Line 45] /2)			-

47	Prorated ADIT	(Col. (H), Line 38 )	-	(Col. (M), Line 38 )	-
48	Amount for Attachment H-2A, Line 40b	(Col. (H), Line 46 + Line 47)	-	(Col. (M), Line 46 + Line 47)	-

Accumulated Deferred Income Taxes - Property (Account No. 282)

Line	Days in Period					Projection - Proration of Deferred Tax Activity (Note A)			Actual - Proration of Deferred Tax Activity (Note B)				
	(A) Month	(B) Days Per Month	(C) Prorated Days Per Month	(D) Total Days Per Future Test Period	(E) Proration Amount (Column C / Column D)	(F) Projected Monthly Activity	(G) Prorated Projected Monthly Activity (Column E x Column F)	(H) Prorated Projected Balance (Col. G Plus Col. H, Preceding Balance)	(I) Actual Monthly Activity	(J) Difference Projected vs. Actual (Note C)	(K) Preserve Proration (Actual vs Projected) (Note D)	(L) Preserve Proration (Actual vs Projected) (Note E)	(M) Preserved Prorated Actual Balance (Col. K + Col. L + Col. M, Preceding Balance)
49	ADIT Subject to Proration					[Insert Date]		-	[Insert Date]				-
50	Projected / Actual Activity					[Insert Date]			[Insert Date]				
51	January				50.00%		-	-	-	-	-	-	-
52	February				50.00%		-	-	-	-	-	-	-
53	March				50.00%		-	-	-	-	-	-	-
54	April				50.00%		-	-	-	-	-	-	-
55	May				50.00%		-	-	-	-	-	-	-
56	June				50.00%		-	-	-	-	-	-	-
57	July				50.00%		-	-	-	-	-	-	-
58	August				50.00%		-	-	-	-	-	-	-
59	September				50.00%		-	-	-	-	-	-	-
60	October				50.00%		-	-	-	-	-	-	-
61	November				50.00%		-	-	-	-	-	-	-
62	December				50.00%		-	-	-	-	-	-	-

63	Total (Sum of Lines 51 - 62)	-	-	-	-	-	-	-	-
64	Beginning Balance - ADIT Not Subject to Proration	[Insert Date]	-		[Insert Date]				-
65	Beginning Balance - ADIT Depreciation Adjustment	(Note F)	-						-
66	Beginning Balance - DTA / (DTL)	(Col. (H), Line 64 + Line 65)	-		(Col. (M), Line 64 + Line 65)				-
67	Estimated Ending Balance - ADIT Not Subject to Proration	[Insert Date]	#DIV/0!		[Insert Date]				-
68	Ending Balance - ADIT Depreciation Adjustment	(Note F)	-						-
69	Ending Balance - DTA / (DTL)	(Col. (H), Line 67 + Line 68)	#DIV/0!		(Col. (M), Line 67 + Line 68)				-
70	Average Balance as adjusted (non-prorated)	([Col. (H), Line 66 + Line 69] /2)	#DIV/0!		([Col. (M), Line 66 + Line 69] /2)				-
71	Prorated ADIT	(Col. (H), Line 62 )	-		(Col. (M), Line 62 )				-
72	Amount for Attachment H-2A, Line 40c	(Col. (H), Line 70 + Line 71)	#DIV/0!		(Col. (M), Line 70 + Line 71)				-

Accumulated Deferred Income Taxes - Other (Account No. 283)													
Line	Days in Period				Projection - Proration of Deferred Tax Activity (Note A)			Actual - Proration of Deferred Tax Activity (Note B)					
	(A) Month	(B) Days Per Month	(C) Prorated Days Per Month	(D) Total Days Per Future Test Period	(E) Proration Amount (Column C / Column D)	(F) Projected Monthly Activity	(G) Prorated Projected Monthly Activity (Column E x Column F)	(H) Prorated Projected Balance (Col. G Plus Col. H, Preceding Balance)	(I) Actual Monthly Activity	(J) Difference Projected vs. Actual (Note C)	(K) Preserve Proration (Actual vs Projected) (Note D)	(L) Preserve Proration (Actual vs Projected) (Note E)	(M) Preserved Prorated Actual Balance (Col. K + Col. L + Col. M, Preceding Balance)
73	ADIT Subject to Proration					[Insert Date]	-		[Insert Date]				-
74	Projected / Actual Activity					[Insert Date]			[Insert Date]				

75	January		50.00%	-	-	-	-	-	-	-
76	February		50.00%	-	-	-	-	-	-	-
77	March		50.00%	-	-	-	-	-	-	-
78	April		50.00%	-	-	-	-	-	-	-
79	May		50.00%	-	-	-	-	-	-	-
80	June		50.00%	-	-	-	-	-	-	-
81	July		50.00%	-	-	-	-	-	-	-
82	August		50.00%	-	-	-	-	-	-	-
83	September		50.00%	-	-	-	-	-	-	-
84	October		50.00%	-	-	-	-	-	-	-
85	November		50.00%	-	-	-	-	-	-	-
86	December		50.00%	-	-	-	-	-	-	-
87	Total (Sum of Lines 75 - 86)			-	-		-	-	-	-
88	Beginning Balance - ADIT Not Subject to Proration			[Insert Date]		-	[Insert Date]		-	
89	Beginning Balance - ADIT Adjustment			(Note F)		-			-	
90	Beginning Balance - DTA / (DTL)			(Col. (H), Line 88 + Line 89)		-	(Col. (M), Line 88 + Line 89)		-	
91	Estimated Ending Balance - ADIT Not Subject to Proration			[Insert Date]		#DIV/0!	[Insert Date]		-	
92	Ending Balance - ADIT Adjustment			(Note F)		-			-	
93	Ending Balance - DTA / (DTL)			(Col. (H), Line 91 + Line 92)		#DIV/0!	(Col. (M), Line 91 + Line 92)		-	
94	Average Balance as adjusted (non-prorated)			([Col. (H), Line 90 + Line 93] /2)		#DIV/0!	([Col. (M), Line 90 + Line 93] /2)		-	
95	Prorated ADIT			(Col. (H), Line 86 )		-	(Col. (M), Line 86 )		-	

96	Amount for Attachment H-2A, Line 40d	(Col. (H), Line 94 + Line 95)			#DIV/0!	(Col. (M), Line 94 + Line 95)			-				
	Accumulated Deferred Investment Tax Credits (Account No. 255)												
Line	Days in Period					Projection - Proration of Deferred ITC Activity (Note A)			Actual - Proration of Deferred ITC Activity (Note B)				
	(A)  Month	(B)  Days Per Month	(C)  Prorated Days Per Month	(D)  Total Days Per Future Test Period	(E)  Proration Amount (Column C / Column D)	(F)  Projected Monthly Activity	(G)  Prorated Projected Monthly Activity (Column E x Column F)	(H)  Prorated Projected Balance (Col. G Plus Col. H, Preceding Balance)	(I)  Actual Monthly Activity	(J)  Difference Projected vs. Actual (Note C)	(K)  Preserve Proration (Actual vs Projected) (Note D)	(L)  Preserve Proration (Actual vs Projected) (Note E)	(M)  Preserved Prorated Actual Balance (Col. K + Col. L + Col. M, Preceding Balance)
97	DITC Subject to Proration					[Insert Date]		-	[Insert Date]				-
98	Projected / Actual Activity					[Insert Date]			[Insert Date]				
99	January				50.00%	-	-	-	-	-	-	-	-
100	February				50.00%	-	-	-	-	-	-	-	-
101	March				50.00%	-	-	-	-	-	-	-	-
102	April				50.00%	-	-	-	-	-	-	-	-
103	May				50.00%	-	-	-	-	-	-	-	-
104	June				50.00%	-	-	-	-	-	-	-	-
105	July				50.00%	-	-	-	-	-	-	-	-
106	August				50.00%	-	-	-	-	-	-	-	-
107	September				50.00%	-	-	-	-	-	-	-	-
108	October				50.00%	-	-	-	-	-	-	-	-
109	November				50.00%	-	-	-	-	-	-	-	-
110	December				50.00%	-	-	-	-	-	-	-	-
111	Total (Sum of Lines 99 - 110)	-				-	-		-	-	-	-	

112	Beginning Balance - DITC Not Subject to Proration	[Insert Date]	-	[Insert Date]	-
113	Beginning Balance - DITC Adjustment	(Note F)	-		-
114	Beginning Balance - DITC	(Col. (H), Line 112 + Line 113)	-	(Col. (M), Line 112 + Line 113)	-
115	Estimated Ending Balance - DITC Not Subject to Proration	[Insert Date]	-	[Insert Date]	-
116	Ending Balance - DITC Adjustment	(Note F)	-		-
117	Ending Balance - DITC	(Col. (H), Line 115 + Line 116)	-	(Col. (M), Line 115 + Line 116)	-
118	Average Balance as adjusted (non-prorated)	((Col. (H), Line 114 + Line 117) /2)	-	((Col. (M), Line 114 + Line 117) /2)	-
119	Prorated DITC	(Col. (H), Line 110 )	-	(Col. (M), Line 110 )	-
120	<b>Amount for Attachment H-2A, Line 40e</b>	(Col. (H), Line 118 + Line 119)	-	(Col. (M), Line 118 + Line 119)	-

Instructions

1. For purposes of calculating transmission allocated projected activity, use Columns (F), (G), and (H) and set the "Rate Year" below to "Projected Activity". For purposes of calculating the "True-Up" adjustment, use Columns (I), (J), (K), (L), and (M) and set the "Rate Year" below to "True-Up Adjustment".

Rate Year

Projected Activity

Check

2. For the Annual Update (Projected) filing, see Attachment 1A - ADIT Summary, Column H for inputs. For the Annual Update (True-Up) filing, See Attachment 1A - ADIT Summary, Column M for inputs.

Notes

- A

The computations on this worksheet apply the proration rules of Reg. Sec. 1.167(l)-1(h)(6) to the annual activity of accumulated deferred income taxes subject to the normalization requirements . Activity related to the portions of the account balances not subject to the proration requirement are averaged instead of prorated. For accumulated deferred income taxes subject to the normalization requirements, activity for months prior to the future portion of the test period is averaged rather than prorated. This section is used to prorate the projected ADIT balance.
- B

The balances in Accounts 190, 281, 282 and 283 are adjusted in accordance with Treasury regulation Section 1.167(l)-1(h)(6) and averaged in accordance with IRC Section 168(i)(9)(B) in the calculations of rate base in the projected revenue requirement and in the true-up adjustment.

Differences attributable to over-projection of ADIT in the projected revenue requirement will result in a proportionate reversal of the projected prorated ADIT activity in the true-up adjustment to the extent of the over-projection. Differences attributable to under-projection of ADIT in the projected revenue requirement will result in an adjustment to the projected prorated ADIT activity by 50 percent of the difference between the projected monthly activity and the actual monthly activity. However, when projected monthly ADIT activity is an increase and actual monthly ADIT activity is a decrease, 50 percent of the actual monthly ADIT activity will be used. Likewise, when projected monthly ADIT activity is a decrease and actual monthly ADIT activity is an increase, 50 percent of actual monthly ADIT activity will be used. This section is used to calculate ADIT activity in the true-up adjustment only.

- C** Column J is the difference between projected monthly and actual monthly activity (Column I minus Column F). Specifically, if projected and actual activity are both positive, a negative in Column J represents over-projection (amount of projected activity that did not occur) and a positive in Column J represents under-projection (excess of actual activity over projected activity). If projected and actual activity are both negative, a negative in Column J represents under-projection (excess of actual activity over projected activity) and a positive in Column J represents over-projection (amount of projected activity that did not occur).
- D** Column K preserves proration when actual monthly and projected monthly activity are either both increases or decreases. Specifically, if Column J is over-projected, enter Column G x [Column I/Column F]. If Column J is under-projected, enter the amount from Column G and complete Column L). In other situations, enter zero.
- E** Column L applies when (1) Column J is under-projected AND (2) actual monthly and projected monthly activity are either both increases or decreases. Enter the amount from Column J. In other situations, enter zero.
- F** This section is reserved for adjustments necessary to comply with the IRS normalization rules.

**Baltimore Gas and Electric  
Accumulated Deferred Income Taxes (ADIT)  
Attachment 1B - ADIT Worksheet - End of Year**

Line	ADIT (Not Subject to Proration)	Gas, Production, Distribution, or Only Transmission Plant Labor				
		Total	Other Related	Related	Related	Related
1	ADIT-190	#DIV/0!	-	-	#DIV/0!	#DIV/0!
2	ADIT-281	-	-	-	-	-
3	ADIT-282	#DIV/0!	-	-	#DIV/0!	#DIV/0!
4	ADIT-283	#DIV/0!	-	-	#DIV/0!	#DIV/0!
5	ADITC-255	#DIV/0!	-	-	#DIV/0!	#DIV/0!
6	Subtotal - Transmission ADIT	#DIV/0!	-	-	#DIV/0!	#DIV/0!

Line	Description	Total
7	ADIT (Reacquired Debt)	

Note: ADIT associated with Gain or Loss on Reacquired Debt included in ADIT-283, Column B is excluded from rate base and instead included in Cost of Debt on Attachment H-2A, Line 110. A deferred tax (liability) should be reported as a positive balance and a deferred tax asset should be reported as a negative balance on Attachment H-2A, Line 110. The ADIT balance is based on the 13-month average.

In filling out this attachment, a full and complete description of each item and justification for the allocation to Columns B - F and each separate ADIT item will be listed, dissimilar items with amounts exceeding \$100,000 will be listed separately.

(A)	(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADIT-190 (Not Subject to Proration)	Total					



Subtotal: ADIT-190 (Subject to Proration)		-	-	-	-	-	
Less: ASC 740 ADIT Adjustments excluded from rate base							
Less: ASC 740 ADIT Adjustments related to unamortized ITC							
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-190 (Subject to Proration)		-	-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
ADIT - Transmission		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)	(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADIT-190	Total					
ADIT-190 (Not Subject to Proration)	-	-	-	-	-	
ADIT-190 (Subject to Proration)	-	-	-	-	-	
Total - FERC Form 1, Page 234	-	-	-	-	-	

Instructions for Account 190:  
1. ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C  
2. ADIT items related only to Transmission are directly assigned to Column D

3. ADIT items related to Plant and not in Columns C & D are included in Column E
4. ADIT items related to labor and not in Columns C & D are included in Column F
5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded.
6. ADIT items subject to the proration under the "normalization" rules will be included in ADIT-190 (Subject to Proration)

(A)		(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G)
ADIT- 282 (Not Subject to Proration)		Total					Justification
<b>Subtotal: ADIT-282 (Not Subject to Proration)</b>		-	-	-	-	-	
Less: ASC 740 ADIT Adjustments excluded from rate base							
Less: ASC 740 ADIT Adjustments related to AFUDC Equity							
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
<b>Total: ADIT-282 (Not Subject to Proration)</b>		-	-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
<b>ADIT - Transmission</b>		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)	(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
<b>ADIT-282 (Subject to Proration)</b>	<b>Total</b>					
<b>Subtotal: ADIT-282 (Subject to Proration)</b>	-	-	-	-	-	
Less: ASC 740 ADIT Adjustments excluded from rate base						
Less: ASC 740 ADIT Adjustments related to unamortized ITC						
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)						
Less: OPEB related ADIT, Above if not separately removed						
<b>Total: ADIT-282 (Subject to Proration)</b>	-	-	-	-	-	
Wages & Salary Allocator					#DIV/0!	
Gross Plant Allocator				#DIV/0!		
Transmission Allocator			100.00%			
Other Allocator		0.00%				
<b>ADIT - Transmission</b>	#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)	(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
<b>ADIT-282</b>	<b>Total</b>					
ADIT-282 (Not Subject to Proration)	-	-	-	-	-	
ADIT-282 (Subject to Proration)	-	-	-	-	-	
<b>Total - FERC Form 1, Page 274-275</b>	-	-	-	-	-	

**1. ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C**

**3. ADIT items related to Plant and not in Columns C & D are included in Column E**

5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded.

[illegible]

Subtotal: ADIT-283 (Not Subject to Proration)		-	-	-	-	-	
Less: ASC 740 ADIT Adjustments excluded from rate base							
Less: ASC 740 ADIT Adjustments related to unamortized ITC							
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-283 (Not Subject to Proration)		-	-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
ADIT - Transmission		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)	(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADIT- 283 (Subject to Proration)	Total					
Subtotal: ADIT-283 (Subject to Proration)	-	-	-	-	-	
Less: ASC 740 ADIT Adjustments excluded from rate base						
Less: ASC 740 ADIT Adjustments related to unamortized ITC						

Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-283 (Subject to Proration)		-	-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
ADIT - Transmission		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)	(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADIT-283	Total					
ADIT-283 (Not Subject to Proration)	-	-	-	-	-	
ADIT-283 (Subject to Proration)	-	-	-	-	-	
Total - FERC Form 1, Page 276-277	-	-	-	-	-	

Instructions for Account 283:

1. ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C

2. ADIT items related only to Transmission are directly assigned to Column D

3. ADIT items related to Plant and not in Columns C & D are included in Column E

4. ADIT items related to labor and not in Columns C & D are included in Column F

5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded

6. ADIT items subject to the proration under the "normalization" rules will be included in ADIT-283 (Subject to Proration)

(A)		(B)	(C)	(D)	(E)	(F)	(G)
ADITC-255 (Unamortized Investment Tax Credits)		Total	Gas, Production, Distribution, or Other Related	Only Transmission Related	Plant Related	Labor Related	Justification
Total - FERC Form 1, Page 266-267		-	-	-	-	-	
Total: ADIT-255		-	-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
Unamortized Investment Tax Credit - Transmission		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)		(B)	(C)	(D)	(E)	(F)	(G)
Investment Tax Credit Amortization		Total	Gas, Production, Distribution, or Other Related	Only Transmission Related	Plant Related	Labor Related	Justification
		-					

Total - FERC Form 1, Page 266-267			-	-	-	-	-	
Total: Investment Tax Credit Adjustments								
Wages & Salary Allocator							#DIV/0!	
Gross Plant Allocator						#DIV/0!		
Transmission Allocator					100.00%			
Other Allocator				0.00%				
Investment Tax Credit Amortization - Transmission			#DIV/0!	-	-	#DIV/0!	#DIV/0!	

END

## ATTACHMENT E

Baltimore Gas and Electric Company				
Formula Rate		Notes	FERC Form 1 Page # or Instruction	
Shaded cells are input cells				
Allocators				
Wages & Salary Allocation Factor				
1	Direct Transmission Wages Expense		p354-355.21.b	0
1a	Exelon Business Services Company Transmission Wages Expense		p354 - p355 footnotes	0
1b	Total Transmission Wages Expense		(Line 1 + 1a)	0
2	Total Direct Wages Expense		p354-355.28.b	0
2a	Total Exelon Business Services Company Wages Expense		p354 - p355 footnotes	0
2b	Total Wages Expense		(Line 2 + 2a)	0
3	Less Direct A&G Wages Expense		p354-355.27.b	0
3a	Less Exelon Business Services Company A&G Wages Expense		p354 - p355 footnotes	0
4	Total		(Line 2b - 3 - 3a)	0
5	Wages & Salary Allocator		(Line 1b / 4)	#DIV/0!
Plant Allocation Factors				
6	Electric Plant In Service		p204-207.104.g (See Attachment 9A, line 14, column n)	0
7	Common Plant In Service - Electric	(Note A)	(Line 24)	0
8	Total Plant In Service		(Sum Lines 6 & 7)	0
9	Accumulated Depreciation (Total Electric Plant)		p219.29.c (See Attachment 9A, line 42, column b)	0
10	Accumulated Intangible Amortization	(Note A)	p200-201.21.c (See Attachment 9, line 16, column h)	0
11	Accumulated Common Amortization - Electric	(Note A)	p356 (See Attachment 9, line 16, column i)	0
12	Accumulated Common Plant Depreciation - Electric	(Note A)	p356 (See Attachment 9, line 16, column g)	0
13	Total Accumulated Depreciation		(Sum Lines 9 to 12)	0
14	Net Plant		(Line 8 - 13)	0
15	Transmission Gross Plant		(Line 29 - Line 28)	#DIV/0!
16	Gross Plant Allocator		(Line 15 / 8)	#DIV/0!
17	Transmission Net Plant		(Line 39 - Line 28)	#DIV/0!
18	Net Plant Allocator		(Line 17 / 14)	#DIV/0!
Plant Calculations				
Plant In Service				
19	Transmission Plant In Service		p204-207.58.g (See Attachment 9, line 16, column b and Attachment 9a, line 14, column f)	0
20	This Line Intentionally Left Blank	This Line Intentionally Left Blank		0
21	This Line Intentionally Left Blank	This Line Intentionally Left Blank		0
22	Total Transmission Plant In Service		(Line 19)	0
23	General & Intangible		P204-207.5.g & p204-207.99.g (See Attachment 9, line 16, column c less Attachment 9a, line 14, columns q and r)	0
24	Common Plant (Electric Only)	(Notes A)	p356 (See Attachment 9, line 16, column d)	0
25	Total General & Common		(Line 23 + 24)	0
26	Wage & Salary Allocation Factor		(Line 5)	#DIV/0!
27	General & Common Plant Allocated to Transmission		(Line 25 * 26)	#DIV/0!
28	Plant Held for Future Use (Including Land)	(Note C)	p214 (Attachment 9, line 30, column c)	0
29	TOTAL Plant In Service		(Line 22 + 27 + 28)	#DIV/0!
Accumulated Depreciation				
30	Transmission Accumulated Depreciation		p219.25.c (See Attachment 9, line 16, column e and Attachment 9a, line 42, column g)	0

31	Accumulated General Depreciation		p219.28.c (See attachment 9, line 16, column f)	0
32	Accumulated Intangible Amortization		p200-201.21.c (See Attachment 9, line 16, column h less Attachment 9a, line 42, columns f and g)	0
33	Accumulated Common Amortization - Electric		(Line 11)	0
34	Common Plant Accumulated Depreciation (Electric Only)	(Notes A)	(Line 12)	0
35	Total Accumulated Depreciation		(Sum Lines 31 to 34)	0
36	Wage & Salary Allocation Factor		(Line 5)	#DIV/0!
37	General & Common Allocated to Transmission		(Line 35 * 36)	#DIV/0!
38	TOTAL Accumulated Depreciation		(Line 30 + 37)	#DIV/0!
39	TOTAL Net Property, Plant & Equipment		(Line 29 - 38)	#DIV/0!

Adjustment To Rate Base					
Accumulated Deferred Income Taxes					
40a	Account No. 190 (ADIT)	Projected Activity	(Note W)	Attachment 1A – ADIT Summary, Line 24	#DIV/0!
40b	Account No. 281 (ADIT - Accel. Amort)	Projected Activity	(Note W)	Attachment 1A – ADIT Summary, Line 48	
40c	Account No. 282 (ADIT - Other Property)	Projected Activity	(Note W)	Attachment 1A – ADIT Summary, Line 72	
40d	Account No. 283 (ADIT - Other)	Projected Activity	(Note W)	Attachment 1A – ADIT Summary, Line 96	
40e	Account No. 255 (Accum. Deferred Investment Tax Credits)	Projected Activity	(Note T)	Attachment 1A – ADIT Summary, Line 120	
40f	Accumulated Deferred Income Taxes Allocated To Transmission			Line 40a + 40b + 40c + 40d + 40e	
Unamortized Deficient / (Excess) ADIT					
41a	Unamortized Deficient / (Excess) ADIT (Federal)	Projected Activity	(Note X)	Attachment 1D - ADIT Rate Base Adjustment, Line 76	
41b	Unamortized Deficient / (Excess) ADIT (State)	Projected Activity	(Note X)	Attachment 1D - ADIT Rate Base Adjustment, Line 152	
42	Unamortized Deficient / (Excess) ADIT Allocated to Transmission			Line 41a + 41b	
43	Adjusted Accumulated Deferred Income Taxes Allocated To Transmission			Line 40f + 42	
Unfunded Reserves					
44	Total Reserves Account Balance Attributable to Transmission	Enter Negative		Attachment 5	#DIV/0!
Abandonment Transmission Projects					
44a	Unamortized Abandoned Transmission Projects		(Note R)	Attachment 9, line 30, column h	#DIV/0!
Transmission CWIP in Rate Base					
44b	Transmission CWIP in Rate Base		(Note AB)	Attachment 9, line 30, column b	0
Prepayments					
45	Prepayments		(Note A)	Attachment 9, line 30, column f	#DIV/0!
46	Total Prepayments Allocated to Transmission			(Line 45)	#DIV/0!
Materials and Supplies					
47	Undistributed Stores Exp		(Note A)	p227.6.c & 16.c (See Attachment 9, line 30, column e)	0
48	Wage & Salary Allocation Factor			(Line 5)	#DIV/0!
49	Total Transmission Allocated			(Line 47 * 48)	#DIV/0!
50	Transmission Materials & Supplies		(Note U)	p227.8.c+ p227.5.c (See Attachment 9, line 30, column d)	0
51	Total Materials & Supplies Allocated to Transmission			(Line 49 + 50)	#DIV/0!
Cash Working Capital					
52	Operation & Maintenance Expense			(Line 84)	#DIV/0!
53	1/8th Rule			x 1/8	12.5%
54	Total Cash Working Capital Allocated to Transmission			(Line 52 * 53)	#DIV/0!
Network Credits					
55	Outstanding Network Credits		(Note N)	From PJM	0
56	Less Accumulated Depreciation Associated with Facilities with Outstanding Network Credits		(Note N)	From PJM	0
57	Net Outstanding Credits			(Line 55 - 56)	0
58	TOTAL Adjustment to Rate Base			(Line 43 + 44 + 44a + 44b + 46 + 51 + 54 - 57)	#DIV/0!
59	Rate Base			(Line 39 + 58)	#DIV/0!

O&M					
Transmission O&M					

60	Transmission O&M		p320-323.112.b	0
61	Less extraordinary property losses		Attachment 5	0
62	Plus amortization of extraordinary property losses		Attachment 5	0
63	Less Account 565		p320-323.96.b	0
64	Plus Schedule 12 payments billed to Transmission Owner and booked to Account 565	(Note O)	PJM Data	0
65	Plus Transmission Lease Payments	(Note A)	P200-201.4.c	0
66	<b>Transmission O&amp;M</b>		(Lines 60 - 61 + 62 - 63 + 64 + 65)	0
<b>Allocated General &amp; Common Expenses</b>				
67	Common Plant O&M	(Note A)	p356	0
68	Total A&G		p320-323.197.b	0
68a	For informational purposes: PBOP expense in FERC Account 926	(Note S)	(Attachment 5)	0
69	Less Property Insurance Account 924		p320-323.185.b	0
70	Less Regulatory Commission Exp Account 928	(Note E)	p320-323.189.b	0
71	Less General Advertising Exp Account 930.1		p320-323.191.b	0
72	Less EPRI Dues	(Note D)	p352-353	0
73	<b>General &amp; Common Expenses</b>		(Lines 67 + 68) - Sum (69 to 72)	0
74	Wage & Salary Allocation Factor		(Line 5)	#DIV/0!
75	<b>General &amp; Common Expenses Allocated to Transmission</b>		(Line 73 * 74)	#DIV/0!
<b>Directly Assigned A&amp;G</b>				
76	Regulatory Commission Exp Account 928	(Note G)	p320-323.189.b	0
77	General Advertising Exp Account 930.1	(Note K)	p320-323.191.b	0
78	Subtotal - Transmission Related		(Line 76 + 77)	0
79	Property Insurance Account 924		p320-323.185.b	0
80	General Advertising Exp Account 930.1	(Note F)	p320-323.191.b	0
81	Total		(Line 79 + 80)	0
82	Gross Plant Allocation Factor		(Line 16)	#DIV/0!
83	<b>A&amp;G Directly Assigned to Transmission</b>		(Line 81 * 82)	#DIV/0!
84	<b>Total Transmission O&amp;M</b>		<b>(Line 66 + 75 + 78 + 83)</b>	<b>#DIV/0!</b>

<b>Depreciation &amp; Amortization Expense</b>				
<b>Depreciation Expense</b>				
85	Transmission Depreciation Expense		Attachment 5	0
85a	Transmission Amortization Expense	(Note R)	Attachment 9	#DIV/0!
86	General Depreciation		Attachment 5	0
87	Intangible Amortization	(Note A)	Attachment 5	0
88	Total		(Line 86 + 87)	0
89	Wage & Salary Allocation Factor		Line 5	#DIV/0!
90	<b>General Depreciation Allocated to Transmission</b>		(Line 88 * 89)	#DIV/0!
91	Common Depreciation - Electric Only	(Note A)	Attachment 5	0
92	Common Amortization - Electric Only	(Note A)	Attachment 5	0
93	Total		(Line 91 + 92)	0
94	Wage & Salary Allocation Factor		(Line 5)	#DIV/0!
95	<b>Common Depreciation - Electric Only Allocated to Transmission</b>		(Line 93 * 94)	#DIV/0!
96	<b>Total Transmission Depreciation &amp; Amortization</b>		<b>(Line 85 + 85a + 90 + 95)</b>	<b>#DIV/0!</b>

<b>Taxes Other than Income</b>				
--------------------------------	--	--	--	--

97	Taxes Other than Income		Attachment 2	#DIV/0!
98	Total Taxes Other than Income		(Line 97)	#DIV/0!
Return / Capitalization Calculations				
Long Term Interest				
99	Long Term Interest		p114-117.62.c through 67.c	0
100	Less LTD Interest on Securitization Bonds	(Note P)	Attachment 8	0
101	Long Term Interest		(Line 99 - 100)	0
102	Preferred Dividends	enter positive	p118-119.29.c	--
Common Stock				
103	Proprietary Capital		p112-113.16.c	0
104	Less Preferred Stock	enter negative	(Line 113)	0
105	Less Account 216.1	enter negative	p112-113.12.c	0
105a	Less Account 219	enter negative	p112-113.15.c	0
106	Common Stock	(Note Y)	(Sum Lines 103 to 105a)	0
Capitalization				
107	Long Term Debt		p112-113.18.d through 21.d	0
108	Less Loss on Reacquired Debt	enter negative	p110-111.81.c	0
109	Plus Gain on Reacquired Debt	enter positive	p112-113.61.c	0
110	Less ADIT associated with Gain or Loss	enter negative	Attachment 1B – ADIT EOY, Line 7	0
111	Less LTD on Securitization Bonds	(Note P)	Attachment 8	0
112	Total Long Term Debt	(Note Z)	(Sum Lines 107 to 111)	0
113	Preferred Stock	(Note AA)	p112-113.3.c	0
114	Common Stock		(Line 106)	0
115	Total Capitalization		(Sum Lines 112 to 114)	0
116	Debt %	Total Long Term Debt	(Line 112 / 115)	0%
117	Preferred %	Preferred Stock	(Line 113 / 115)	0%
118	Common %	Common Stock	(Line 114 / 115)	0%
119	Debt Cost	Total Long Term Debt	(Line 101 / 112)	0.0000
120	Preferred Cost	Preferred Stock	(Line 102 / 113)	0.0000
121	Common Cost	Common Stock	(Note J) Fixed	0.1050
122	Weighted Cost of Debt	Total Long Term Debt (WCLTD)	(Line 116 * 119)	0.0000
123	Weighted Cost of Preferred	Preferred Stock	(Line 117 * 120)	0.0000
124	Weighted Cost of Common	Common Stock	(Line 118 * 121)	0.0000
125	Total Return ( R )		(Sum Lines 122 to 124)	0.0000
126	Investment Return = Rate Base * Rate of Return		(Line 59 * 125)	#DIV/0!

Composite Income Taxes					
Income Tax Rates					
127	FIT=Federal Income Tax Rate		(Note I)		0.00%
128	SIT=State Income Tax Rate or Composite		(Note I)		0.00%
129	p	(percent of federal income tax deductible for state purposes)		Per State Tax Code	0.00%
130	T	$T=1 - \{[(1 - SIT) * (1 - FIT)] / (1 - SIT * FIT * p)\} =$			0.00%
131	T/ (1-T)				0.00%
132	Tax Gross-Up Factor	1/(1-T)			
Investment Tax Credit Adjustment					
133	Investment Tax Credit Amortization		(Note T)	enter negative	Attachment 1B – ADIT EOY
134	Tax Gross-Up Factor [1/(1-T)]				(Line 132)
135	ITC Adjustment Allocated to Transmission				[Line 133 *134]
Other Income Tax Adjustment					
136a	Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense		(Note V)	Attachment 5, Line 136a	
136b	Amortization Deficient / (Excess) Deferred Taxes (Federal) - Transmission Component		(Note V)	Attachment 5, Line 136b	
136c	Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component		(Note V)	Attachment 5, Line 136c	
136d	Amortization of Other Flow-Through Items - Transmission Component		(Note V)	Attachment 5, Line 136d	
136e	Other Income Tax Adjustments - Expense / (Benefit)			(Line 136a + 136b + 136c + 136d)	
136f	Tax Gross-Up Factor [1/(1-T)]			(Line 132)	
136g	Other Income Tax Adjustment			(Line 136e*136f)	
136h	Income Tax Component =	$CIT=(T/1-T) * Investment\ Return * (1-(WCLTD/R)) =$		[Line 131 * 126 * (1-(122 / 125))]	#DIV/0!
137	Total Income Taxes			(Line 135 + 136g + 136h)	#DIV/0!
REVENUE REQUIREMENT					
Summary					
138	Net Property, Plant & Equipment			(Line 39)	#DIV/0!
139	Adjustment to Rate Base			(Line 58)	#DIV/0!
140	Rate Base			(Line 59)	#DIV/0!
141	O&M			(Line 84)	#DIV/0!
142	Depreciation & Amortization			(Line 96)	#DIV/0!
143	Taxes Other than Income			(Line 98)	#DIV/0!
144	Investment Return			(Line 126)	#DIV/0!
145	Income Taxes			(Line 137)	#DIV/0!
146	Gross Revenue Requirement			(Sum Lines 141 to 145)	#DIV/0!
Adjustment to Remove Revenue Requirements Associated with Excluded Transmission Facilities					
147	Transmission Plant In Service			(Line 19)	0
148	Excluded Transmission Facilities		(Note M)	Attachment 5	0
149	Included Transmission Facilities			(Line 147 - 148)	0
150	Inclusion Ratio			(Line 149 / 147)	#DIV/0!

151	Gross Revenue Requirement		(Line 146)	#DIV/0!
152	Adjusted Gross Revenue Requirement		(Line 150 * 151)	#DIV/0!
Revenue Credits & Interest on Network Credits				
153	Revenue Credits		Attachment 3	-
154	Interest on Network Credits	(Note N)	PJM Data	-
155	Net Revenue Requirement		(Line 152 - 153 + 154)	#DIV/0!
Net Plant Carrying Charge				
156	Net Revenue Requirement		(Line 155)	#DIV/0!
157	Net Transmission Plant and Abandoned Plant		(Line 19 – 30 + 44a)	-
158	Net Plant Carrying Charge		(Line 156 / 157)	#DIV/0!
159	Net Plant Carrying Charge without Depreciation		(Line 156 - 85) / 157	#DIV/0!
160	Net Plant Carrying Charge without Depreciation, Return, nor Income Taxes		(Line 156 - 85 - 126 - 137) / 157	#DIV/0!
Net Plant Carrying Charge Calculation per 100 basis point increase in ROE				
161	Net Revenue Requirement Less Return and Taxes		(Line 155 - 144 - 145)	#DIV/0!
162	Return and Taxes per 100 basis point increase in ROE		Attachment 4	#DIV/0!
163	Net Revenue Requirement per 100 basis point increase in ROE		(Line 161 + 162)	#DIV/0!
164	Net Transmission Plant and Abandoned Plant		(Line 157)	-
165	Net Plant Carrying Charge per 100 basis point increase in ROE		(Line 163 / 164)	#DIV/0!
166	Net Plant Carrying Charge per 100 basis point increase in ROE without Depreciation		(Line 162 - 85) / 164	#DIV/0!
167	Net Revenue Requirement		(Line 155)	#DIV/0!
168	True-up amount		Attachment 6	-
169	Plus any increased ROE calculated on Attachment 7 other than PJM Sch. 12 projects		Attachment 7	-
170	Facility Credits under Section 30.9 of the PJM OATT paid by Utility		Attachment 5	-
171	Net Zonal Revenue Requirement		(Line 167 + 168 + 169+ 170)	#DIV/0!
Network Zonal Service Rate				0
172	1 CP Peak	(Note L)	PJM Data	
173	Rate (\$/MW-Year)	(Note Q)	(Line 171 / 172)	#DIV/0!
174	Network Service Rate (\$/MW/Year)		(Line 173)	#DIV/0!

Notes	
A	Electric portion only
B	Exclude Construction Work In Progress and leases that are expensed as O&M (rather than amortized). New Transmission plant included which is expected to be placed in service in the current calendar year weighted by number of months it is expected to be in-service. For the true-up, new transmission plant which was actually placed in service weighted by the number of months it was actually in service
C	Transmission Portion Only
D	All EPRI Annual Membership Dues
E	All Regulatory Commission Expenses
F	Safety related advertising included in Account 930.1
G	Regulatory Commission Expenses directly related to transmission service, RTO filings, or transmission siting itemized in Form 1 at 351.h.
I	The currently effective income tax rate, where FIT is the Federal income tax rate; SIT is the State income tax rate, and p = "the percentage of federal income tax deductible for state income taxes". If the utility includes taxes in more than one state, it must explain in Attachment 5 the name of each state and how the blended or composite SIT was developed.
J	Per FERC's order in Docket No. ER07-576, the Conastone and Waugh Chapel substation projects get an additional 100 basis points to the return on equity on top of a base ROE of 10.0% per FERC order issued in Docket No. EL13-48 and a 50 basis point RTO transmission planning participation adder approved in Baltimore Gas and Electric Co., Docket No. ER07-576, by order issued on July 24, 2007, for a total ROE of 11.5%. The rest of transmission rate base, except as provided in Note Q below, gets an ROE of 10.5% because it excludes the additional 100 basis points approved solely for the Conastone and Waugh Chapel substation projects.
K	Education and outreach expenses relating to transmission, for example siting or billing
L	As provided for in Section 34.1 of the PJM OATT and the PJM established billing determinants will not be revised or updated in the annual rate reconciliations per settlement in ER05-515.
M	Amount of transmission plant excluded from rates, includes investment in generation step-up transformers to the extent included in Plant in Service.
N	Outstanding Network Credits is the balance of Network Facilities Upgrades Credits due Transmission Customers who have made lump-sum payments (net of accumulated depreciation) towards the construction of Network Transmission Facilities consistent with Paragraph 657 of Order 2003-A.  Interest on the Network Credits as booked each year is added to the revenue requirement to make the Transmission Owner whole on Line 154.
O	Payments made under Schedule 12 of the PJM OATT that are not directly assessed to load in the zone under Schedule 12 are included in Transmission O&M. If they are booked to account 565, they are included in on line 64.
P	Securitization bonds may be included in the capital structure per settlement in ER05-515.
Q	On November 16, 2007, the Federal Energy Regulatory Commission (FERC) granted Baltimore Gas and Electric (BGE) in Docket No. ER07-576 incentive rate treatment for 6 projects designated in the PJM Regional Transmission Expansion Plan (RTEP) as Transmission Owner Initiated (TOI). Specifically, FERC granted an additional 100 basis points to the return on equity (ROE) for these projects, resulting in a final ROE, for these projects, of 11.5%, inclusive of a base ROE of 10.0% per FERC order issued in Docket No. EL13-48 and a 50 basis point ROE transmission planning adder approved in Baltimore Gas and Electric Co., Docket No. ER07-576, by order issued on July 24, 2007.
R	Costs of Unamortized Abandoned Plant and Amortization of Abandoned Plant for Dedicated Facilities pre-approved for inclusion in this cell subject to Formula Rate Protocols by Commission order issued in PJM Interconnection, LLC and Baltimore Gas and Electric Co., 150 FERC ¶ 61,054 (2015). Costs of Unamortized Abandoned Plant and Amortization of Abandoned Plant for Mid-Atlantic Power Pathway (MAPP) approved for inclusion in this cell subject to Formula Rate Protocols by Commission order issued in PJM Interconnection, L.L.C. and Baltimore Gas and Electric Co., 152 FERC ¶ 61,254 (2015). Costs of Unamortized Abandoned Plant and Amortization of Abandoned Plant for Project Baseline Upgrades b1254 and b1254.1 ("b1254") approved for inclusion in this cell subject to Formula Rate Protocols by Commission order issued in PJM Interconnection, L.L.C. and Baltimore Gas and Electric Co., XXX FERC ¶XX1,XXX (XXXX).
S	See Attachment 5, Cost Support, section entitled "PBOP expense in FERC Account 926 " for additional information per FERC orders in Docket Nos. EL13-48, EL15-27, and ER16-456.
T	Baltimore Gas and Electric Company elected to amortize investment tax credits against recoverable income tax expense, rather than to reduce rate base by unamortized investment tax credit. Amortization reduces income tax expense and reduces the revenue requirement by the amount of the Investment Tax Credit Amortization multiplied by (1/1-T).
U	Only the transmission portion of amounts reported at Form 1, page 227, line 5 is used. The transmission portion of line 5 is specified in a footnote to the Form 1, page 227.
V	See Attachment 5 - Cost Support, section entitled "Other Income Tax Adjustment" for additional information.
W	The Accumulated Deferred Income Tax (ADIT) balances in Accounts 190, 281, 282, and 283 are measured using the enacted tax rate that is expected to apply when the underlying temporary differences are expected to be settled or realized. To preserve rate base neutrality, these balances appropriately exclude ADIT amounts associated with income tax related regulatory assets and liabilities. The balances in Accounts 190, 281, 282 and 283 are adjusted in accordance with Treasury regulation Section 1.167(l)-1(h)(6) and averaged in accordance with IRC Section 168(i)(9)(B) in the calculations of rate base in the projected revenue requirement and in the true-up adjustment. Differences attributable to over-projection of ADIT in the projected revenue requirement will result in a proportionate reversal of the projected prorated ADIT activity in the true-up adjustment to the extent of the over-projection. Differences attributable to under-projection of ADIT in the projected revenue requirement will result in an adjustment to the projected prorated ADIT activity by 50 percent of the difference between the projected monthly activity and the actual monthly activity. However, when projected monthly ADIT activity is an increase and actual monthly ADIT activity is a decrease, 50 percent of the actual monthly ADIT activity will be used. Likewise, when projected monthly ADIT activity is a decrease and actual monthly ADIT activity is an increase, 50 percent of actual monthly ADIT activity will be used. For the Annual Update (Projected) filing, see Attachment 1A - ADIT Summary, Column H for inputs. For the Annual Update (True-Up) filing, See Attachment 1A - ADIT Summary, Column M for inputs.
X	These balances represent the unamortized federal and state deficient / (excess) deferred income taxes. To preserve rate base neutrality and consistent with the exclusion of ADIT amounts associated with income tax-related regulatory assets and liabilities as described in Note W, regulatory assets and liabilities for deficient and excess ADIT are reflected without tax gross-up. For the Annual Update (Projected) filing, see Attachment 1D - ADIT Rate Base Adjustment, Column C for inputs. For the Annual Update (True-Up) filing, See Attachment 1D - ADIT Rate Base Adjustment, Column F for inputs.
Y	Common Stock balance will reflect the 13 month average of the balances, of which the 1st and 13th are found on page 112 lines 16.c & d in the Form No. 1. The balances for January through November shall represent the actual balances in BGE's books and records (trial balance or monthly balance sheet).
Z	Long Term Debt balance will reflect the 13 month average of the balances, of which the 1st and 13th are found on page 112 lines 18.c & d to 21.c & d in the Form No. 1. The balances for January through November shall represent the actual balances in BGE's books and records (trial balance or monthly balance sheet).
AA	Preferred Stock balance will reflect the 13 month average of the balances, of which the 1st and 13th are found on page 112 line 3.c & d in the Form No. 1. The balances for January through November shall represent the actual balances in BGE's books and records (trial balance or monthly balance sheet).
AB	<u>Effective October 1, 2025, Construction Work in Progress ("CWIP") is included in rate base for the 2022 Regional Transmission Expansion Plan Window 3 project ("Window 3 Project") only, as authorized in FERC Docket No. ER25-XXXX-XXX.</u>
ZZ	The revisions made in the Order No. 864 Cleanup Filing will not require any adjustment to rates or annual update filings for rates charged and annual updates filings made prior to the date of the order accepting the revised tariff sheets.

Baltimore Gas and Electric  
Accumulated Deferred Income Taxes (ADIT) - Transmission Allocated  
Attachment 1A - ADIT Summary

Rate Year  
=

Accumulated Deferred Income  
Taxes (Account No. 190)

Line	Days in Period					Projection - Proration of Deferred Tax Activity (Note A)			Actual - Proration of Deferred Tax Activity (Note B)				
	(A)  Month	(B)  Days Per Month	(C)  Remaining Days Per Month	(D)  Total Days in Future Test Period	(E)  Proration Amount (Column C / Column D)	(F)  Projected Monthly Activity	(G)  Prorated Projected Monthly Activity (Column E x Column F)	(H)  Prorated Projected Balance (Col. G Plus Col. H, Preceding Balance)	(I)  Actual Monthly Activity	(J)  Difference Projected vs. Actual (Note C)	(K)  Preserve Proration (Actual vs Projected) (Note D)	(L)  Preserve Proration (Actual vs Projected) (Note E)	(M)  Preserved Prorated Actual Balance (Col. K + Col. L + Col. M, Preceding Balance)
1	ADIT Subject to Proration					[Insert Date]		-	[Insert Date]				-
2	Projected / Actual Activity					[Insert Date]			[Insert Date]				
3	January				50.00%	-	-	-	-	-	-	-	-
4	February				50.00%	-	-	-	-	-	-	-	-
5	March				50.00%	-	-	-	-	-	-	-	-
6	April				50.00%	-	-	-	-	-	-	-	-
7	May				50.00%	-	-	-	-	-	-	-	-
8	June				50.00%	-	-	-	-	-	-	-	-
9	July				50.00%	-	-	-	-	-	-	-	-
10	August				50.00%	-	-	-	-	-	-	-	-
11	September				50.00%	-	-	-	-	-	-	-	-
12	October				50.00%	-	-	-	-	-	-	-	-
13	November				50.00%	-	-	-	-	-	-	-	-
14	December				50.00%	-	-	-	-	-	-	-	-

15	Total (Sum of Lines 3 - 14)	-	-	-	-	-	-	-	-				
16	Beginning Balance - ADIT Not Subject to Proration	[Insert Date]	-	[Insert Date]	-								
17	Beginning Balance - ADIT Adjustment	(Note F)	-		-								
18	Beginning Balance - DTA / (DTL)	(Col. (H), Line 16 + Line 17)	-	(Col. (M), Line 16 + Line 17)	-								
19	Ending Balance - ADIT Not Subject to Proration	[Insert Date]	#DIV/0!	[Insert Date]	-								
20	Ending Balance - ADIT Adjustment	(Note F)	-		-								
21	Ending Balance - DTA / (DTL)	(Col. (H), Line 19 + Line 20)	#DIV/0!	(Col. (M), Line 19 + Line 20)	-								
22	Average Balance as adjusted (non-prorated)	([Col. (H), Line 18 + Line 21] /2)	#DIV/0!	([Col. (M), Line 18 + Line 21] /2)	-								
23	Prorated ADIT	(Col. (H), Line 14 )	-	(Col. (M), Line 14 )	-								
24	Amount for Attachment H-2A, Line 40a	(Col. (H), Line 22 + Line 23)	#DIV/0!	(Col. (M), Line 22 + Line 23)	-								
Accumulated Deferred Income Taxes - Accelerated Amortization (Account No. 281)													
Line	Days in Period				Projection - Proration of Deferred Tax Activity (Note A)			Actual - Proration of Deferred Tax Activity (Note B)					
	(A)  Month	(B)  Days Per Month	(C)  Prorated Days Per Month	(D)  Total Days Per Future Test Period	(E)  Proration Amount (Column C / Column D)	(F)  Projected Monthly Activity	(G)  Prorated Projected Monthly Activity (Column E x Column F)	(H)  Prorated Projected Balance (Col. G Plus Col. H, Preceding Balance)	(I)  Actual Monthly Activity	(J)  Difference Projected vs. Actual (Note C)	(K)  Preserve Proration (Actual vs Projected) (Note D)	(L)  Preserve Proration (Actual vs Projected) (Note E)	(M)  Preserved Prorated Actual Balance (Col. K + Col. L + Col. M, Preceding Balance)
25	ADIT Subject to Proration	[Insert Date]	-	[Insert Date]	-				[Insert Date]				-
26	Projected /	[Insert		[Insert					[Insert				

	Actual Activity		Date]			Date]				
27	January		50.00%		-	-	-	-	-	-
28	February		50.00%		-	-	-	-	-	-
29	March		50.00%		-	-	-	-	-	-
30	April		50.00%		-	-	-	-	-	-
31	May		50.00%		-	-	-	-	-	-
32	June		50.00%		-	-	-	-	-	-
33	July		50.00%		-	-	-	-	-	-
34	August		50.00%		-	-	-	-	-	-
35	September		50.00%		-	-	-	-	-	-
36	October		50.00%		-	-	-	-	-	-
37	November		50.00%		-	-	-	-	-	-
38	December		50.00%		-	-	-	-	-	-
39	Total (Sum of Lines 27 - 38)	-		-	-	-	-	-	-	-
40	Beginning Balance - ADIT Not Subject to Proration		[Insert Date]		-		[Insert Date]			-
41	Beginning Balance - ADIT Adjustment		(Note F)		-					-
42	Beginning Balance - DTA / (DTL)		(Col. (H), Line 40 + Line 41)		-		(Col. (M), Line 40 + Line 41)			-
43	Estimated Ending Balance - ADIT Not Subject to Proration		[Insert Date]		-		[Insert Date]			-
44	Ending Balance - ADIT		(Note F)		-					-
45	Adjustment Ending Balance - DTA / (DTL)		(Col. (H), Line 43 + Line 44)		-		(Col. (M), Line 43 + Line 44)			-
46	Average Balance as adjusted (non- prorated)		([Col. (H), Line 42 + Line 45] /2)		-		([Col. (M), Line 42 + Line 45] /2)			-
47	Prorated ADIT		(Col. (H), Line 38 )		-		(Col. (M),			-

				Line 38 )	
48	Amount for Attachment H-2A, Line 40b	(Col. (H), Line 46 + Line 47)	-	(Col. (M), Line 46 + Line 47)	-

Accumulated Deferred Income  
Taxes - Property (Account No.  
282)

Line	Days in Period					Projection - Proration of Deferred Tax Activity (Note A)			Actual - Proration of Deferred Tax Activity (Note B)				
	(A)  Month	(B)  Days Per Month	(C)  Prorated Days Per Month	(D)  Total Days Per Future Test Period	(E)  Proration Amount (Column C / Column D)	(F)  Projected Monthly Activity	(G)  Prorated Projected Monthly Activity (Column E x Column F)	(H)  Prorated Projected Balance (Col. G Plus Col. H, Preceding Balance)	(I)  Actual Monthly Activity	(J)  Difference Projected vs. Actual (Note C)	(K)  Preserve Proration (Actual vs Projected) (Note D)	(L)  Preserve Proration (Actual vs Projected) (Note E)	(M)  Preserved Prorated Actual Balance (Col. K + Col. L + Col. M, Preceding Balance)
49	ADIT Subject to Proration					[Insert Date]		-	[Insert Date]				-
50	Projected / Actual Activity					[Insert Date]			[Insert Date]				
51	January				50.00%		-	-	-	-	-	-	-
52	February				50.00%		-	-	-	-	-	-	-
53	March				50.00%		-	-	-	-	-	-	-
54	April				50.00%		-	-	-	-	-	-	-
55	May				50.00%		-	-	-	-	-	-	-
56	June				50.00%		-	-	-	-	-	-	-
57	July				50.00%		-	-	-	-	-	-	-
58	August				50.00%		-	-	-	-	-	-	-
59	September				50.00%		-	-	-	-	-	-	-
60	October				50.00%		-	-	-	-	-	-	-
61	November				50.00%		-	-	-	-	-	-	-
62	December				50.00%		-	-	-	-	-	-	-
63	Total (Sum of Lines 51 -	-				-	-	-	-	-	-	-	

62)

64	Beginning Balance - ADIT Not Subject to Proration	[Insert Date]	-	[Insert Date]	-
65	Beginning Balance - ADIT Depreciation Adjustment	(Note F)	-		-
66	Beginning Balance - DTA / (DTL)	(Col. (H), Line 64 + Line 65)	-	(Col. (M), Line 64 + Line 65)	-
67	Estimated Ending Balance - ADIT Not Subject to Proration	[Insert Date]	#DIV/0!	[Insert Date]	-
68	Ending Balance - ADIT Depreciation Adjustment	(Note F)	-		-
69	Ending Balance - DTA / (DTL)	(Col. (H), Line 67 + Line 68)	#DIV/0!	(Col. (M), Line 67 + Line 68)	-
70	Average Balance as adjusted (non-prorated)	([Col. (H), Line 66 + Line 69] /2)	#DIV/0!	([Col. (M), Line 66 + Line 69] /2)	-
71	Prorated ADIT	(Col. (H), Line 62 )	-	(Col. (M), Line 62 )	-
72	Amount for Attachment H-2A, Line 40c	(Col. (H), Line 70 + Line 71)	#DIV/0!	(Col. (M), Line 70 + Line 71)	-

Accumulated Deferred Income Taxes - Other (Account No. 283)

Line	Days in Period					Projection - Proration of Deferred Tax Activity (Note A)			Actual - Proration of Deferred Tax Activity (Note B)				
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
	Month	Days Per Month	Prorated Days Per Month	Total Days Per Future Test Period	Proration Amount (Column C / Column D)	Projected Monthly Activity	Prorated Projected Monthly Activity (Column E x Column F)	Prorated Projected Balance (Col. G Plus Col. H, Preceding Balance)	Actual Monthly Activity	Difference Projected vs. Actual (Note C)	Preserve Proration (Actual vs Projected) (Note D)	Preserve Proration (Actual vs Projected) (Note E)	Preserved Prorated Actual Balance (Col. K + Col. L + Col. M, Preceding Balance)

73	ADIT Subject to Proration	[Insert Date]	-	[Insert Date]	-
74	Projected / Actual Activity	[Insert Date]		[Insert Date]	

75	January		50.00%	-	-	-	-	-	-	-
76	February		50.00%	-	-	-	-	-	-	-
77	March		50.00%	-	-	-	-	-	-	-
78	April		50.00%	-	-	-	-	-	-	-
79	May		50.00%	-	-	-	-	-	-	-
80	June		50.00%	-	-	-	-	-	-	-
81	July		50.00%	-	-	-	-	-	-	-
82	August		50.00%	-	-	-	-	-	-	-
83	September		50.00%	-	-	-	-	-	-	-
84	October		50.00%	-	-	-	-	-	-	-
85	November		50.00%	-	-	-	-	-	-	-
86	December		50.00%	-	-	-	-	-	-	-
87	Total (Sum of Lines 75 - 86)			-	-	-	-	-	-	-
88	Beginning Balance - ADIT Not Subject to Proration			[Insert Date]	-	[Insert Date]	-			
89	Beginning Balance - ADIT Adjustment			(Note F)	-		-			
90	Beginning Balance - DTA / (DTL)			(Col. (H), Line 88 + Line 89)	-	(Col. (M), Line 88 + Line 89)	-			
91	Estimated Ending Balance - ADIT Not Subject to Proration			[Insert Date]	#DIV/0!	[Insert Date]	-			
92	Ending Balance - ADIT Adjustment			(Note F)	-		-			
93	Ending Balance - DTA / (DTL)			(Col. (H), Line 91 + Line 92)	#DIV/0!	(Col. (M), Line 91 + Line 92)	-			
94	Average Balance as adjusted (non-prorated)			([Col. (H), Line 90 + Line 93] /2)	#DIV/0!	([Col. (M), Line 90 + Line 93] /2)	-			
95	Prorated ADIT			(Col. (H), Line 86 )	-	(Col. (M), Line 86 )	-			
96	Amount for			(Col. (H), Line 94 +	#DIV/0!	(Col. (M), Line 94 +				

Attachment H-2A,  
Line 40d

Line 95)

Line 95)

-

Accumulated Deferred  
Investment Tax Credits (Account  
No. 255)

Line	Days in Period					Projection - Proration of Deferred ITC Activity (Note A)			Actual - Proration of Deferred ITC Activity (Note B)				
	(A)  Month	(B)  Days Per Month	(C)  Prorated Days Per Month	(D)  Total Days Per Future Test Period	(E)  Proration Amount (Column C / Column D)	(F)  Projected Monthly Activity	(G)  Prorated Projected Monthly Activity (Column E x Column F)	(H)  Prorated Projected Balance (Col. G Plus Col. H, Preceding Balance)	(I)  Actual Monthly Activity	(J)  Difference Projected vs. Actual (Note C)	(K)  Preserve Proration (Actual vs Projected) (Note D)	(L)  Preserve Proration (Actual vs Projected) (Note E)	(M)  Preserved Prorated Actual Balance (Col. K + Col. L + Col. M, Preceding Balance)
97	DITC Subject to Proration					[Insert Date]		-	[Insert Date]				-
98	Projected / Actual Activity					[Insert Date]			[Insert Date]				
99	January				50.00%	-	-	-	-	-	-	-	-
100	February				50.00%	-	-	-	-	-	-	-	-
101	March				50.00%	-	-	-	-	-	-	-	-
102	April				50.00%	-	-	-	-	-	-	-	-
103	May				50.00%	-	-	-	-	-	-	-	-
104	June				50.00%	-	-	-	-	-	-	-	-
105	July				50.00%	-	-	-	-	-	-	-	-
106	August				50.00%	-	-	-	-	-	-	-	-
107	September				50.00%	-	-	-	-	-	-	-	-
108	October				50.00%	-	-	-	-	-	-	-	-
109	November				50.00%	-	-	-	-	-	-	-	-
110	December				50.00%	-	-	-	-	-	-	-	-
111	Total (Sum of Lines 99 - 110)	-				-	-		-	-	-	-	

112	Beginning Balance - DITC Not Subject to Proration	[Insert Date]	-	[Insert Date]	-
113	Beginning Balance - DITC Adjustment	(Note F)	-		-
114	Beginning Balance - DITC	(Col. (H), Line 112 + Line 113)	-	(Col. (M), Line 112 + Line 113)	-
115	Estimated Ending Balance - DITC Not Subject to Proration	[Insert Date]	-	[Insert Date]	-
116	Ending Balance - DITC Adjustment	(Note F)	-		-
117	Ending Balance - DITC	(Col. (H), Line 115 + Line 116)	-	(Col. (M), Line 115 + Line 116)	-
118	Average Balance as adjusted (non-prorated)	[(Col. (H), Line 114 + Line 117) /2)	-	[(Col. (M), Line 114 + Line 117) /2)	-
119	Prorated DITC	(Col. (H), Line 110 )	-	(Col. (M), Line 110 )	-
120	<b>Amount for Attachment H-2A, Line 40e</b>	(Col. (H), Line 118 + Line 119)	-	(Col. (M), Line 118 + Line 119)	-

Instructions

1. For purposes of calculating transmission allocated projected activity, use Columns (F), (G), and (H) and set the "Rate Year" below to "Projected Activity". For purposes of calculating the "True-Up" adjustment, use Columns (I), (J), (K), (L), and (M) and set the "Rate Year" below to "True-Up Adjustment".

Rate Year

Projected Activity

Check

2. For the Annual Update (Projected) filing, see Attachment 1A - ADIT Summary, Column H for inputs. For the Annual Update (True-Up) filing, See Attachment 1A - ADIT Summary, Column M for inputs.

Notes

- A
- The computations on this worksheet apply the proration rules of Reg. Sec. 1.167(l)-1(h)(6) to the annual activity of accumulated deferred income taxes subject to the normalization requirements . Activity related to the portions of the account balances not subject to the proration requirement are averaged instead of prorated. For accumulated deferred income taxes subject to the normalization requirements, activity for months prior to the future portion of the test period is averaged rather than prorated. This section is used to prorate the projected ADIT balance.
- B
- The balances in Accounts 190, 281, 282 and 283 are adjusted in accordance with Treasury regulation Section 1.167(l)-1(h)(6) and averaged in accordance with IRC Section 168(i)(9)(B) in the calculations of rate base in the projected revenue requirement and in the true-up adjustment. Differences attributable to over-projection of ADIT in the projected revenue requirement will result

in a proportionate reversal of the projected prorated ADIT activity in the true-up adjustment to the extent of the over-projection. Differences attributable to under-projection of ADIT in the projected revenue requirement will result in an adjustment to the projected prorated ADIT activity by 50 percent of the difference between the projected monthly activity and the actual monthly activity. However, when projected monthly ADIT activity is an increase and actual monthly ADIT activity is a decrease, 50 percent of the actual monthly ADIT activity will be used. Likewise, when projected monthly ADIT activity is a decrease and actual monthly ADIT activity is an increase, 50 percent of actual monthly ADIT activity will be used. This section is used to calculate ADIT activity in the true-up adjustment only.

- C

Column J is the difference between projected monthly and actual monthly activity (Column I minus Column F). Specifically, if projected and actual activity are both positive, a negative in Column J represents over-projection (amount of projected activity that did not occur) and a positive in Column J represents under-projection (excess of actual activity over projected activity). If projected and actual activity are both negative, a negative in Column J represents under-projection (excess of actual activity over projected activity) and a positive in Column J represents over-projection (amount of projected activity that did not occur).
- D

Column K preserves proration when actual monthly and projected monthly activity are either both increases or decreases. Specifically, if Column J is over-projected, enter Column G x [Column I/Column F]. If Column J is under-projected, enter the amount from Column G and complete Column L). In other situations, enter zero.
- E

Column L applies when (1) Column J is under-projected AND (2) actual monthly and projected monthly activity are either both increases or decreases. Enter the amount from Column J. In other situations, enter zero.
- F

This section is reserved for adjustments necessary to comply with the IRS normalization rules.

**Baltimore Gas and Electric**  
**Accumulated Deferred Income Taxes (ADIT)**  
**Attachment 1B - ADIT Worksheet - End of Year**

Line	ADIT (Not Subject to Proration)	Gas, Production, Distribution, or Only Transmission Plant Labor				
		Total	Other Related	Related	Related	Related
1	ADIT-190	#DIV/0!	-	-	#DIV/0!	#DIV/0!
2	ADIT-281	-	-	-	-	-
3	ADIT-282	#DIV/0!	-	-	#DIV/0!	#DIV/0!
4	ADIT-283	#DIV/0!	-	-	#DIV/0!	#DIV/0!
5	ADITC-255	#DIV/0!	-	-	#DIV/0!	#DIV/0!
6	Subtotal - Transmission ADIT	#DIV/0!	-	-	#DIV/0!	#DIV/0!

Line	Description	Total
7	ADIT (Reacquired Debt)	

Note: ADIT associated with Gain or Loss on Reacquired Debt included in ADIT-283, Column B is excluded from rate base and instead included in Cost of Debt on Attachment H-2A, Line 110. A deferred tax (liability) should be reported as a positive balance and a deferred tax asset should be reported as a negative balance on Attachment H-2A, Line 110. The ADIT balance is based on the 13-month average.

In filling out this attachment, a full and complete description of each item and justification for the allocation to Columns B - F and each separate ADIT item will be listed, dissimilar items with amounts exceeding \$100,000 will be listed separately.

(A)	(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADIT-190 (Not Subject to Proration)	Total					



Subtotal: ADIT-190 (Subject to Proration)		-	-	-	-	-	
Less: ASC 740 ADIT Adjustments excluded from rate base							
Less: ASC 740 ADIT Adjustments related to unamortized ITC							
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-190 (Subject to Proration)		-	-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
ADIT - Transmission		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)	(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADIT-190	Total					
ADIT-190 (Not Subject to Proration)	-	-	-	-	-	
ADIT-190 (Subject to Proration)	-	-	-	-	-	
Total - FERC Form 1, Page 234	-	-	-	-	-	

Instructions for Account 190:  
1. ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C  
2. ADIT items related only to Transmission are directly assigned to Column D

3. ADIT items related to Plant and not in Columns C & D are included in Column E
4. ADIT items related to labor and not in Columns C & D are included in Column F
5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded.
6. ADIT items subject to the proration under the "normalization" rules will be included in ADIT-190 (Subject to Proration)

(A)		(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G)
ADIT- 282 (Not Subject to Proration)		Total					Justification
Subtotal: ADIT-282 (Not Subject to Proration)		-	-	-	-	-	
Less: ASC 740 ADIT Adjustments excluded from rate base							
Less: ASC 740 ADIT Adjustments related to AFUDC Equity							
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-282 (Not Subject to Proration)		-	-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
ADIT - Transmission		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)		(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADIT-282 (Subject to Proration)		Total					
Subtotal: ADIT-282 (Subject to Proration)		-	-	-	-	-	
Less: ASC 740 ADIT Adjustments excluded from rate base							
Less: ASC 740 ADIT Adjustments related to unamortized ITC							
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-282 (Subject to Proration)		-	-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
ADIT - Transmission		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)		(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADIT-282		Total					
ADIT-282 (Not Subject to Proration)		-	-	-	-	-	
ADIT-282 (Subject to Proration)		-	-	-	-	-	
Total - FERC Form 1, Page 274-275		-	-	-	-	-	

**1. ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C**

**3. ADIT items related to Plant and not in Columns C & D are included in Column E**

5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded.

[illegible]

Subtotal: ADIT-283 (Not Subject to Proration)		-	-	-	-	-	
Less: ASC 740 ADIT Adjustments excluded from rate base							
Less: ASC 740 ADIT Adjustments related to unamortized ITC							
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-283 (Not Subject to Proration)		-	-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
ADIT - Transmission		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)	(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADIT- 283 (Subject to Proration)	Total					
Subtotal: ADIT-283 (Subject to Proration)	-	-	-	-	-	
Less: ASC 740 ADIT Adjustments excluded from rate base						
Less: ASC 740 ADIT Adjustments related to unamortized ITC						

Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-283 (Subject to Proration)			-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
ADIT - Transmission			#DIV/0!	-	-	#DIV/0!	#DIV/0!

(A)	(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADIT-283	Total					
ADIT-283 (Not Subject to Proration)		-	-	-	-	
ADIT-283 (Subject to Proration)		-	-	-	-	
Total - FERC Form 1, Page 276-277		-	-	-	-	

Instructions for Account 283:

- 1. ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C
- 2. ADIT items related only to Transmission are directly assigned to Column D
- 3. ADIT items related to Plant and not in Columns C & D are included in Column E
- 4. ADIT items related to labor and not in Columns C & D are included in Column F
- 5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded
- 6. ADIT items subject to the proration under the "normalization" rules will be included in ADIT-283 (Subject to Proration)

(A)		(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
ADITC-255 (Unamortized Investment Tax Credits)		Total					
Total - FERC Form 1, Page 266-267		-	-	-	-	-	
Total: ADIT-255		-	-	-	-	-	
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
Unamortized Investment Tax Credit - Transmission		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

(A)		(B)	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification
Investment Tax Credit Amortization		Total					
		-					

Total - FERC Form 1, Page 266-267			-	-	-	-	-
Total: Investment Tax Credit Adjustments							
Wages & Salary Allocator						#DIV/0!	
Gross Plant Allocator					#DIV/0!		
Transmission Allocator				100.00%			
Other Allocator			0.00%				
Investment Tax Credit Amortization - Transmission		#DIV/0!	-	-	#DIV/0!	#DIV/0!	

END

## ATTACHMENT F

Baltimore Gas and Electric Company  
Accumulated Deferred Income Taxes Remeasurement  
Attachment 1F - Deficient / Excess Deferred Income Taxes Worksheet

Tax Cuts and Jobs Act of 2017

				ADIT - Pre Rate Change (December 31, 2017)					ADIT - Post Rate Change (December 31, 2017)					Deficient / (Excess) Deferred Income Taxes (December 31, 2017)									
Line	Detailed Description	Description	Category	Federal Gross Timing Difference	Federal ADIT @ 35%	State ADIT	FIT on SIT	Total ADIT	Federal Gross Timing Difference	Federal ADIT @ 21%	State ADIT	FIT on SIT	Total ADIT	Rate Change Deferred Tax Impact	Non-Recovable	Income Tax Regulatory Asset / Liability Deferred Taxes	Deficient / (Excess) ADIT Balance	Jurisdiction Allocator	Electric Transmission	Allocator (Note B)	Transmission Allocated	FERC Account	
	(A)	(B)	(C)	(D)	(E) = (D) * 35%	(F)	(G) = (F) * 35%	(H) = (E) + (F) + (G)	(I)	(J) = (I) * 21%	(K)	(L) = (K) * 21%	(M) = (J) + (K) + (L)	(N) = (H) - (M)	(O)	(P)	(Q) = (N) - (O) - (P)	(R)	(S)	(T)	(U) = (Q) * (T)	(V)	
FERC Account 190 (Note A)																							
1	Accrued Bonus	Accrued Bonus	Unprotected Non-Property	\$ -			\$ -	\$ -	\$ -			\$ -	\$ -	\$ -		\$ -	\$ -	100% Distribution	No	0.00%	\$ -	190	
2	Accrued Benefits	BCBS Claim Adjustment	Unprotected Non-Property	-			-	-	-			-	-	-		-	-	100% Distribution	No	0.00%	-	190	
3	Allowance for Doubtful Accounts	Allowance for Doubtful Accounts	Unprotected Non-Property	-			-	-	-			-	-	-		-	-	100% Distribution	No	0.00%	-	190	
4	Charitable Contributions	Charitable Contributions	Unprotected Non-	-			-	-	-			-	-	-		-	-	100% Distr	No	0.00%	-	190	

			Property														Contribution			
5	Charitable Contribution Fed C/F	Charitable Contributions	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.00%	190
6	Deferred ITC	Deferred ITC	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.00%	190
7	Deferred ITC	Deferred ITC	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.00%	190
8	OPEB	Post Retirement Benefits	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	-	-	-	100% Distribution	Yes	0.00%	190
9	Allowance for Excess Material	Miscellaneous	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	-	-	-	A&G Ratio	Yes	11.985%	190
10	Gas Inventory	Gas Inventory Overheads	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	-	-	-	100% Distribution	Yes	0.00%	190
11	Gas Demand	Gas Demand	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.00%	190
12	GCRC	GCRC	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.00%	190
13	Environmental Reserves	Miscellaneous	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.00%	190

14	Purchase of Receivables	Miscellaneous	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
15	Long Term Incentives	Miscellaneous	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
16	Other (190)	Miscellaneous	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
17	Workers Compensation Accruals	Workers Compensation Reserve	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
18	Vacation Pay Accruals	Vacation Pay	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
19	Pension	Pension	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	A&G Ratio	Yes	11.985%	-	190
20	Reg Liab - AMI	Reg Liab	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
21	State NOL	Net Operating Losses (Federal and State)	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	A&G Ratio	Yes	11.985%	-	190
22	ITC Federal Carryforward FAS 109	Deferred ITC	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
23	NonTCJA	Deferred ITC	Unprot	-	-	-	-	-	-	-	-	-	-	N/A	No	0.000%	-	190

			ected Non- Propert y																0 %		
			Unprot ected Non- Propert y																0. 00 0 %		19 0
24	FAS109 TCJA	Reg Liab	y	-	-	-	-	-	-	-	-	-	-	-	-	-	N/A	No		-	
25	<b>Total FERC Account 190</b>			\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$			\$		
				-	-	-	-	-	-	-	-	-	-	-	-	-			-		

**FERC Account  
282 (Note A)**

26	Fixed Asset Basis Differences (PowerTax) - Protected	Plant Related Deferred Taxes	Protect ed Propert y	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	Plan t	Yes	15 .2 16 %	\$	28 2
27	Fixed Asset Basis Differences (PowerTax) - Non-Protected	Plant Related Deferred Taxes	Unprot ected Propert y	-	-	-	-	-	-	-	-	-	-	-	-	-	Plan t	Yes	15 .2 16 %	-	28 2
28	FAS109 TCJA	Plant Related Deferred Taxes	Unprot ected Propert y	-	-	-	-	-	-	-	-	-	-	-	-	-	Plan t	No	0. 00 0 %	-	28 2
29	FAS 109 NonTCJA	Plant Related Deferred Taxes	Unprot ected Propert y	-	-	-	-	-	-	-	-	-	-	-	-	-	Plan t	No	0. 00 0 %	-	28 2
30	ARO	ARO	Unprot ected Propert y	-	-	-	-	-	-	-	-	-	-	-	-	-	Plan t	No	0. 00 0 %	-	28 2
31	Fixed Asset Basis Differences (Non-PowerTax) - Non-Protected	Plant Related Deferred Taxes	Unprot ected Propert y	-	-	-	-	-	-	-	-	-	-	-	-	-	100 % Elect ric	No	0. 00 0 %	-	28 2
32	Fixed Asset Basis Differences (Non-PowerTax) - Non-Protected	Plant Related Deferred Taxes	Unprot ected Propert y	-	-	-	-	-	-	-	-	-	-	-	-	-	100 % Elect ric	No	0. 00 0 %	-	28 2
33	<b>Total FERC Account 282</b>			\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$			\$		
				-	-	-	-	-	-	-	-	-	-	-	-	-			-		

FERC Account  
283 (Note A)

34	AMI Regulatory Asset	AMI Reg Asset	Unprot ected Non-Propert y	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	100 % Distr ibuti on	No	0. 00 0 %	\$ -	28 3
35	Deferred Fuel	Deferred Fuel	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	-	N/A	No	0. 00 0 %	\$ -	28 3
36	DRI Program	DRI Program	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	-	100 % Distr ibuti on	No	0. 00 0 %	\$ -	28 3
37	Energy Efficiency Programs	Energy Efficiency Program	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	-	100 % Distr ibuti on	No	0. 00 0 %	\$ -	28 3
38	Loss on Reacquired Debt	Loss on Reacquired Debt	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	-	A&G Rati o	Yes	10 0. 00 0 %	\$ -	28 3
39	POLR	POLR	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	-	N/A	No	0. 00 0 %	\$ -	28 3
40	Property Tax Payable	Property Tax Payable	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	-		Yes	10 0. 00 0 %	\$ -	28 3
41	Regulatory Asset - Legacy Meters	Legacy Meters	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	-	N/A	No	0. 00 0 %	\$ -	28 3
42	Regulatory Asset - ARO	Reg Asset - ARO	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	-	N/A	No	0. 00 0 %	\$ -	28 3

43	Regulatory Asset - Electric Trans Rt True Up	Reg Asset Elec Trans Rt True Up	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	N/A	No	0.000%	\$-	283
44	Regulatory Asset-Spring Gardens	Environme ntal Clean Up Costs Prv	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100% Distr ibuti on	No	0.000%	\$-	283
45	ERI	ERI Overrecov ery	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100% Distr ibuti on	No	0.000%	\$-	283
46	RIF Reg Asset	RIF Reg Asset Amort	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100% Distr ibuti on	No	0.000%	\$-	283
47	Rate Case Reg Asset	Reg Asset - Rate Case	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100% Distr ibuti on	No	0.000%	\$-	283
48	Reg Asset - Cost to Achieve	Reg Asset - Cost to Achieve	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100% Distr ibuti on	No	0.000%	\$-	283
49	Reg Liab - Smart Energy Rewards	Reg Asset - Smart Energy Rewards	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100% Distr ibuti on	No	0.000%	\$-	283
50	Reg Liab - Stride	STRIDE Overrecov ery	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	N/A	No	0.000%	\$-	283
51	Severance Prepaid	Severance Cost - Reg Asset	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100% Distr ibuti on	No	0.000%	\$-	283
52	Software &	Prepaid IT	Unprot	-	-	-	-	-	-	-	-	-	-	-	A&G	Yes	100.0%	\$-	283

	License Expenses	ected Non-Property	-	-	-	-	-	-	-	-	-	-	-	Ratio	00%				
53	DRI Adjustment	DRI Program	-	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.00%	\$-	283	
54	Other (283)	Deferred Compensation	-	-	-	-	-	-	-	-	-	-	-	N/A	No	0.00%	\$-	283	
55	Total FERC Account 283		\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-				\$-		
56	Grand Total		\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-	\$-				\$-		

## Instructions

income tax balance sheet accounts (Accounts 190, 281, 282 and 283) based on the nature of the temporary difference and the related classification requirements of the accounts. If as a result of action or expected action by a regulator, it is probable that the effect of a future increase or decrease in taxes payable resulting from a change in tax law or rates will be recovered from or passed through to customers through future rates, a regulatory asset or liability is recognized in Account 182.3 (Other Regulatory Assets), or Account 254 (Other Regulatory Liabilities), as appropriate, for that probable future revenue or reduction in future revenue. The amortization of deficient and excess deferred income taxes that will be recovered from or passed through to customers through future rates will be recorded in FERC Accounts 410.1 (Provision for Deferred Income Taxes, Utility Operating Income) and 411.1 (Provision for Deferred Income Taxes—Credit, Utility Operating Income), as appropriate. Re-measurements of deferred tax balance sheet accounts may also result in re-measurements of tax-related regulatory assets or liabilities that had been recorded prior to the change in tax law. If it is not probable that the effect of a future increase or decrease in taxes payable resulting from a change in tax law or rates will be recovered from or passed through to customers through future rates, tax expense will be recognized in Account 410.2 (Provision for Deferred Income Taxes, Other Income or Deductions) or tax benefit is recognized in Account 411.2 (Provision for Deferred Income Taxes-Credit, Other Income or Deductions), as appropriate.

2. For deficient and (excess) accumulated deferred income taxes (ADIT) related to change(s) to income tax rates occurring after September 30, 2018, insert calculations that support the re-measurement amount delineated by category (i.e., protected property, unprotected property, and unprotected non-property).

3. Set the allocation percentages equal to the applicable percentages at the date of the rate change.

**Notes**

- A Categorization of items as protected or non-protected will remain as originally agreed, absent a change in guidance from the Internal Revenue Service (IRS) with respect to that items. Balances associated with the tax rate change will not be adjusted (except for amortization each year) absent audit adjustments, tax return amendments, or a change in IRS guidance. Any resulting changes will be prominently disclosed including the basis for the change.
- B The allocation percentage in Column T are based on the applicable percentages at the date of the rate change and must remain fixed absent the Commission's express approval.

**END**

Attachment 2 - Taxes Other Than Income Worksheet

Other Taxes		Page 262-263 Col (I)	Allocator	Allocated Amount
<b>Plant Related</b>			Gross Plant Allocator	
1	Real property (State, Municipal or Local)			
2	Personal property			
3	Capital Stock Tax			
4	Gross Premium (insurance) Tax			
5	PURTA			
6	Corp License			
<b>Total Plant Related</b>		-	#DIV/0!	#DIV/0!
<b>Labor Related</b>			Wages & Salary Allocator	
7	Federal FICA			
8	Unemployment			
<b>Total Labor Related</b>		-	#DIV/0!	#DIV/0!
<b>Other Included</b>			Gross Plant Allocator	
9	Miscellaneous			
10	Use & Sales Tax			
<b>Total Other Included</b>		-	#DIV/0!	#DIV/0!
<b>Total Included</b>				#DIV/0!
<b>Currently Excluded</b>				
11	Federal Income			
12	Maryland Income			
13	Pennsylvania Income			
14	Franchise			
15	PSC Assessment			
16	Environmental Surcharge			
17	Pole License			
18	Fuel Energy			
19	Montgomery County Fuel Energy			
20	Universal Service Fund			

21	Total	-
22	Total "Taxes Other Than Income Taxes" – Page 114-117 line 14.g plus line 15.g plus line 16.g	
23	Difference	-

Criteria for Allocation:

- A Other taxes that are incurred through ownership of plant including transmission plant will be allocated based on the Gross Plant Allocator. If the taxes are 100% recovered at retail they may not be included
- B Other taxes that are incurred through ownership of only general or intangible plant will be allocated based on the Wages and Salary Allocator. If the taxes are 100% recovered at retail they may not be included
- C Other taxes that are assessed based on labor, will be allocated based on the Wages and Salary Allocator
- D Other taxes except as provided for in A, B and C above, that are incurred and (1) are not fully recovered at retail or (2) are directly or indirectly related to transmission service will be allocated based on the Gross Plant Allocator; provided, however, that overheads shall be treated as in footnote B above

Baltimore Gas and Electric Company  
Attachment 3 - Revenue Credit Workpaper

		Total Amount	Allocation Factor	Allocation %	Total Amount Included in Rates
<b>Account 454 - Rent from Electric Property</b>					
1	Rent from Electric Property - Transmission Related (Note 3)				
2	Total Rent Revenues	(Sum Line 1)	Transmission	100%	-
<b>Account 456 - Other Electric Revenues (Note 1)</b>					
3	Schedule 1A		Transmission	100%	
4	Net revenues associated with Network Integration Transmission Service (NITS) for which the load is not included in the divisor (difference between NITS credits from PJM and PJM NITS charges paid by Transmission Owner) (Note 4)		Transmission	100%	-
5	Point to Point Service revenues for which the load is not included in the divisor received by transmission owner		Transmission	100%	
6	PJM Transitional Revenue Neutrality (Note 1)		Transmission	100%	-
7	PJM Transitional Market Expansion (Note 1)		Transmission	100%	-
8a	Professional Services (Note 3, Transmission Related)		Transmission	100%	-
8b	Professional Services (Note 3, Labor Related)		Wages and Salaries		
9	Revenues from Directly Assigned Transmission Facility Charges (Note 2)		Transmission	100%	-
10	Rent or Attachment Fees associated with Transmission Facilities (Note 3)		Transmission	100%	-
11	Gross Revenue Credits	(Sum Lines 2-10)	Transmission	100%	-
12	Less line 17g				-
13	Total Revenue Credits				-
<b><u>Revenue Adjustment to determine Revenue Credit</u></b>					
14	Note 1: All revenues related to transmission that are received as a transmission owner (i.e., not received as a LSE), for which the cost of the service is recovered under this formula, except as specifically provided for elsewhere in this Attachment or elsewhere in the formula will be included as a revenue credit or included in the peak on line 172 of Appendix A.				
15	Note 2: If the costs associated with the Directly Assigned Transmission Facility Charges are included in the Rates, the associated revenues are included in the Rates. If the costs associated with the Directly Assigned Transmission Facility Charges are not included in the Rates, the associated revenues are not included in the Rates.				
16	Note 3: Ratemaking treatment for the following specified secondary uses of transmission assets: (1) right-of-way leases and leases for space on transmission facilities for telecommunications; (2) transmission tower licenses for wireless antennas; (3) right-of-way property leases for farming, grazing or nurseries; (4) licenses of intellectual property (including a portable oil degasification process and scheduling software); and (5) transmission maintenance and consulting services (including energized circuit maintenance, high-voltage substation maintenance, safety training, transformer oil testing, and circuit breaker testing) to other utilities and large customers (collectively, products). Company will retain 50% of net revenues consistent with Pacific Gas and Electric Company, 90 FERC ¶ 61,314. Note: in order to utilize lines 17a - 17g, the utility must track in separate subaccounts the revenues and costs associated with each secondary use (except for the cost of the associated income taxes).				
17a	As discussed in Note 3 above, revenues included in lines 1-11 which are subject to 50/50 sharing.	-			
17b	Costs associated with revenues in line 17a				
17c	Net Revenues (17a - 17b)	-			

17d	50% Share of Net Revenues (17c/2)	-
17e	Costs associated with revenues in line 17a that are included in FERC accounts recovered through the formula times the allocator used to functionalize the amounts in the FERC account to the transmission service at issue.	
17f	Net Revenue Credit (17d + 17e)	-
17g	Line 17f less line 17a	-
18	Note 4: If the facilities associated with the revenues are not included in the formula, the revenue is shown here, but not included in the total above and is explained in the Cost Support; for example, revenues associated with distribution facilities. In addition, revenues from Schedule 12 are not included in the total above to the extent they are credited under Schedule 12.	
19	Amount offset in line 4 above	
20	Total Account 454 and 456	-
	FN1 #	-
	Difference	-

Baltimore Gas and Electric Company  
Attachment 4 - Calculation of 100 Basis Point Increase in ROE

A	Return and Taxes with 100 Basis Point increase in ROE				
	100 Basis Point increase in ROE and Income Taxes		(Line 126 + Line 137)		#DIV/0!
B	100 Basis Point increase in ROE			1.00%	
Return Calculation					
59	Rate Base		(Line 39 + 58)		#DIV/0!
Long Term Interest					
99	Long Term Interest		p114-117.62.c through 67.c		0
	Less LTD Interest on Securitization Bonds				
100		Note P on Appendix A	Attachment 8		
101	Long Term Interest		(Line 99 - 100)		0
102	Preferred Dividends	enter positive	p118-119.29.c		0
Common Stock					
103	Proprietary Capital		p112-113.16.c		0
104	Less Preferred Stock	enter negative	(Line 113)		0
105	Less Account 216.1	enter negative	p112-113.12.c		0
105a	Less Account 219	enter negative	P112-113.15.c		0
106	Common Stock	(Note Y)	(Sum Lines 103 to 105a)		0
Capitalization					
107	Long Term Debt		p112-113.18.d through 21.d		0
108	Less Loss on Reacquired Debt	enter negative	p110-111.81.c		0
109	Plus Gain on Reacquired Debt	enter positive	p112-113.61.c		0
110	Less ADIT associated with Gain or Loss	enter negative	Attachment 1		0
111	Less LTD on Securitization Bonds	enter negative	Attachment 8		0
112	Total Long Term Debt	(Note Z)	(Sum Lines 107 to 111)		0
113	Preferred Stock	(Note AA)	p112-113.3.c		0
114	Common Stock		(Line 106)		0
115	Total Capitalization		(Sum Lines 112 to 114)		0
116	Debt %	Total Long Term Debt	(Line 112 / 115)		0%
117	Preferred %	Preferred Stock	(Line 113 / 115)		0%
118	Common %	Common Stock	(Line 114 / 115)		0%
119	Debt Cost	Total Long Term Debt	(Line 101 / 112)		0.0000
120	Preferred Cost	Preferred Stock	(Line 102 / 113)		0.0000
121	Common Cost	See (Note J) on Appendix A	Common Stock	Appendix A % plus 100 Basis Pts	0.1150
122	Weighted Cost of Debt	Total Long Term Debt (WCLTD)	(Line 116 * 119)		0.0000
123	Weighted Cost of Preferred	Preferred Stock	(Line 117 * 120)		0.0000
124	Weighted Cost of Common	Common Stock	(Line 118 * 121)		0.0000
125	Total Return ( R )		(Sum Lines 122 to 124)		0.0000
126	Investment Return = Rate Base * Rate of Return		(Line 59 * 125)		#DIV/0!

Composite Income Taxes (Note L)					
Income Tax Rates					
127	FIT=Federal Income Tax Rate		(Note I from ATT H-2A)		0.00%
128	SIT=State Income Tax Rate or Composite		(Note I from ATT H-2A)		0.00%
129	p	P = (percent of federal income tax deductible for state purposes)		Per State Tax Code	0.00%
130	T	T=1 - {[(1 - SIT) * (1 - FIT)] / (1 - SIT * FIT * p)} =			0.00%
131	T/ (1-T)				0.00%
132	Tax Gross-Up Factor	1/(1-T)			

	<b>Investment Tax Credit Adjustment</b>	(Note T from ATT H-2A)		
133	Investment Tax Credit Amortization	enter negative	Attachment 1B – ADIT EOY	0
134	Tax Gross-Up Factor [1/(1-T)]		(Line 132)	0.00%
135	<b>ITC Adjustment Allocated to Transmission</b>		[Line 133 *134]	#DIV/0!
	<b>Other Income Tax Adjustment</b>			
136a	Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense	(Note V from ATT H-2A)	Attachment 5, Line 136a	0
136b	Amortization Deficient / (Excess) Deferred Taxes (Federal) - Transmission Component	(Note V from ATT H-2A)	Attachment 5, Line 136b	
136c	Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component	(Note V from ATT H-2A)	Attachment 5, Line 136c	
136d	Amortization of Other Flow-Through Items - Transmission Component	(Note V from ATT H-2A)	Attachment 5, Line 136d	
136e	Other Income Tax Adjustments - Expense / (Benefit)		Line 136a + 136b + 136c + 136d	
136f	Tax Gross-Up Factor [1/(1-T)]		Line 132	
136g	Other Income Tax Adjustment		Line 136e*136f	
136h	<b>Income Tax Component =</b>	$CIT=(T/1-T) * \text{Investment Return} * (1-(WCLTD/R)) =$	[Line 131 * 126 * (1-(122 / 125))]	#DIV/0!
137	<b>Total Income Taxes</b>		(Line 135 + 136g + 136h)	#DIV/0!

Baltimore Gas and Electric Company  
Attachment 5 - Cost Support

Electric / Non-electric Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Electric Portion	Non-electric Portion	Details
<b>Allocated General &amp; Common Expenses</b>							
65	Plus Transmission Lease Payments	(Note A)	P200-201.4.c				
67	Common Plant O&M	(Note A)	p356				
<b>Depreciation Expense</b>							
85	Transmission Depreciation		p336.7.b / Projected				
86	General Depreciation		p336.10.b / Projected				
87	Intangible Amortization	(Note A)	p336.1.d / Projected			0	Amount in Form 1 is already electric only.
91	Common Depreciation - Electric Only	(Note A)	p336.11.b / Projected			0	Amount in Form 1 is already electric only.
92	Common Amortization - Electric Only	(Note A)	p336.11.d / Projected			0	Amount in Form 1 is already electric only.

Transmission / Non-transmission Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Transmission Related	Non-transmission Related	Details
28	Plant Held for Future Use (Including Land)	(Note C)	p214 (See Attachment 9, line 30, column c)				Specific identification based on plant records 1 2 3 4 5

CWIP & Expensed Lease Worksheet

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	CWIP In Form 1 Amount	Expensed Lease in Form 1 Amount	Details
6	<b>Plant Allocation Factors</b> Electric Plant in Service	0	p204-207.104.g		0	0	See Form 1
19	<b>Plant In Service</b> Transmission Plant In Service	0	p204-207.58.g		0	0	See Form 1
24	Common Plant (Electric Only)	(Notes A)	p356		0	0	Electric / non-electric cost support above
30	<b>Accumulated Depreciation</b> Transmission Accumulated Depreciation	0	p219.25.c		0	0	See Form 1

EPRI Dues Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	EPRI Dues	Details
<b>Allocated General &amp; Common Expenses</b>						
72	Less EPRI Dues	(Note D)	p352-353			EPRI Dues paid by Holding company (Constellation Energy)

Total Electric Administrative & General Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Non-Recoverable Costs (including Merger Costs)	Recoverable Costs	Details
68	<b>Allocated General &amp; Common Expenses</b> Total A&G	0	p320-323.197.b		0.00	0.00	See Form 1

Regulatory Expense Related to Transmission Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Transmission Related	Non-transmission Related	Details
Allocated General & Common Expenses							
70	Less Regulatory Commission Exp Account 928	(Note E)	p320-323.189.b				
Directly Assigned A&G							
76	Regulatory Commission Exp Account 928	(Note G)	p320-323.189.b		0	0	Included amount associated with proceedings before FERC.

Safety Related Advertising Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Safety Related	Non-safety Related	Details
Directly Assigned A&G							
80	General Advertising Exp Account 930.1	(Note F)	p320-323.191.b			-	Electric advertising cost in account 930.1 associated with safety

MultiState Workpaper

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				State 1	State 2	State 3	State 4	State 5	Details
Income Tax Rates									
128	SIT=State Income Tax Rate or Composite	(Note I)	0	Maryland	Enter State Enter %	Enter State Enter %	Enter State Enter %	Enter State Enter %	Enter Calculation Maryland Only

Education and Out Reach Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Education & Outreach	Other	Details
Directly Assigned A&G							
77	General Advertising Exp Account 930.1	(Note K)	p320-323.191.b	-	0	0	

Excluded Plant Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Excluded Transmission Facilities	Description of the Facilities
Adjustment to Remove Revenue Requirements Associated with Excluded Transmission Facilities						
148	Excluded Transmission Facilities	(Note M)	Attachment 5		0	General Description of the Facilities
	Instructions:				Enter \$	None
1	Remove all investment below 69 kV or generator step up transformers included in transmission plant in service that are not a result of the RTEP Process					
2	If unable to determine the investment below 69kV in a substation with investment of 69 kV and higher as well as below 69 kV, the following formula will be used:				Or	
					Enter \$	
A	Total investment in substation		1,000,000			
B	Identifiable investment in Transmission (provide workpapers)		500,000			
C	Identifiable investment in Distribution (provide workpapers)		400,000			
D	Amount to be excluded (A x (C / (B + C)))		444,444			
Example						
						Add more lines if necessary

Outstanding Network Credits Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Outstanding Network Credits	Description of the Credits
Network Credits						
55	Outstanding Network Credits	(Note N)	From PJM		0	General Description of the Credits
					Enter \$	None

56	Less Accumulated Depreciation Associated with Facilities with Outstanding Network Credits	(Note N)	From PJM	0	
				Enter \$	None
					Add more lines if necessary

Unfunded Reserves

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions

44

Total Reserves Account Balance Attributable to Transmission

Long-Term (defined as being due more than 1 year from each month-end balance sheet date) Portions recorded in FERC Accounts (242, 232, 253, 228.1, 228.2, 228.3, & 228.4) and the long-term accrued portions of below items that have not yet been transferred to trusts, escrow accounts or restricted accounts, but are still in general accounts as of month-end and therefore available to Company.

13-Month Average  
Total Reserves

FERC Account 228.1

FERC Account 228.2

FERC Account 228.3

FERC Account 228.4

FERC Account 232

FERC Account 242

FERC Account 253

Total Reserves 13-Month Average Account Balance Attributable to Transmission

Attachment H-2A Line 44

Note: The Formula Rate shall include a credit to rate base for all long-term unfunded reserves (funds collected from customers that (1) have not been set aside in a trust, escrow or restricted account; (2) whose balance is collected from customers through cost accruals to accounts that are recovered under the Formula Rate; and (3) exclude the portion of any balance offset by a balance sheet account). The unfunded reserve allocators will utilize the same allocators used in the formula for the cost accruals to the account that is recovered under the Formula Rate. Since reserves can be created by an offsetting balance sheet account, rather than through cost accruals, the amount to be deducted from rate base should exclude the portion offset by another balance sheet account. Additionally, balances where the related expense was recorded either below the line, 100% to a line of business other than wholesale transmission, or to an expense account not included in the formula rate should not be included in the account reserves deducted from rate base. The gas share of common expenses is also excluded from the above computation. See supporting worksheet that derives the 13-month average balances shown above.

## Prepayments

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions																Description of the Prepayments
<p><b>45 Prepayments</b> (limited to balance in account 165 except for prepaid pension)</p>	December Prior Year	January	February	March	April	May	June	July	August	September	October	November	End of Year December	Allocator	Allocation Factor (Gross Plant, Wage and Salary Ratio, or Excluded)	
<p>Detail of Prepayments Included</p> <p>p.110-111, I.57</p>																
<p>Prepaid Pensions if not included in Prepayments</p> <p>Total Monthly Balance Included in Rates</p>	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!		Wage and Salary Ratio	<p>Prepaid Pension is recorded in FERC account 186 (see FERC Form 1 page 233). Attachment 9, line 17-29, column f</p>

### Extraordinary Property Loss

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions			Amount	Number of years	Amortization	w/ interest
61	Less extraordinary property losses	Attachment 5				
62	Plus amortization of extraordinary property losses	Attachment 5			\$ -	\$ -

### Abandoned Plant Calculations

Baseline Upgrade b1254				
Description	Model Reference	Dedicated Facilities	MAPP	Baseline Upgrade b1254

<u>a</u>	-	Beginning Balance of Unamortized Transmission Projects	Per PJM Interconnection, L.L.C. and Baltimore Gas & Electric Co., 150 FERC ¶ 61,054 (2015) and PJM Interconnection, L.L.C., Baltimore Gas & Electric Co., 152 FERC ¶ 61,254 (2015) and PJM Interconnection, L.L.C. and Baltimore Gas & Electric Co., XXX FERC ¶ XX,XXX (XXXX)			
<u>b</u>	-	Years remaining in Amortization Period	Per PJM Interconnection, L.L.C. and Baltimore Gas & Electric Co., 150 FERC ¶ 61,054 (2015) and PJM Interconnection, L.L.C., Baltimore Gas & Electric Co., 152 FERC ¶ 61,254 (2015) and PJM Interconnection, L.L.C. and Baltimore Gas & Electric Co., XXX FERC ¶ XX,XXX (XXXX)			
<u>c</u>	-	Transmission Depreciation Expense Including Amortization of Limited Term Plant <sup>1</sup>	(line a / line b)	#DIV/0!	#DIV/0	#DIV/0
<u>d</u>	-	Ending Balance of Unamortized Transmission Projects	(line a - line c)	#DIV/0!	#DIV/0!	#DIV/0
<u>e</u>	-	Average Balance of Unamortized Abandoned Transmission Projects <sup>2</sup>	(line a + d)/2	#DIV/0!	#DIV/0!	#DIV/0
<u>f</u>	-	Non-Incentive Return and Income Taxes	(Appendix A line 144+ line 145)	#DIV/0!	#DIV/0!	#DIV/0
<u>g</u>	-	Rate Base	(Appendix A line 59)	#DIV/0!	#DIV/0!	#DIV/0
<u>h</u>	-	Non-Incentive Return and Income Taxes <sup>3</sup>	(line f / line g)	#DIV/0!	#DIV/0!	#DIV/0
1- See row 85a, Appendix A. See also amortization included in Attachment 7 revenue requirement calculation.				-		
2- See row 44a, Appendix A. See also investment included in Attachment 7 revenue requirement calculation.				-		
3- Carrying charge rate to be used when computing the revenue requirement for all abandonment plant facilities (see Attachment 7).						

Interest on Outstanding Network Credits Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Interest on Network Credits	Description of the Interest on the Credits
154	##	Interest on Network Credits	(Note N)	PJM Data	General Description of the Credits
				0	None
				Enter \$	
Add more lines if necessary					

Facility Credits under Section 30.9 of the PJM OATT paid by Utility

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Amount	Description & PJM Documentation
171	Net Revenue Requirement	Net Zonal Revenue Requirement		-	

PJM Load Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				1 CP Peak	Description & PJM Documentation
172	Network Zonal Service Rate	1 CP Peak	(Note L)	PJM Data	PJM Zonal Peak Load per 34.1 of the PJM OATT

Statements BG/BH (Present and Proposed Revenues)

Customer	Billing Determinants	Current Rate	Proposed Rate	Current Revenues	Proposed Revenues	Change in Revenues
BG&E Zone			#DIV/0!	-	#DIV/0!	#DIV/0!
				-		
Total				-	#DIV/0!	#DIV/0!

PBOP Expense in FERC 926

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions		Total A&G Form 1 Amount	Account 926 Form 1 Amount	PBOP in FERC 926 current rate year	PBOP in FERC 926 prior rate year	Explanation of change in PBOP in FERC 926
68	Total A&G	Total: p.320-323.197.b Account 926: p.320-323.187.b and c				

Other Income Tax Adjustments

Line	Component Descriptions	Instruction References	Transmission Depreciation Expense Amount	Tax Rate from Attachment H-2A, Line 130	Amount to Attachment H-2A, Line 136e
136a	Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense Amortization of Deficient / (Excess) Deferred Taxes - Transmission Component	Instr. 1, 2, 3 below	\$	X	\$
136b	Amortization Deficient / (Excess) Deficient Deferred Taxes (Federal) - Transmission Component	Instr. 4 below			
136c	Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component	Instr. 4 below			-
136d	Amortization of Other Flow-Through Items - Transmission Component	Instr. 5 below			
136e	Total Other Income Tax Adjustments - Expense / (Benefit)	Instr. 6 below			\$

<u>Instr. #s</u>	<u>Instructions</u>
Inst. 1	Transmission Depreciation Expense is the gross cumulative amount based upon tax records of capitalized AFUDC equity embedded in the gross plant attributable to the transmission function multiplied by the Capital Recovery Rate (described in Instruction 2).
Inst. 2	Capital Recovery Rate is the book depreciation rate applicable to the underlying plant assets.
Inst. 3	"AFUDC Equity" category reflects the nondeductible component of depreciation expense related to the capitalized equity portion of Allowance for Funds Used During Construction (AFUDC).
Inst. 4	Upon enactment of changes in tax law, accumulated deferred income taxes are re-measured and adjusted in the Company's books of account, resulting in deficient or (excess) accumulated deferred income taxes (ADIT). Such deficient or (excess) ADIT attributed to the transmission function will be based upon tax records and calculated in the calendar year in which the deficient or (excess) amount was measured and recorded for financial reporting purposes. See Attachment 1E - EDIT Amortization, Column G, Line 50 and Line 79 for additional information and support for the current year amortization. The current year amortization of deficient and (excess) ADIT is recorded in FERC Accounts 410.1 and 411.1.
Inst. 5	Other Flow-Through Items - In the past regulatory agencies required certain federal and state income tax savings resulting from temporary differences between the amount of taxes computed for ratemaking purposes and taxes on the amount of actual current federal income tax liability to be immediately "flowed through" rates for certain assets. The "flow-through" savings were accounted for in deferred tax balances, based on the expectation and understanding that while tax savings would be immediately flowed through to ratepayers, the flow-through expense incurred when the temporary differences reverse would be recovered from ratepayers. The "Amortization of Other Flow-Through Items" represents the transmission portion of tax expense relating to the reversal of these temporary differences. The Other Flow-Through balance as of September 30, 2018 will reverse beginning October 1, 2018 based on the prescribed period.
Inst. 6	Negative amounts (i.e. tax benefits) reduce recoverable tax expense and positive amounts (i.e. tax expense) increase recoverable tax expense.

Baltimore Gas and Electric Company  
Attachment 5a - Allocations of Costs to Affiliates

Summary of Administrative and General Expense (A&G) Charged to BGE by Exelon Business Services Company (BSC)

Expense Items	Amount Allocated to BG&E Electric	Amount Allocated to BG&E Gas
---------------	--	---------------------------------------

A&G

Explanation of the method



Baltimore Gas and Electric Company

Attachment 6 - Reconciliation Worksheet

Step

1 Calculation of Calendar Revenues for Trued-Up Year

Line #			[Insert Date] Update	[Insert Date] Update	
1	Rate (\$/MW-Year)	Line 173 of Applicable Update			
2	Daily Rate (\$/MW-Day)	Line 1 / number of days in the year	0.00	0.00	
3	Number of Days Effective in the calendar Year				
4	1 CP Peak	Line 172 of Applicable Update			
5	Total PJM Billed Revenues from applicable update	Lines 2 x 3 x 4	-	-	
6	True-Up from applicable update	Line 168 of Applicable Update	-	-	
7	Effective Number of Days in Calendar Year				
8	Total Number of Days in Calendar Year				
9	True-Up Included in PJM Billed Revenues Above	Lines 6 x 7 / 8	-	-	Total
10	Billed PJM Revenues, Excluding Impact of True-Up	Line 5 minus Line 9			-

2 Comparison of Trued-Up File to Calendar Revenues

Trued-Up Revenue Requirement per Line 167, 169 & 170 of Attachment H2-A

	Calendar Revenues Per Step 1 above	
-	-	= -

Interest on Amount of Refunds or Surcharges  
Interest 35.19a for March Current Yr

Month	Yr	1/12 of Step 2	Interest 35.19a for March Current Yr	Months	Interest	(Refund)/Charge
Jun	-		0.0000%	11.5	-	-
Jul	-		0.0000%	10.5	-	-
Aug	-		0.0000%	9.5	-	-

Sep	-	0.0000%	8.5	-	-
Oct	-	0.0000%	7.5	-	-
Nov	-	0.0000%	6.5	-	-
Dec	-	0.0000%	5.5	-	-
Jan	-	0.0000%	4.5	-	-
Feb	-	0.0000%	3.5	-	-
Mar	-	0.0000%	2.5	-	-
Apr	-	0.0000%	1.5	-	-
May	-	0.0000%	0.5	-	-
Total	-				-

	Balance	Interest	Amort	Balance
Jun	-	0.0000%	-	-
Jul	-	0.0000%	-	-
Aug	-	0.0000%	-	-
Sep	-	0.0000%	-	-
Oct	-	0.0000%	-	-
Nov	-	0.0000%	-	-
Dec	-	0.0000%	-	-
Jan	-	0.0000%	-	-
Feb	-	0.0000%	-	-
Mar	-	0.0000%	-	-
Apr	-	0.0000%	-	-
May	-	0.0000%	-	-
Total with interest			-	

The difference between the Trued-Up Revenue Requirement and the calendar billed revenues

(excl true-up) with interest -

Prior Period Adjustments - Note 1

Total true-up  
amount -

Rev Req based on Current Year data before True-Up + Incentive Revenues + 30.9 Credits #DIV/0! Note 2  
Total Revenue Requirement #DIV/0!

Note  
1

Prior Period Adjustment is the amount of an adjustment to correct an error in a prior period. The adjustment will include a gross-up for income tax purposes, as appropriate. The FERC Refund interest rate specified in CFR 35.19(a) for the period up to the date the projected rates that are subject to True-up here went into effect will be used in the calculation.

Note  
2

Please note that the "Rev Req based on Current Year data before True-Up + Incentive Revenues + 30.9 Credits" will be populated in the Projected Transmission Revenue Requirement (PTRR) but will not be populated in the Actual Transmission Revenue Requirement (ATRR).

Baltimore Gas and Electric Company  
Attachment 7 - Transmission Enhancement Charge Worksheet

New Plant Carrying Charge  
FCR if not a CIAC

Formula Line			
A	159	Net Plant Carrying Charge without Depreciation	
B	166	Net Plant Carrying Charge per 100 basis point increase in ROE without Depreciation	#DIV/0!
C		Line B less Line A	#DIV/0!
FCR if a CIAC			#DIV/0!

D	160	Net Plant Carrying Charge without Depreciation, Return, nor Income Taxes	#DIV/0!
---	-----	--	---------

The FCR resulting from Formula in a given year is used for that year only.

Therefore actual revenues collected in a year do not change based on cost data for subsequent years

Per FERC's orders in Docket No. ER07-576, the Conastone and Waugh Chapel substation projects, the Downtown Project, and the Northwest to Finksburg project get an ROE of 11.5%. The rest of transmission rate base gets an ROE of 10.5% which includes a 50 basis point RTO transmission planning participation adder approved in Baltimore Gas and Electric Co., Docket No. ER07-576, by order issued on July 24, 2007.

Details		Conastone 500kV Substation Project				Waugh Chapel 500 kV Substation Project				Downtown Project				Northwest to Finksburg							Dedicated Facility Project				Dedicated Facility Project – Abandonment Costs				MAPP Project – Abandonment Costs				Baseline Upgrade b1254 – Abandonment Costs			
Schedule 12	(Yes or No)	44				44				44				44 No 100 #DIV/0! #DIV/0! may be weighted average of small projects							10 No				No				No				No			
Life		No				No				No																										
CIAC	(Yes or No)																																			
ROE Incentive (Basis Points)		100				100				100																										
FCR W/O Incentive		#DIV/0!				#DIV/0!				#DIV/0!				#DIV/0!											0 see Att. 5, Abandoned Plant Carrying Charge				0 see Att. 5, Abandoned Plant Carrying Charge				0 see Att. 5, Abandoned Plant Carrying Charge			
FCR for This Project		#DIV/0!				#DIV/0!				#DIV/0!				#DIV/0!											0 see Att. 5, Abandoned Plant Carrying Charge				0 see Att. 5, Abandoned Plant Carrying Charge				0 see Att. 5, Abandoned Plant Carrying Charge			
Investment		- may be weighted average of small projects				- may be weighted average of small projects				- may be weighted average of small projects				- may be weighted average of small projects							- may be weighted average of small projects				-				-							
Annual Depreciation or Amort. Exp.		-				-				-				-							-				-				-							
In Service Month (1-12)		- may be weighted average of small projects				- may be weighted average of small projects				- may be weighted average of small projects				- may be weighted average of small projects																						
	Invest Yr	Beginning	Depr. or Amort.	Ending	Revenue	Beginning	Depr. or Amort.	Ending	Revenue	Beginning	Depr. or Amort.	Ending	Revenue	Beginning	Depr. or Amort.	Ending	Revenue	Total	Incentive Charged	Revenue Credit	Beginning	Depreciation	Ending	Revenue												
W/O Enhancement	2004																	#DIV/0 !		#DIV/0!																
W Enhancement	2004																	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2005																	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2005																	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2006																	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2006																	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2007																	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2007																	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2008					-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2008					-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2009	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2009	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2010	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2010	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2011	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2011	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2012	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2012	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2013	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2013	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2014	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2014	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2015	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2015	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2016	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2016	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2017	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2017	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2018	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2018	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2019	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W Enhancement	2019	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																
W/O Enhancement	2020	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!	#DIV/0!																

W Enhancement	2020	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			
W/O Enhancement	2021	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			
W Enhancement	2021	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			
W/O Enhancement	2022	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			
W Enhancement	2022	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			
W/O Enhancement	2023	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			
W Enhancement	2023	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			
W/O Enhancement	2024	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			
W Enhancement	2024	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			
W/O Enhancement	2025	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			
W Enhancement	2025	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0 !	#DIV/0!		-	-	-	-			

Lines shown above are illustrative only. The Dedicated Facility Project revenue requirement grid(s) shown above reflect the revenue requirements associated with a directly assigned transmission charge. The revenue requirement associated with this project in any given year is included on line 146 of Attachment H-2A ("the Gross Revenue Requirement") of BGE's formula rate model. This same revenue requirement is in turn credited on line 153 of Attachment H-2A ("Revenue Credits") such that this directly assigned transmission charge has no impact on Attachment H-2A, line 155 ("Net Revenue Requirement"). In this way BGE's wholesale transmission customers are insulated from any revenue requirement effect from the Dedicated Facility Project.

To accommodate varying in-service dates for different phases of these projects, it may be necessary to perform the above calculations by vintage.

The Dedicated Facility Project: Abandonment revenue requirement grid(s) shown above reflect the revenue requirements associated with the abandonment costs regulatory asset as it pertains to the directly assigned transmission charge. The revenue requirement associated with these abandonment costs in any given year is included on line 152 of Attachment H-2A (the Gross Revenue Requirement) of BGE's formula rate model. This same revenue requirement is in turn credited on line 159 of Attachment H-2A (Revenue Credits) such that abandonment costs related to this directly assigned transmission charge has no impact on Attachment H-2A, line 161 (Net Revenue Requirement). In this way BGE's wholesale transmission customers are insulated from any revenue requirement effect associated with abandonment costs related to the directly assigned facility charge, should such abandonment costs ever arise.

Revenue requirements associated with abandoned plant will be billed to the zones that would have borne cost responsibility if the underlying assets had been placed in service, in accordance with existing PJM cost assignment policies.

Baltimore Gas and Electric Company

Attachment 8 - Company Exhibit - Securitization Workpaper

Line #

100	Long Term Interest		
	Less LTD Interest on Securitization Bonds		0

111	Capitalization		
	Less LTD on Securitization Bonds		0

Calculation of the above Securitization  
Adjustments



Attachment 9

Rate Base  
Worksheet

Baltimore Gas  
and Electric

(Note G)		Gross Plant In Service			Accumulated Depreciation			Accumulated Amortization		Net Plant In Service		
Line No	Month	Transmission	General & Intangible	Common	Transmiss ion	General	Common	Intangible	Common	Transmission	General & Intangible	Common
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
	Attachment H-2A, Line No:	19	23	24	30	31	12	10	11			
		204-207.58.g minus 204- 207.57.g. Projected monthly balances that are the amounts expected to be included in 204- 207.58.g for end of year and records for other months (Note E)	204-207.99.g plus 204- 207.5g, minus 204-207.98.g for end of year, records for other months	Electric Only, Form No 1, page 356 for end of year, records for other months	Monthly balances that are expected to be included in 219.25.c for end of year and records for other months (Note E)	219.28.c for end of year, records for other months	Electric Only, Form No 1, page 356 for end of year, records for other months	200- 201.21.c for end of year, records for other months	Electric Only, Form No 1, page 356 for end of year, records for other months	Col. (b) - (e)	Col. (c) - Col. (f) - Col. (h)	Col. (d) - Col. (g) - Col. (i)
1	December Prior Year Actual	-	-	-	-	-	-	-	-	-	-	-
2	January	-	-	-	-	-	-	-	-	-	-	-
3	February	-	-	-	-	-	-	-	-	-	-	-

4	March	-	-	-	-	-	-	-	-	-	-	-
5	April	-	-	-	-	-	-	-	-	-	-	-
6	May	-	-	-	-	-	-	-	-	-	-	-
7	June	-	-	-	-	-	-	-	-	-	-	-
8	July	-	-	-	-	-	-	-	-	-	-	-
9	August	-	-	-	-	-	-	-	-	-	-	-
10	September	-	-	-	-	-	-	-	-	-	-	-
11	October	-	-	-	-	-	-	-	-	-	-	-
12	November	-	-	-	-	-	-	-	-	-	-	-
13	December	-	-	-	-	-	-	-	-	-	-	-
14	Average of the 13 Monthly Balances (Attachment 9A)	-	-	-	-	-	-	-	-	-	-	-
15	Less Merger Cost to Achieve (Attachment 10)		#DIV/0!	#DIV/0!		#DIV/0!	#DIV/0!	#DIV/0!	-		#DIV/0!	#DIV/0!
16	Average of the 13 Monthly Balances Less Merger Cost to Achieve	-	#DIV/0!	#DIV/0!	-	#DIV/0!	#DIV/0!	#DIV/0!	-	-	#DIV/0!	#DIV/0!

(Note G)

Line No	Month	CWIP	PHFU	Undistrib uted		Unamortize d Regulatory Asset	Unamortize d Abandoned Plant	Account No. 282	Account No. 283	Account No. 190	Account No. 255	
				Accumulated Deferred Income Taxes (Note C)	Accumulated Deferred Income Taxes (Note C)			Accumulat ed Deferred Income Taxes (Note C)	Accumula ted Deferred Investmen t Credit			
	(a)	CWIP in Rate Base	Held for Future Use	Materials & Supplies	Stores Expense	Prepayments						
		(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
Attachment H-2A, Line No:		44b	28	50	47	45		44(a)				
				227. 8. c + 227.5.c (see Att H- 2A Note U) for end of year, 214 for end of year, records for other months	(227.16.c * Labor Ratio) for end of year, records for other months							
		(Note B)				(Note F)	(Note A)	(Note H)	Attachment 1	Attachment 1	Attachmen t 1	Attachme nt 1
17 December Prior Year Actual		-				#DIV/0!		#DIV/0!				
18 January						#DIV/0!						
19 February						#DIV/0!						
20 March						#DIV/0!						
21 April						#DIV/0!						
22 May						#DIV/0!						
23 June						#DIV/0!						
24 July						#DIV/0!						

25 August					#DIV/0!		
26 September					#DIV/0!		
27 October					#DIV/0!		
28 November					#DIV/0!		
29 December					#DIV/0!		
30 Average of the 13 Monthly Balances (Note D)	-	-	-	-	#DIV/0!	-	#DIV/0!

- Notes:
- A Recovery of regulatory asset or any associated amortization expenses is limited to any regulatory assets authorized by FERC.
  - B Includes only CWIP authorized by the Commission for inclusion in rate base.
  - C ADIT and Accumulated Deferred Income Tax Credits are computed using the average of non-prorated ADIT balances for the beginning of the year and end of the year balances plus the prorated balance.
  - D Calculate using 13 month average balance, except ADIT.
  - E Projected balances are for the calendar year the revenue under this formula begins to be charged.
  - F From Attachment 5 for the end of year balance and records for other months.
  - G In the true-up calculation, actual monthly balance records are used for plant and in the projected calculation, projected monthly balances are used for plant.
  - H Recovery of abandoned plant is limited to any abandoned plant recovery authorized by FERC.

**Rate Base Worksheet - Gross Plant in Service and Accumulated Depreciation (Less Asset Retirement Obligations)**

**(Note A)**

Gross Plant In Service	Asset Retirement Obligations	Gross Plant in Service Less Asset Retirement Obligations
------------------------	------------------------------	--

[illegible]

Attachment H-2A, Line No:

[illegible]

g. + 204-207.74.  
g. + 204-207.83.  
g. + 204-207.98.  
g. for end of year and records for other months



for other  
months

1  
5 December Prior Year Actual

1  
6 January

1  
7 February

1  
8 March

1  
9 April

2  
0 May

2  
1 June

2  
2 July

2  
3 August

2  
4 September

2  
5 October

2  
6 November

**Accumulated Depreciation & Amortization Less Asset Retirement Obligations**

Month

**(b)**

(c)

)

**(i)**

11

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3									
5 June	-	-	-	-	-	-	-	-	-
3									
6 July	-	-	-	-	-	-	-	-	-
3									
7 August	-	-	-	-	-	-	-	-	-
3									
8 September	-	-	-	-	-	-	-	-	-
3									
9 October	-	-	-	-	-	-	-	-	-
4									
0 November	-	-	-	-	-	-	-	-	-
4									
1 December	-	-	-	-	-	-	-	-	-
4	Average of the 13 Monthly								
2	Balances -	-	-	-	-	-	-	-	-

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e

In the true-up calculation, actual monthly balance records are used for plant and in the projected calculation, projected monthly balances are used for A plant.

Baltimore Gas and Electric

Attachment 10 - Merger Costs

(a) (b) (c) (d) (...) (x)

O&M Cost To Achieve

FERC Account		Total	Allocation to Trans.	Total
1	Transmission O&M		100.00%	\$ -
2	A&G		#DIV/0!	#DIV/0!
3				\$ -
4	Total	\$ -		#DIV/0!
5				

6 Depreciation & Amortization Expense Cost To Achieve

FERC Account		Total	Allocation to Trans.	Total
8	General Plant	-	#DIV/0!	#DIV/0!
9	Intangible Plant	-	#DIV/0!	#DIV/0!
10	Common Plant	-	#DIV/0!	#DIV/0!
11	Total	\$ -		#DIV/0!

Capital Cost To Achieve included in Plant General Intangible Common

Gross Plant		Total
12	December Prior Year	\$ -
13	January	\$ -

14 February				\$	-
15 March				\$	-
16 April				\$	-
17 May				\$	-
18 June				\$	-
19 July				\$	-
20 August				\$	-
21 September				\$	-
22 October				\$	-
23 November				\$	-
24 December				\$	-
25 Average	#DIV/0!	#DIV/0!	#DIV/0!		-

Accumulated Depreciation	General	Intangible	Common		Total
26 December Prior Year				\$	-
27 January				\$	-
28 February				\$	-
29 March				\$	-
30 April				\$	-
31 May				\$	-
32 June				\$	-

33 July					\$	-
34 August					\$	-
35 September					\$	-
36 October					\$	-
37 November					\$	-
38 December					\$	-
39 Average	#DIV/0!	#DIV/0!	#DIV/0!			-

Baltimore Gas and Electric

Attachment 10 - Merger Costs

(a)	(b)	(c)	(d)	(...)	(x)
Net Plant = Gross Plant Minus Accumulated Depreciation from above	General	Intangible	Common		Total
40 December Prior Year	-	-	-	-	\$ -
41 January	-	-	-	-	\$ -
42 February	-	-	-	-	\$ -
43 March	-	-	-	-	\$ -
44 April	-	-	-	-	\$ -
45 May	-	-	-	-	\$ -
46 June	-	-	-	-	\$ -
47 July	-	-	-	-	\$ -
48 August	-	-	-	-	\$ -

49 September	-	-	-	-	\$	-
50 October	-	-	-	-	\$	-
51 November	-	-	-	-	\$	-
52 December	-	-	-	-	\$	-
53 Average	-	-	-	-		-

Depreciation	General	Intangible	Common		Total
54 January	-	-	-	\$	-
55 February	-	-	-	\$	-
56 March	-	-	-	\$	-
57 April	-	-	-	\$	-
58 May	-	-	-	\$	-
59 June	-	-	-	\$	-
60 July	-	-	-	\$	-
61 August	-	-	-	\$	-
62 September	-	-	-	\$	-
63 October	-	-	-	\$	-
64 November	-	-	-	\$	-
65 December	-	-	-	\$	-
66 Total	-	-	-	-	\$ -

**Capital Cost To Achieve included in Total Plant in Service**

67 December Prior Year

68 January

69 February

70 March

71 April

72 May

73 June

74 July

75 August

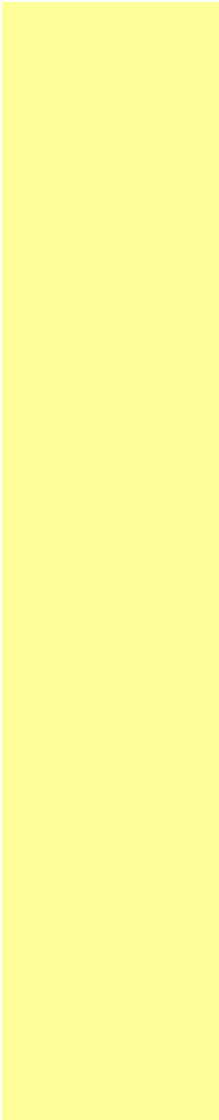
76 September

77 October

78 November

79 December

80 Average



**Baltimore Gas and Electric**  
**Attachment 11 - Depreciation\* and Amortization Rates**

<u>TRANSMISSION PLANT</u>		<b>Deprec.</b>
<b>Account</b>	<b>Account Description</b>	<b>Rate (%)</b>
350.20	LAND RIGHTS	1.19
352.00	STRUCTURES AND IMPROVEMENTS	2.10
353.00	STATION EQUIPMENT	2.81
354.00	TOWERS AND FIXTURES	3.83
355.00	POLES AND FIXTURES	3.85
356.00	OVERHEAD CONDUCTORS AND DEVICES	3.90
357.00	UNDERGROUND CONDUIT	1.90
358.00	UNDERGROUND CONDUCTORS AND DEVICES	2.20
359.00	ROADS AND TRAILS	1.72
<u>GENERAL PLANT - ELECTRIC</u>		<b>Deprec.</b>
<b>Account</b>	<b>Account Description</b>	<b>Rate (%)</b>
390.00	STRUCTURES AND IMPROVEMENTS	4.96
391.10	OFFICE FURNITURE	2.93
391.20	OFFICE EQUIPMENT	8.99
391.33	PERSONAL COMPUTERS	20.52
393.00	STORES EQUIPMENT	6.57
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	5.24
395.00	LABORATORY EQUIPMENT	0.01
397.00	COMMUNICATION EQUIPMENT	6.56
397.64	COMMUNICATION EQUIPMENT – DRI	10.60
398.00	MISCELLANEOUS EQUIPMENT	4.62
<u>GENERAL PLANT - COMMON (ELECTRIC &amp; GAS)</u>		<b>Deprec.</b>
<b>Account</b>	<b>Account Description</b>	<b>Rate (%)</b>
390.00	STRUCTURES AND IMPROVEMENTS	2.57
391.10	OFFICE FURNITURE	5.36
391.20	OFFICE EQUIPMENT	7.23
391.33	COMPUTER EQUIPMENT – OTHER	18.90
391.36	COMPUTER HARDWARE WITH SMART GRID	8.47
392.10	AUTOMOBILES	9.57
392.20	LIGHT TRUCKS UNDER 33,000	8.20
392.30	HEAVY TRUCKS 33,000 AND OVER	6.07
392.40	TRACTORS	5.04
392.60	TRAILERS	4.43
392.70	PRELEASED VEHICLES	17.45
393.00	STORES EQUIPMENT	8.38
394.10	PORTABLE TOOLS	4.44
394.20	SHOP AND GARAGE EQUIPMENT	5.09
394.30	CNG FUELING STATIONS	7.98
395.00	LABORATORY EQUIPMENT	3.78
396.00	POWER OPERATED EQUIPMENT	6.35
397.10	COMMUNICATION EQUIPMENT - OVERHEAD	5.32
397.20	COMMUNICATION EQUIPMENT - UNDERGROUND	5.19
397.30	COMMUNICATION EQUIPMENT - OTHER	4.97
397.60	COMMUNICATION EQUIPMENT - SMART GRID	12.15

398.00

MISCELLANEOUS EQUIPMENT

4.68

INTANGIBLE PLANT

Account	Account Description	Amort. Rate (%)
302	Franchises and Consents	
303	Miscellaneous Intangible Plant	
	2-year plant	50.00
	3-year plant	33.33
	4-year plant	25.00
	5-year plant	20.00
	6-year plant	16.67
	7-year plant	14.29
	8-year plant	12.50
	9-year plant	11.11
	10-year plant	10.00
	11-year plant	9.09
	12-year plant	8.33
	13-year plant	7.69
	14-year plant	7.14
	15-year plant	6.67

Notes:   \*Within five years of the effective date of the Settlement in Docket No ER19-5 et al, and at least every five years thereafter, BGE will file an FPA Section 205 rate proceeding to revise its depreciation rates (unless the company has otherwise submitted an FPA Section 205 rate filing that addresses its depreciation rates in the prior five years).

Depreciation rates as approved by FERC in Docket No. ER21-98.  
Amortization rates as approved by FERC in Docket No. ER21-214.

## ATTACHMENT G

Tax Cuts and Jobs Act of 2017

				ADIT - Pre Rate Change (December 31, 2017)				ADIT - Post Rate Change (December 31, 2017)				Deficient / (Excess) Deferred Income Taxes (December 31, 2017)										
Line	Detailed Description	Description	Category	Federal Gross Timing Difference	Federal ADIT @ 35%	State ADIT	FIT on SIT	Total ADIT	Federal Gross Timing Difference	Federal ADIT @ 21%	State ADIT	FIT on SIT	Total ADIT	Rate Change Deferred Tax Impact	Non-Recoverable	Income Tax Regulatory Asset / Liability Deferred Taxes	Deficient / (Excess) ADIT Balance	Jurisdiction Allocator	Electric Transmission	Allocator (Note B)	Transmission Allocated	FERC Account
	(A)	(B)	(C)	(D)	(E) = (D) * 35%	(F)	(G) = (F) * 35%	(H) = (E) + (F) + (G)	(I)	(J) = (I) * 21%	(K)	(L) = (K) * 21%	(M) = (J) + (K) + (L)	(N) = (H) - (M)	(O)	(P)	(Q) = (N) - (O) - (P)	(R)	(S)	(T)	(U) = (Q) * (T)	(V)
FERC Account 190 (Note A)																						
1	Accrued Bonus	Accrued Bonus	Unprotected Non-Property	\$ -			\$ -	\$ -	\$ -	\$ -		\$ -	\$ -	\$ -		\$ -	\$ -	100% Distribution	No	0.00%	\$ -	190
2	Accrued Benefits	BCBS Claim Adjustment	Unprotected Non-Property	-			-	-	-	-		-	-	-		-	-	100% Distribution	No	0.00%	-	190
3	Allowance for Doubtful Accounts	Allowance for Doubtful Accounts	Unprotected Non-Property	-			-	-	-	-		-	-	-		-	-	100% Distribution	No	0.00%	-	190
4	Charitable Contributions	Charitable Contributions	Unprotected Non-	-			-	-	-	-		-	-	-		-	-	100% Distri	No	0.00%	-	190

			Property																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
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14	Purchase of Receivables	Miscellaneous	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
15	Long Term Incentives	Miscellaneous	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
16	Other (190)	Miscellaneous	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
17	Workers Compensation Accruals	Workers Compensation Reserve	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
18	Vacation Pay Accruals	Vacation Pay	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
19	Pension	Pension	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	A&G Ratio	Yes	11.985%	-	190
20	Reg Liab - AMI	Reg Liab	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
21	State NOL	Net Operating Losses (Federal and State)	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	A&G Ratio	Yes	11.985%	-	190
22	ITC Federal Carryforward FAS 109	Deferred ITC	Unprotected Non-Property	-	-	-	-	-	-	-	-	-	-	100% Distribution	No	0.000%	-	190
23	NonTCJA	Deferred ITC	Unprot	-	-	-	-	-	-	-	-	-	-	N/A	No	0.000%	-	190

			ected Non- Propert y															0 %		
24	FAS109 TCJA	Reg Liab	Unprot ected Non- Propert y	-	-	-	-	-	-	-	-	-	-	-	-	-	N/A	No	0.00 0 %	19 0
25	<b>Total FERC Account 190</b>			<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>			<b>\$</b>	
				-	-	-	-	-	-	-	-	-	-	-	-	-			-	

**FERC Account  
282 (Note A)**

26	Fixed Asset Basis Differences (PowerTax) - Protected	Plant Related Deferred Taxes	Protect ed Propert y	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	Plant	Yes	15 .2 16 %	\$ -	28 2
27	Fixed Asset Basis Differences (PowerTax) - Non-Protected	Plant Related Deferred Taxes	Unprot ected Propert y	-		-	-	-	-	-	-	-	-			-	Plant	Yes	15 .2 16 %	-	28 2
28	FAS109 TCJA	Plant Related Deferred Taxes	Unprot ected Propert y	-	-	-	-	-	-	-	-	-	-			-	Plant	No	0. 00 0 %	-	28 2
29	FAS 109 NonTCJA	Plant Related Deferred Taxes	Unprot ected Propert y	-		-	-	-	-	-	-	-	-			-	Plant	No	0. 00 0 %	-	28 2
30	ARO	ARO	Unprot ected Propert y	-		-	-	-	-	-	-	-	-			-	Plant	No	0. 00 0 %	-	28 2
31	Fixed Asset Basis Differences (Non-PowerTax) - Non-Protected	Plant Related Deferred Taxes	Unprot ected Propert y	-		-	-	-	-	-	-	-	-			-	100 % Elect ric	No	0. 00 0 %	-	28 2
32	Fixed Asset Basis Differences (Non-PowerTax) - Non-Protected	Plant Related Deferred Taxes	Unprot ected Propert y	-		-	-	-	-	-	-	-	-			-	100 % Elect ric	No	0. 00 0 %	-	28 2
33	Total FERC Account 282			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -				\$ -	

**FERC Account**

283 (Note A)

34	AMI Regulatory Asset	AMI Reg Asset	Unprot ected Non-Propert y	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	100 % Distri butio n	No	0. 00 0 %	\$ -	28 3
35	Deferred Fuel	Deferred Fuel	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	N/A	No	0. 00 0 %	\$ -	28 3
36	DRI Program	DRI Program	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	100 % Distri butio n	No	0. 00 0 %	\$ -	28 3
37	Energy Efficiency Programs	Energy Efficiency Program	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	100 % Distri butio n	No	0. 00 0 %	\$ -	28 3
38	Loss on Reacquired Debt	Loss on Reacquired Debt	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	A&G Rati o	Yes	10 0. 00 0 %	\$ -	28 3
39	POLR	POLR	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	N/A	No	0. 00 0 %	\$ -	28 3
40	Property Tax Payable	Property Tax Payable	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-		Yes	10 0. 00 0 %	\$ -	28 3
41	Regulatory Asset - Legacy Meters	Legacy Meters	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	N/A	No	0. 00 0 %	\$ -	28 3
42	Regulatory Asset - ARO	Reg Asset - ARO	Unprot ected Non-Propert y	-		-	-	-	-	-	-	-	-	N/A	No	0. 00 0 %	\$ -	28 3

43	Regulatory Asset - Electric Trans Rt True Up	Reg Asset Elec Trans Rt True Up	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	N/A	No	0.000 %	\$ -	283
44	Regulatory Asset-Spring Gardens	Environme ntal Clean Up Costs Prv	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100 % Distri butio n	No	0.000 %	\$ -	283
45	ERI	ERI Overrecove ry	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100 % Distri butio n	No	0.000 %	\$ -	283
46	RIF Reg Asset	RIF Reg Asset Amort	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100 % Distri butio n	No	0.000 %	\$ -	283
47	Rate Case Reg Asset	Reg Asset - Rate Case	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100 % Distri butio n	No	0.000 %	\$ -	283
48	Reg Asset - Cost to Achieve	Reg Asset - Cost to Achieve	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100 % Distri butio n	No	0.000 %	\$ -	283
49	Reg Liab - Smart Energy Rewards	Reg Asset - Smart Energy Rewards	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100 % Distri butio n	No	0.000 %	\$ -	283
50	Reg Liab - Stride	STRIDE Overrecove ry	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	N/A	No	0.000 %	\$ -	283
51	Severance Prepaid Software & License	Severance Cost - Reg Asset	Unprot ected Non-Propert y	-	-	-	-	-	-	-	-	-	-	-	100 % Distri butio n	No	0.000 %	\$ -	283
52		Prepaid IT	Unprot	-	-	-	-	-	-	-	-	-	-	-	A&G	Yes	10.0 %	\$ -	283

## Instructions

Page 7

income tax balance sheet accounts (Accounts 190, 281, 282 and 283) based on the nature of the temporary difference and the related classification requirements of the accounts. If as a result of action or expected action by a regulator, it is probable that the effect of a future increase or decrease in taxes payable resulting from a change in tax law or rates will be recovered from or passed through to customers through future rates, a regulatory asset or liability is recognized in Account 182.3 (Other Regulatory Assets), or Account 254 (Other Regulatory Liabilities), as appropriate, for that probable future revenue or reduction in future revenue. The amortization of deficient and excess deferred income taxes that will be recovered from or passed through to customers through future rates will be recorded in FERC Accounts 410.1 (Provision for Deferred Income Taxes, Utility Operating Income) and 411.1 (Provision for Deferred Income Taxes—Credit, Utility Operating Income), as appropriate. Re-measurements of deferred tax balance sheet accounts may also result in re-measurements of tax-related regulatory assets or liabilities that had been recorded prior to the change in tax law. If it is not probable that the effect of a future increase or decrease in taxes payable resulting from a change in tax law or rates will be recovered from or passed through to customers through future rates, tax expense will be recognized in Account 410.2 (Provision for Deferred Income Taxes, Other Income or Deductions) or tax benefit is recognized in Account 411.2 (Provision for Deferred Income Taxes-Credit, Other Income or Deductions), as appropriate.

2. For deficient and (excess) accumulated deferred income taxes (ADIT) related to change(s) to income tax rates occurring after September 30, 2018, insert calculations that support the re-measurement amount delineated by category (i.e., protected property, unprotected property, and unprotected non-property).

3. Set the allocation percentages equal to the applicable percentages at the date of the rate change.

Notes

- A

Categorization of items as protected or non-protected will remain as originally agreed, absent a change in guidance from the Internal Revenue Service (IRS) with respect to that items. Balances associated with the tax rate change will not be adjusted (except for amortization each year) absent audit adjustments, tax return amendments, or a change in IRS guidance. Any resulting changes will be prominently disclosed including the basis for the change.
- B

The allocation percentage in Column T are based on the applicable percentages at the date of the rate change and must remain fixed absent the Commission's express approval.

END

Attachment 2 - Taxes Other Than Income Worksheet

Other Taxes		Page 262-263 Col (I)	Allocator	Allocated Amount
<b>Plant Related</b>			Gross Plant Allocator	
1	Real property (State, Municipal or Local)			
2	Personal property			
3	Capital Stock Tax			
4	Gross Premium (insurance) Tax			
5	PURTA			
6	Corp License			
<b>Total Plant Related</b>		-	#DIV/0!	#DIV/0!
<b>Labor Related</b>			Wages & Salary Allocator	
7	Federal FICA			
8	Unemployment			
<b>Total Labor Related</b>		-	#DIV/0!	#DIV/0!
<b>Other Included</b>			Gross Plant Allocator	
9	Miscellaneous			
10	Use & Sales Tax			
<b>Total Other Included</b>		-	#DIV/0!	#DIV/0!
<b>Total Included</b>				#DIV/0!
<b>Currently Excluded</b>				
11	Federal Income			
12	Maryland Income			
13	Pennsylvania Income			
14	Franchise			
15	PSC Assessment			
16	Environmental Surcharge			
17	Pole License			
18	Fuel Energy			
19	Montgomery County Fuel Energy			
20	Universal Service Fund			

21	Total	-
22	Total "Taxes Other Than Income Taxes" – Page 114-117 line 14.g plus line 15.g plus line 16.g	
23	Difference	-

Criteria for Allocation:

- A Other taxes that are incurred through ownership of plant including transmission plant will be allocated based on the Gross Plant Allocator. If the taxes are 100% recovered at retail they may not be included
- B Other taxes that are incurred through ownership of only general or intangible plant will be allocated based on the Wages and Salary Allocator. If the taxes are 100% recovered at retail they may not be included
- C Other taxes that are assessed based on labor, will be allocated based on the Wages and Salary Allocator
- D Other taxes except as provided for in A, B and C above, that are incurred and (1) are not fully recovered at retail or (2) are directly or indirectly related to transmission service will be allocated based on the Gross Plant Allocator; provided, however, that overheads shall be treated as in footnote B above

Baltimore Gas and Electric Company  
Attachment 3 - Revenue Credit Workpaper

		Total Amount	Allocation Factor	Allocation %	Total Amount Included in Rates
<b>Account 454 - Rent from Electric Property</b>					
1	Rent from Electric Property - Transmission Related (Note 3)				
2	Total Rent Revenues	(Sum Line 1)	Transmission	100%	-
<b>Account 456 - Other Electric Revenues (Note 1)</b>					
3	Schedule 1A		Transmission	100%	
4	Net revenues associated with Network Integration Transmission Service (NITS) for which the load is not included in the divisor (difference between NITS credits from PJM and PJM NITS charges paid by Transmission Owner) (Note 4)		Transmission	100%	-
5	Point to Point Service revenues for which the load is not included in the divisor received by transmission owner		Transmission	100%	
6	PJM Transitional Revenue Neutrality (Note 1)		Transmission	100%	-
7	PJM Transitional Market Expansion (Note 1)		Transmission	100%	-
8a	Professional Services (Note 3, Transmission Related)		Transmission	100%	-
8b	Professional Services (Note 3, Labor Related)		Wages and Salaries		
9	Revenues from Directly Assigned Transmission Facility Charges (Note 2)		Transmission	100%	-
10	Rent or Attachment Fees associated with Transmission Facilities (Note 3)		Transmission	100%	-
11	Gross Revenue Credits	(Sum Lines 2-10)	Transmission	100%	-
12	Less line 17g				-
13	Total Revenue Credits				-
<b><u>Revenue Adjustment to determine Revenue Credit</u></b>					
14	Note 1: All revenues related to transmission that are received as a transmission owner (i.e., not received as a LSE), for which the cost of the service is recovered under this formula, except as specifically provided for elsewhere in this Attachment or elsewhere in the formula will be included as a revenue credit or included in the peak on line 172 of Appendix A.				
15	Note 2: If the costs associated with the Directly Assigned Transmission Facility Charges are included in the Rates, the associated revenues are included in the Rates. If the costs associated with the Directly Assigned Transmission Facility Charges are not included in the Rates, the associated revenues are not included in the Rates.				
16	Note 3: Ratemaking treatment for the following specified secondary uses of transmission assets: (1) right-of-way leases and leases for space on transmission facilities for telecommunications; (2) transmission tower licenses for wireless antennas; (3) right-of-way property leases for farming, grazing or nurseries; (4) licenses of intellectual property (including a portable oil degasification process and scheduling software); and (5) transmission maintenance and consulting services (including energized circuit maintenance, high-voltage substation maintenance, safety training, transformer oil testing, and circuit breaker testing) to other utilities and large customers (collectively, products). Company will retain 50% of net revenues consistent with Pacific Gas and Electric Company, 90 FERC ¶ 61,314. Note: in order to utilize lines 17a - 17g, the utility must track in separate subaccounts the revenues and costs associated with each secondary use (except for the cost of the associated income taxes).				
17a	As discussed in Note 3 above, revenues included in lines 1-11 which are subject to 50/50 sharing.	-			
17b	Costs associated with revenues in line 17a				
17c	Net Revenues (17a - 17b)	-			

17d	50% Share of Net Revenues (17c/2)	-
17e	Costs associated with revenues in line 17a that are included in FERC accounts recovered through the formula times the allocator used to functionalize the amounts in the FERC account to the transmission service at issue.	
17f	Net Revenue Credit (17d + 17e)	-
17g	Line 17f less line 17a	-
18	Note 4: If the facilities associated with the revenues are not included in the formula, the revenue is shown here, but not included in the total above and is explained in the Cost Support; for example, revenues associated with distribution facilities. In addition, revenues from Schedule 12 are not included in the total above to the extent they are credited under Schedule 12.	
19	Amount offset in line 4 above	
20	Total Account 454 and 456	-
	FN1 #	-
	Difference	-

Baltimore Gas and Electric Company  
Attachment 4 - Calculation of 100 Basis Point Increase in ROE

Return and Taxes with 100 Basis Point increase in ROE					
A	100 Basis Point increase in ROE and Income Taxes		(Line 126 + Line 137)		#DIV/0!
B	100 Basis Point increase in ROE			1.00%	
Return Calculation					
59	Rate Base		(Line 39 + 58)		#DIV/0!
Long Term Interest					
99	Long Term Interest		p114-117.62.c through 67.c		0
	Less LTD Interest on Securitization Bonds				
100		Note P on Appendix A	Attachment 8		
101	Long Term Interest		(Line 99 - 100)		0
102	Preferred Dividends	enter positive	p118-119.29.c		0
Common Stock					
103	Proprietary Capital		p112-113.16.c		0
104	Less Preferred Stock	enter negative	(Line 113)		0
105	Less Account 216.1	enter negative	p112-113.12.c		0
105a	Less Account 219	enter negative	P112-113.15.c		0
106	Common Stock	(Note Y)	(Sum Lines 103 to 105a)		0
Capitalization					
107	Long Term Debt		p112-113.18.d through 21.d		0
108	Less Loss on Reacquired Debt	enter negative	p110-111.81.c		0
109	Plus Gain on Reacquired Debt	enter positive	p112-113.61.c		0
110	Less ADIT associated with Gain or Loss	enter negative	Attachment 1		0
111	Less LTD on Securitization Bonds	enter negative	Attachment 8		0
112	Total Long Term Debt	(Note Z)	(Sum Lines 107 to 111)		0
113	Preferred Stock	(Note AA)	p112-113.3.c		0
114	Common Stock		(Line 106)		0
115	Total Capitalization		(Sum Lines 112 to 114)		0
116	Debt %	Total Long Term Debt	(Line 112 / 115)		0%
117	Preferred %	Preferred Stock	(Line 113 / 115)		0%
118	Common %	Common Stock	(Line 114 / 115)		0%
119	Debt Cost	Total Long Term Debt	(Line 101 / 112)		0.0000
120	Preferred Cost	Preferred Stock	(Line 102 / 113)		0.0000
121	Common Cost	See (Note J) on Appendix A	Common Stock	Appendix A % plus 100 Basis Pts	0.1150
122	Weighted Cost of Debt	Total Long Term Debt (WCLTD)	(Line 116 * 119)		0.0000
123	Weighted Cost of Preferred	Preferred Stock	(Line 117 * 120)		0.0000
124	Weighted Cost of Common	Common Stock	(Line 118 * 121)		0.0000
125	Total Return ( R )		(Sum Lines 122 to 124)		0.0000
126	Investment Return = Rate Base * Rate of Return		(Line 59 * 125)		#DIV/0!

Composite Income Taxes (Note L)

Income Tax Rates					
127	FIT=Federal Income Tax Rate		(Note I from ATT H-2A)		0.00%
128	SIT=State Income Tax Rate or Composite		(Note I from ATT H-2A)		0.00%
129	p	P = (percent of federal income tax deductible for state purposes)		Per State Tax Code	0.00%
130	T	T=1 - {[(1 - SIT) * (1 - FIT)] / (1 - SIT * FIT * p)} =			0.00%
131	T/ (1-T)				0.00%
132	Tax Gross-Up Factor	1/(1-T)			

	<b>Investment Tax Credit Adjustment</b>	(Note T from ATT H-2A)		
133	Investment Tax Credit Amortization	enter negative	Attachment 1B – ADIT EOY	0
134	Tax Gross-Up Factor [1/(1-T)]		(Line 132)	0.00%
135	<b>ITC Adjustment Allocated to Transmission</b>		[Line 133 *134]	#DIV/0!
	<b>Other Income Tax Adjustment</b>			
136a	Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense	(Note V from ATT H-2A)	Attachment 5, Line 136a	0
136b	Amortization Deficient / (Excess) Deferred Taxes (Federal) - Transmission Component	(Note V from ATT H-2A)	Attachment 5, Line 136b	
136c	Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component	(Note V from ATT H-2A)	Attachment 5, Line 136c	
136d	Amortization of Other Flow-Through Items - Transmission Component	(Note V from ATT H-2A)	Attachment 5, Line 136d	
136e	Other Income Tax Adjustments - Expense / (Benefit)		Line 136a + 136b + 136c + 136d	
136f	Tax Gross-Up Factor [1/(1-T)]		Line 132	
136g	Other Income Tax Adjustment		Line 136e*136f	
136h	<b>Income Tax Component =</b>	$CIT=(T/1-T) * \text{Investment Return} * (1-(WCLTD/R)) =$	[Line 131 * 126 * (1-(122 / 125))]	#DIV/0!
137	<b>Total Income Taxes</b>		(Line 135 + 136g + 136h)	#DIV/0!

Baltimore Gas and Electric Company  
Attachment 5 - Cost Support

Electric / Non-electric Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Electric Portion	Non-electric Portion	Details
Allocated General & Common Expenses							
65	Plus Transmission Lease Payments	(Note A)	P200-201.4.c				
67	Common Plant O&M	(Note A)	p356				
Depreciation Expense							
85	Transmission Depreciation		p336.7.b / Projected				
86	General Depreciation		p336.10.b / Projected				
87	Intangible Amortization	(Note A)	p336.1.d / Projected			0	Amount in Form 1 is already electric only.
91	Common Depreciation - Electric Only	(Note A)	p336.11.b / Projected			0	Amount in Form 1 is already electric only.
92	Common Amortization - Electric Only	(Note A)	p336.11.d / Projected			0	Amount in Form 1 is already electric only.

Transmission / Non-transmission Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Transmission Related	Non-transmission Related	Details
28	Plant Held for Future Use (Including Land)	(Note C)	p214 (See Attachment 9, line 30, column c)				Specific identification based on plant records 1 2 3 4 5

CWIP & Expensed Lease Worksheet

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	CWIP In Form 1 Amount	Expensed Lease in Form 1 Amount	Details
Plant Allocation Factors							
6	Electric Plant in Service	0	p204-207.104.g		0	0	See Form 1
Plant In Service							
19	Transmission Plant In Service	0	p204-207.58.g		0	0	See Form 1
24	Common Plant (Electric Only)	(Notes A)	p356		0	0	Electric / non-electric cost support above
Accumulated Depreciation							
30	Transmission Accumulated Depreciation	0	p219.25.c		0	0	See Form 1

EPRI Dues Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	EPRI Dues	Details
Allocated General & Common Expenses						
72	Less EPRI Dues	(Note D)	p352-353			EPRI Dues paid by Holding company (Constellation Energy)

Total Electric Administrative & General Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Non-Recoverable Costs (including Merger Costs)	Recoverable Costs	Details
Allocated General & Common Expenses							
68	Total A&G	0	p320-323.197.b		0.00	0.00	See Form 1

Regulatory Expense Related to Transmission Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Transmission Related	Non-transmission Related	Details
Allocated General & Common Expenses							
70	Less Regulatory Commission Exp Account 928	(Note E)	p320-323.189.b				
Directly Assigned A&G							
76	Regulatory Commission Exp Account 928	(Note G)	p320-323.189.b		0	0	Included amount associated with proceedings before FERC.

Safety Related Advertising Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Safety Related	Non-safety Related	Details
Directly Assigned A&G							
80	General Advertising Exp Account 930.1	(Note F)	p320-323.191.b			-	Electric advertising cost in account 930.1 associated with safety

MultiState Workpaper

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				State 1	State 2	State 3	State 4	State 5	Details
Income Tax Rates									
128	SIT=State Income Tax Rate or Composite	(Note I)	0	Maryland	Enter State Enter %	Enter State Enter %	Enter State Enter %	Enter State Enter %	Enter Calculation Maryland Only

Education and Out Reach Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Education & Outreach	Other	Details
Directly Assigned A&G							
77	General Advertising Exp Account 930.1	(Note K)	p320-323.191.b	-	0	0	

Excluded Plant Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Excluded Transmission Facilities		Description of the Facilities
Adjustment to Remove Revenue Requirements Associated with Excluded Transmission Facilities						
148	Excluded Transmission Facilities	(Note M)	Attachment 5		0	General Description of the Facilities
	Instructions:			Enter \$		None
1	Remove all investment below 69 kV or generator step up transformers included in transmission plant in service that are not a result of the RTEP Process					
2	If unable to determine the investment below 69kV in a substation with investment of 69 kV and higher as well as below 69 kV, the following formula will be used:			Or		
				Enter \$		
A	Total investment in substation		1,000,000			
B	Identifiable investment in Transmission (provide workpapers)		500,000			
C	Identifiable investment in Distribution (provide workpapers)		400,000			
D	Amount to be excluded (A x (C / (B + C)))		444,444			
				Add more lines if necessary		

Outstanding Network Credits Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Outstanding Network Credits		Description of the Credits
Network Credits						
55	Outstanding Network Credits	(Note N)	From PJM		0	General Description of the Credits
				Enter \$		None
56	Less Accumulated Depreciation Associated with Facilities with Outstanding Network Credits	(Note N)	From PJM		0	

Unfunded Reserves

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions

44

Total Reserves Account Balance Attributable to Transmission

Long-Term (defined as being due more than 1 year from each month-end balance sheet date) Portions recorded in FERC Accounts (242, 232, 253, 228.1, 228.2, 228.3, & 228.4) and the long-term accrued portions of below items that have not yet been transferred to trusts, escrow accounts or restricted accounts, but are still in general accounts as of month-end and therefore available to Company.

FERC Account 228.1

FERC Account 228.2

FERC Account 228.3

FERC Account 228.4

FERC Account 232

FERC Account 242

FERC Account 253

13-Month Average  
Total Reserves

Total Reserves 13-Month Average Account Balance Attributable to Transmission

Attachment H-2A Line 44

Note: The Formula Rate shall include a credit to rate base for all long-term unfunded reserves (funds collected from customers that (1) have not been set aside in a trust, escrow or restricted account; (2) whose balance is collected from customers through cost accruals to accounts that are recovered under the Formula Rate; and (3) exclude the portion of any balance offset by a balance sheet account). The unfunded reserve allocators will utilize the same allocators used in the formula for the cost accruals to the account that is recovered under the Formula Rate. Since reserves can be created by an offsetting balance sheet account, rather than through cost accruals, the amount to be deducted from rate base should exclude the portion offset by another balance sheet account. Additionally, balances where the related expense was recorded either below the line, 100% to a line of business other than wholesale transmission, or to an expense account not included in the formula rate should not be included in the account reserves deducted from rate base. The gas share of common expenses is also excluded from the above computation. See supporting worksheet that derives the 13-month average balances shown above.

## Prepayments

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions															Description of the Prepayments	
<p><b>45 Prepayments</b> (limited to balance in account 165 except for prepaid pension)</p>	December Prior Year	January	February	March	April	May	June	July	August	September	October	November	End of Year December	Allocator	Allocation Factor (Gross Plant, Wage and Salary Ratio, or Excluded)	
<p>Detail of Prepayments Included</p> <p>p.110-111, L57</p>																
<p>Prepaid Pensions if not included in Prepayments</p> <p>Total Monthly Balance Included in Rates</p>	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!		Wage and Salary Ratio	<p>Prepaid Pension is recorded in FERC account 186 (see FERC Form 1 page 233).</p> <p>Attachment 9, line 17-29, column f</p>

### Extraordinary Property Loss

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions			Amount	Number of years	Amortization	w/ interest
61	Less extraordinary property losses	Attachment 5				
62	Plus amortization of extraordinary property losses	Attachment 5			\$ -	\$ -

### Abandoned Plant Calculations

<u>Abandoned Plant Calculations</u>					-	-	
-	-	<u>Description</u>	<u>Model Reference</u>	-	<u>Dedicated Facilities</u>	<u>MAPP</u>	<u>Baseline Upgrade b1254</u>

<u>a</u>	-	Beginning Balance of Unamortized Transmission Projects	Per PJM Interconnection, L.L.C. and Baltimore Gas & Electric Co., 150 FERC ¶ 61,054 (2015) and PJM Interconnection, L.L.C., Baltimore Gas & Electric Co., 152 FERC ¶ 61,254 (2015) and PJM Interconnection, L.L.C. and Baltimore Gas & Electric Co., XXX FERC ¶ XX,XXX (XXXX)			
<u>b</u>	-	Years remaining in Amortization Period	Per PJM Interconnection, L.L.C. and Baltimore Gas & Electric Co., 150 FERC ¶ 61,054 (2015) and PJM Interconnection, L.L.C., Baltimore Gas & Electric Co., 152 FERC ¶ 61,254 (2015) and PJM Interconnection, L.L.C. and Baltimore Gas & Electric Co., XXX FERC ¶ XX,XXX (XXXX)			
<u>c</u>	-	Transmission Depreciation Expense Including Amortization of Limited Term Plant <sup>1</sup>	(line a / line b)	#DIV/0!	#DIV/0	#DIV/0
<u>d</u>	-	Ending Balance of Unamortized Transmission Projects	(line a - line c)	#DIV/0!	#DIV/0!	#DIV/0
<u>e</u>	-	Average Balance of Unamortized Abandoned Transmission Projects <sup>2</sup>	(line a + d)/2	#DIV/0!	#DIV/0!	#DIV/0
<u>f</u>	-	Non-Incentive Return and Income Taxes	(Appendix A line 144+ line 145)	#DIV/0!	#DIV/0!	#DIV/0
<u>g</u>	-	Rate Base	(Appendix A line 59)	#DIV/0!	#DIV/0!	#DIV/0
<u>h</u>	-	Non-Incentive Return and Income Taxes <sup>3</sup>	(line f / line g)	#DIV/0!	#DIV/0!	#DIV/0
1- See row 85a, Appendix A. See also amortization included in Attachment 7 revenue requirement calculation.			-			
2- See row 44a, Appendix A. See also investment included in Attachment 7 revenue requirement calculation.			-			
3- Carrying charge rate to be used when computing the revenue requirement for all abandonment plant facilities (see Attachment 7).						

Interest on Outstanding Network Credits Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Interest on Network Credits	Description of the Interest on the Credits
154	##	Interest on Network Credits	(Note N)PJM Data	0 Enter \$	General Description of the Credits None  Add more lines if necessary

Facility Credits under Section 30.9 of the PJM OATT paid by Utility

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions		Amount	Description & PJM Documentation
171	Net Revenue Requirement Net Zonal Revenue Requirement	-	

PJM Load Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions		1 CP Peak	Description & PJM Documentation
172	Network Zonal Service Rate 1 CP Peak	(Note L)PJM Data	PJM Zonal Peak Load per 34.1 of the PJM OATT

Statements BG/BH (Present and Proposed Revenues)

Customer	Billing Determinants	Current Rate	Proposed Rate	Current Revenues	Proposed Revenues	Change in Revenues
BG&E Zone			#DIV/0!	-	#DIV/0!	#DIV/0!
				-		
Total				-	#DIV/0!	#DIV/0!

PBOP Expense in FERC 926

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions	Total A&G Form 1 Amount	Account 926 Form 1 Amount	PBOP in FERC 926 current rate year	PBOP in FERC 926 prior rate year	Explanation of change in PBOP in FERC 926
68	Total A&G	Total: p.320-323.197.b Account 926: p.320-323.187.b and c			

Other Income Tax Adjustments

Line	Component Descriptions	Instruction References	Transmission Depreciation Expense Amount	Tax Rate from Attachment H-2A, Line 130	Amount to Attachment H-2A, Line 136e
136a	Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense Amortization of Deficient / (Excess) Deferred Taxes - Transmission Component	Instr. 1, 2, 3 below	\$	X	\$
136b	Amortization Deficient / (Excess) Deficient Deferred Taxes (Federal) - Transmission Component	Instr. 4 below			
136c	Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component	Instr. 4 below			-
136d	Amortization of Other Flow-Through Items - Transmission Component	Instr. 5 below			
136e	Total Other Income Tax Adjustments - Expense / (Benefit)	Instr. 6 below			\$

<u>Instr. #s</u>	<u>Instructions</u>
Inst. 1	Transmission Depreciation Expense is the gross cumulative amount based upon tax records of capitalized AFUDC equity embedded in the gross plant attributable to the transmission function multiplied by the Capital Recovery Rate (described in Instruction 2).
Inst. 2	Capital Recovery Rate is the book depreciation rate applicable to the underlying plant assets.
Inst. 3	"AFUDC Equity" category reflects the nondeductible component of depreciation expense related to the capitalized equity portion of Allowance for Funds Used During Construction (AFUDC).
Inst. 4	Upon enactment of changes in tax law, accumulated deferred income taxes are re-measured and adjusted in the Company's books of account, resulting in deficient or (excess) accumulated deferred income taxes (ADIT). Such deficient or (excess) ADIT attributed to the transmission function will be based upon tax records and calculated in the calendar year in which the deficient or (excess) amount was measured and recorded for financial reporting purposes. See Attachment 1E - EDIT Amortization, Column G, Line 50 and Line 79 for additional information and support for the current year amortization. The current year amortization of deficient and (excess) ADIT is recorded in FERC Accounts 410.1 and 411.1.
Inst. 5	Other Flow-Through Items - In the past regulatory agencies required certain federal and state income tax savings resulting from temporary differences between the amount of taxes computed for ratemaking purposes and taxes on the amount of actual current federal income tax liability to be immediately "flowed through" rates for certain assets. The "flow-through" savings were accounted for in deferred tax balances, based on the expectation and understanding that while tax savings would be immediately flowed through to ratepayers, the flow-through expense incurred when the temporary differences reverse would be recovered from ratepayers. The "Amortization of Other Flow-Through Items" represents the transmission portion of tax expense relating to the reversal of these temporary differences. The Other Flow-Through balance as of September 30, 2018 will reverse beginning October 1, 2018 based on the prescribed period.
Inst. 6	Negative amounts (i.e. tax benefits) reduce recoverable tax expense and positive amounts (i.e. tax expense) increase recoverable tax expense.

Baltimore Gas and Electric Company  
Attachment 5a - Allocations of Costs to Affiliates

Summary of Administrative and General Expense (A&G) Charged to BGE by Exelon Business Services Company (BSC)

Expense Items	Amount Allocated to BG&E Electric	Amount Allocated to BG&E Gas
A&G		
Explanation of the method		

**Baltimore Gas and Electric Company**  
**Attachment 6 - Reconciliation Worksheet**

Step

1    Calculation of Calendar Revenues for Trued-Up Year

Line #			[Insert Date] Update	[Insert Date] Update	
1	Rate (\$/MW-Year)	Line 173 of Applicable Update			
2	Daily Rate (\$/MW-Day)	Line 1 / number of days in the year	0.00	0.00	
3	Number of Days Effective in the calendar Year				
4	1 CP Peak	Line 172 of Applicable Update			
5	Total PJM Billed Revenues from applicable update	Lines 2 x 3 x 4	-	-	
6	True-Up from applicable update	Line 168 of Applicable Update	-	-	
7	Effective Number of Days in Calendar Year				
8	Total Number of Days in Calendar Year				
9	True-Up Included in PJM Billed Revenues Above	Lines 6 x 7 / 8	-	-	Total
10	Billed PJM Revenues, Excluding Impact of True-Up	Line 5 minus Line 9			-

2    Comparison of Trued-Up File to Calendar Revenues

Trued-Up Revenue Requirement per Line 167, 169 & 170 of Attachment H2-A		Calendar Revenues Per Step 1 above				
-	-	=	-			
Interest on Amount of Refunds or Surcharges Interest 35.19a for March Current Yr						
Month	Yr	1/12 of Step 2	Interest 35.19a for March Current Yr	Months	Interest	(Refund)/Charge
Jun	-		0.0000%	11.5	-	-
Jul	-		0.0000%	10.5	-	-
Aug	-		0.0000%	9.5	-	-
Sep	-		0.0000%	8.5		-

	-		-	
Oct	-	0.0000%	7.5	-
Nov	-	0.0000%	6.5	-
Dec	-	0.0000%	5.5	-
Jan	-	0.0000%	4.5	-
Feb	-	0.0000%	3.5	-
Mar	-	0.0000%	2.5	-
Apr	-	0.0000%	1.5	-
May	-	0.0000%	0.5	-
Total	-			-

	Balance	Interest	Amort	Balance
Jun	-	0.0000%	-	-
Jul	-	0.0000%	-	-
Aug	-	0.0000%	-	-
Sep	-	0.0000%	-	-
Oct	-	0.0000%	-	-
Nov	-	0.0000%	-	-
Dec	-	0.0000%	-	-
Jan	-	0.0000%	-	-
Feb	-	0.0000%	-	-
Mar	-	0.0000%	-	-
Apr	-	0.0000%	-	-
May	-	0.0000%	-	-
Total with interest			-	

The difference between the Trued-Up Revenue Requirement and the calendar billed revenues

(excl true-up) with interest -

Prior Period Adjustments	-	Note 1
	Total true-up amount	-
Rev Req based on Current Year data before True-Up + Incentive Revenues + 30.9 Credits	#DIV/0!	Note 2
Total Revenue Requirement	#DIV/0!	

Note 1  
Prior Period Adjustment is the amount of an adjustment to correct an error in a prior period. The adjustment will include

a gross-up for income tax purposes, as appropriate. The FERC Refund interest rate specified in CFR 35.19(a) for the period up to the date the projected rates that are subject to True-up here went into effect will be used in the calculation.

Please note that the "Rev Req based on Current Year data before True-Up + Incentive Revenues + 30.9 Credits" will be populated in the Projected Transmission Revenue Requirement (PTRR) but will not be populated in the Actual Transmission Revenue Requirement (ATRR).

Note  
2

New Plant Carrying Charge		
FCR if not a CIAC	Formula Line	
A	159	Net Plant Carrying Charge without Depreciation
B	166	Net Plant Carrying Charge per 100 basis point increase in ROE without Depreciation
C		Line B less Line A

The FCR resulting from Formula in a given year is used for that year only.

Therefore actual revenues collected in a year do not change based on cost data for subsequent years

Per FERC's orders in Docket No. ER07-576, the Conastone and Waugh Chapel substation projects, the Downtown Project, and the Northwest to Finkburg project get an ROE of 11.5%. The rest of transmission rate base gets an ROE of 10.5% which includes a 50 basis point RTO transmission planning participation adder approved in Baltimore Gas and Electric Co., Docket No. ER07-576, by order issued on July 24, 2007.

Page 1

W/O Enhancement	2021	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	!	#DIV/0!			-	-	-	-				
W Enhancement	2021	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0!	#DIV/0!			-	-	-	-				
W/O Enhancement	2022	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0!	#DIV/0!			-	-	-	-				
W Enhancement	2022	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0!	#DIV/0!			-	-	-	-				
W/O Enhancement	2023	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0!	#DIV/0!			-	-	-	-				
W Enhancement	2023	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0!	#DIV/0!			-	-	-	-				
W/O Enhancement	2024	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0!	#DIV/0!			-	-	-	-				
W Enhancement	2024	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0!	#DIV/0!			-	-	-	-				
W/O Enhancement	2025	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0!	#DIV/0!			-	-	-	-				
W Enhancement	2025	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	-	-	-	#DIV/0!	#DIV/0!	#DIV/0!			-	-	-	-				

Values shown above are illustrative only. The Dedicated Facility Project revenue requirement grid(s) shown above reflect the revenue requirements associated with a directly assigned transmission charge. The revenue requirement associated with this project in any given year is included on line 146 of Attachment H-2A ("the Gross Revenue Requirement") of BGE's formula rate model. This same revenue requirement is in turn credited on line 153 of Attachment H-2A ("Revenue Credits") such that this directly assigned transmission charge has no impact on Attachment H-2A, line 155 ("Net Revenue Requirement"). In this way BGE's wholesale transmission customers are insulated from any revenue requirement effect from the Dedicated Facility Project.

To accommodate varying in-service dates for different phases of these projects, it may be necessary to perform the above calculations by vintage.

The Dedicated Facility Project: Abandonment revenue requirement grid(s) shown above reflect the revenue requirements associated with the abandonment costs regulatory asset as it pertains to the directly assigned transmission charge. The revenue requirement associated with these abandonment costs in any given year is included on line 152 of Attachment H-2A (the Gross Revenue Requirement) of BGE's formula rate model. This same revenue requirement is in turn credited on line 159 of Attachment H-2A (Revenue Credits) such that the abandonment costs related to this directly assigned transmission charge has no impact on Attachment H-2A, line 161 ("Net Revenue Requirement"). In this way BGE's wholesale transmission customers are insulated from any revenue requirement effect associated with abandonment costs related to the directly assigned facility charge, should such abandonment costs ever arise.

Revenue requirements associated with abandoned plant will be billed to the zones that would have borne cost responsibility if the underlying assets had been placed in service, in accordance with existing PJM cost assignment policies.

Baltimore Gas and Electric Company

Attachment 8 - Company Exhibit - Securitization Workpaper

Line #

100	Long Term Interest		
	Less LTD Interest on Securitization Bonds		0

111	Capitalization		
	Less LTD on Securitization Bonds		0

Calculation of the above Securitization  
Adjustments



Attachment 9

Rate Base  
Worksheet

Baltimore Gas  
and Electric

(Note G)		Gross Plant In Service			Accumulated Depreciation			Accumulated Amortization		Net Plant In Service		
Line No	Month	Transmission	General & Intangible	Common	Transmiss ion	General	Common	Intangible	Common	Transmission	General & Intangible	Common
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
	Attachment H-2A, Line No:	19	23	24	30	31	12	10	11			
		204-207.58.g minus 204- 207.57.g. Projected monthly balances that are the amounts expected to be included in 204- 207.58.g for end of year and records for other months (Note E)	204-207.99.g plus 204- 207.5g, minus 204-207.98.g for end of year, records for other months	Electric Only, Form No 1, page 356 for end of year, records for other months	Monthly balances that are expected to be included in 219.25.c for end of year and records for other months (Note E)	219.28.c for end of year, records for other months	Electric Only, Form No 1, page 356 for end of year, records for other months	200- 201.21.c for end of year, records for other months	Electric Only, Form No 1, page 356 for end of year, records for other months	Col. (b) - (e)	Col. (c) - Col. (f) - Col. (h)	Col. (d) - Col. (g) - Col. (i)
1	December Prior Year Actual	-	-	-	-	-	-	-	-	-	-	-
2	January	-	-	-	-	-	-	-	-	-	-	-
3	February	-	-	-	-	-	-	-	-	-	-	-
4	March											



Line No	Month	CWIP	PHFU	Materials & Supplies	Stores Expense	Undistribu ted	Prepayments	Unamortize d Regulatory Asset	Unamortize d Abandoned Plant	Account No. 282	Account No. 283	Account No. 190	Account No. 255
										Accumulated	Accumulated	Accumulat	Accumula
										Deferred	Deferred	ed	ted
										Income Taxes (Note C)	Income Taxes (Note C)	Income Taxes (Note C)	Deferred Investmen t Credit
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)		
Attachment H-2A, Line No:	44b	28	50	47	45		44(a)						
			227. 8. c + 227.5.c (see Att H- 2A Note U) for end of year, 214 for end of year, records for other months	(227.16.c * Labor Ratio) for end of year, records for other months									
		(Note B)			(Note F)	(Note A)	(Note H)	Attachment 1	Attachment 1	Attachmen t 1	Attachme nt 1		
17	December Prior Year Actual	-			#DIV/0!		#DIV/0!						
18	January				#DIV/0!								
19	February				#DIV/0!								
20	March				#DIV/0!								
21	April				#DIV/0!								
22	May				#DIV/0!								
23	June				#DIV/0!								
24	July				#DIV/0!								

25 August					#DIV/0!			
26 September					#DIV/0!			
27 October					#DIV/0!			
28 November					#DIV/0!			
29 December					#DIV/0!			
30 Average of the 13 Monthly Balances (Note D)	-	-	-	-	#DIV/0!	-	#DIV/0!	

- Notes:
- A Recovery of regulatory asset or any associated amortization expenses is limited to any regulatory assets authorized by FERC.
  - B Includes only CWIP authorized by the Commission for inclusion in rate base.
  - C ADIT and Accumulated Deferred Income Tax Credits are computed using the average of non-prorated ADIT balances for the beginning of the year and end of the year balances plus the prorated balance.
  - D Calculate using 13 month average balance, except ADIT.
  - E Projected balances are for the calendar year the revenue under this formula begins to be charged.
  - F From Attachment 5 for the end of year balance and records for other months.
  - G In the true-up calculation, actual monthly balance records are used for plant and in the projected calculation, projected monthly balances are used for plant.
  - H Recovery of abandoned plant is limited to any abandoned plant recovery authorized by FERC.

**Rate Base Worksheet - Gross Plant in Service and Accumulated Depreciation (Less Asset Retirement Obligations)**

**(Note A)**

Gross Plant In Service	Asset Retirement Obligations	Gross Plant in Service Less Asset Retirement Obligations
------------------------	------------------------------	--

Month

**(a)**

### al Plant in Service

## Transmission

## General & Intangible

**Distribution Specific Software**

## Transmission Specific Software

**Commo**  
**n**

**Total**

## Transmission

## General & Intangible

**Distribution  
Specification  
Software**

# u Transm ssion c Specifi r Softwa e

ii  
c  
r Common  
n

Total

## 1. Introduction

Gener  
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**Specif**  
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19

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23

23

204-  
207.57.g  
. + 204- 204-  
207.74.g 207.57.g  
. + 204-  
207.83.g Monthly  
. + 204- balance  
207.98.g s that  
- are the  
Monthly amounts  
balance expected  
c s that d to be  
are the included  
o amounts in 204-  
e expected 207.57.g  
r d to be for end  
r included of year  
in 204- and  
s 207.57.g records  
er . + 204- for other  
s 207.74.g months  
. + 204-

	204- 207.58.g					. + 204- 207.74.g	204- 207.57.g
	.					. + 204-	.
	Monthly balance s that are the amounts expecte d to be	204- 207.99.g			Electric	s that	Monthly balance s that are the amounts expecte d to be
p204-207.104.g.	included	207.99.g			Only,	are the	included
Monthly balances	in 204-	. plus	Distributi	Transmi	Form No	amounts	in 204-
that are the	207.58.g	204-	on	ssion	1, page	expecte	207.57.g
amounts expected	for end	207.5.g.	specific	specific	356 for	d to be	for end
to be included in	of year	for end	software	software	end of	included	of year
204-207.104.g for	and	of year,	recorde	recorde	year,	in 204-	and
for end of year and	records	records	d in	d in	records	207.57.g	records
records for other	for other	for other	Account	Account	for other	. + 204-	for other
months	months	months	303	303	months	207.74.g	months
						. + 204-	

Account 303	Account 303	for other months	Col. (b) - Col. (h)	Col. (c) - Col. (i)	Col. (d) - Col. (j)	Col. (e) - Col. (k)	Col. (f) - Col. (l)	Col. (g) - Col. (m)
-------------	-------------	------------------	---------------------	---------------------	---------------------	---------------------	---------------------	---------------------

207.83.g  
. + 204-  
207.98.g  
. for  
end of  
year and  
records  
for other  
months

1 December Prior Year Actual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 January															
3 February															
4 March															
5 April															
6 May															
7 June															
8 July															
9 August															
10 September															
1 October															
1 November															



1  
7 February

1  
8 March

1  
9 April

2  
0 May

2  
1 June

2  
2 July

2  
3 August

2  
4 September

2  
5 October

2  
6 November

2  
7 December

2  
8      Average of the 13 Monthly  
Balances -

-      -      -      -      -      -      -      -      -      -      -      -      -      -      -      -

(Note A)

Accumulated Depreciation & Amortization Less Asset Retirement Obligations

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Month

Total Plant in      Intangib      Distribu      Transmi      Commo      Commo  
Service      General      le      tion      ssion      n      n  
Transmi      Depreci      Amortiz      Specific      Specific      Depreci      Amortiz  
ssion      ation      ation      Software      Software      ation      ation  
e      e

o

		Amortiz		Amortiz				
		ation		ation				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Attachment H-2A, Line No:	9	30	31	32		30	12	11
	Col. (b) - Col. (j)	Col. (c) - Col. (k)	Col. (d) - Col. (l)	Col. (e) - Col. (m)	Col. (f) - Col. (n)	Col. (g) - Col. (o)	Col. (h) - Col. (p)	Col. (i) - Col. (q)
2 9 December Prior Year Actual	-	-	-	-	-	-	-	-
3 0 January	-	-	-	-	-	-	-	-
3 1 February	-	-	-	-	-	-	-	-
3 2 March	-	-	-	-	-	-	-	-
3 3 April	-	-	-	-	-	-	-	-
3 4 May	-	-	-	-	-	-	-	-
3 5 June	-	-	-	-	-	-	-	-
3 6 July	-	-	-	-	-	-	-	-
3 7 August	-	-	-	-	-	-	-	-
3 8 September	-	-	-	-	-	-	-	-
3 9 October	-	-	-	-	-	-	-	-
4 November								

0		-	-	-	-	-	-	-	-
4									
1	December	-	-	-	-	-	-	-	-
4	Average of the 13 Monthly								
2	Balances -	-	-	-	-	-	-	-	-

N  
ot  
e

In the true-up calculation, actual monthly balance records are used for plant and in the projected calculation, projected monthly balances are used for A plant.

Baltimore Gas and Electric

Attachment 10 - Merger Costs

	(a)	(b)	(c)	(d)	(...)	(x)
O&M Cost To Achieve						
FERC Account		Total	Allocation to Trans.			Total
1	Transmission O&M		100.00%			\$ -
2	A&G		#DIV/0!			#DIV/0!
3						\$ -
4	Total	\$ -				#DIV/0!
5						
6 Depreciation & Amortization Expense Cost To Achieve						
FERC Account		Total	Allocation to Trans.			Total
8	General Plant	-	#DIV/0!			#DIV/0!
9	Intangible Plant	-	#DIV/0!			#DIV/0!
10	Common Plant	-	#DIV/0!			#DIV/0!
11	Total	\$ -				#DIV/0!
Capital Cost To Achieve included in Plant		General	Intangible	Common		
Gross Plant						Total
12	December Prior Year					\$ -
13	January					\$ -

14 February				\$	-
15 March				\$	-
16 April				\$	-
17 May				\$	-
18 June				\$	-
19 July				\$	-
20 August				\$	-
21 September				\$	-
22 October				\$	-
23 November				\$	-
24 December				\$	-
25 Average	#DIV/0!	#DIV/0!	#DIV/0!		-

Accumulated Depreciation	General	Intangible	Common		Total
26 December Prior Year				\$	-
27 January				\$	-
28 February				\$	-
29 March				\$	-
30 April				\$	-
31 May				\$	-
32 June				\$	-

33 July					\$	-
34 August					\$	-
35 September					\$	-
36 October					\$	-
37 November					\$	-
38 December					\$	-
39 Average	#DIV/0!	#DIV/0!	#DIV/0!			-

Baltimore Gas and Electric

Attachment 10 - Merger Costs

(a)	(b)	(c)	(d)	(...)	(x)
Net Plant = Gross Plant Minus Accumulated Depreciation from above	General	Intangible	Common		Total
40 December Prior Year	-	-	-	-	\$ -
41 January	-	-	-	-	\$ -
42 February	-	-	-	-	\$ -
43 March	-	-	-	-	\$ -
44 April	-	-	-	-	\$ -
45 May	-	-	-	-	\$ -
46 June	-	-	-	-	\$ -
47 July	-	-	-	-	\$ -
48 August	-	-	-	-	\$ -

49 September	-	-	-	-	\$	-
50 October	-	-	-	-	\$	-
51 November	-	-	-	-	\$	-
52 December	-	-	-	-	\$	-
53 Average	-	-	-	-		-

Depreciation	General	Intangible	Common		Total
54 January	-	-	-	\$	-
55 February	-	-	-	\$	-
56 March	-	-	-	\$	-
57 April	-	-	-	\$	-
58 May	-	-	-	\$	-
59 June	-	-	-	\$	-
60 July	-	-	-	\$	-
61 August	-	-	-	\$	-
62 September	-	-	-	\$	-
63 October	-	-	-	\$	-
64 November	-	-	-	\$	-
65 December	-	-	-	\$	-
66 Total	-	-	-	-	\$ -

**Capital Cost To Achieve included in Total Plant in Service**

67 December Prior Year

68 January

69 February

70 March

71 April

72 May

73 June

74 July

75 August

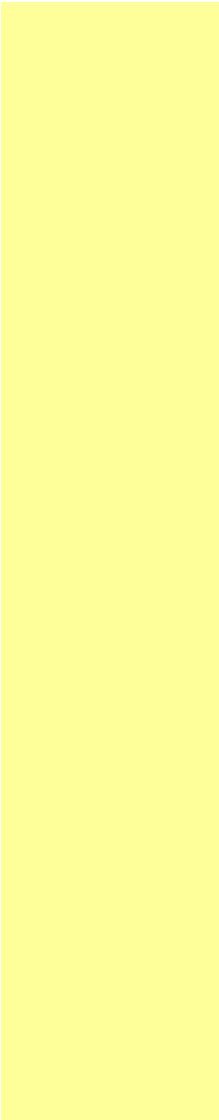
76 September

77 October

78 November

79 December

80 Average



**Baltimore Gas and Electric**  
**Attachment 11 - Depreciation\* and Amortization Rates**

TRANSMISSION PLANT

<b>Account</b>	<b>Account Description</b>	<b>Deprec. Rate (%)</b>
350.20	LAND RIGHTS	1.19
352.00	STRUCTURES AND IMPROVEMENTS	2.10
353.00	STATION EQUIPMENT	2.81
354.00	TOWERS AND FIXTURES	3.83
355.00	POLES AND FIXTURES	3.85
356.00	OVERHEAD CONDUCTORS AND DEVICES	3.90
357.00	UNDERGROUND CONDUIT	1.90
358.00	UNDERGROUND CONDUCTORS AND DEVICES	2.20
359.00	ROADS AND TRAILS	1.72

GENERAL PLANT - ELECTRIC

<b>Account</b>	<b>Account Description</b>	<b>Deprec. Rate (%)</b>
390.00	STRUCTURES AND IMPROVEMENTS	4.96
391.10	OFFICE FURNITURE	2.93
391.20	OFFICE EQUIPMENT	8.99
391.33	PERSONAL COMPUTERS	20.52
393.00	STORES EQUIPMENT	6.57
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	5.24
395.00	LABORATORY EQUIPMENT	0.01
397.00	COMMUNICATION EQUIPMENT	6.56
397.64	COMMUNICATION EQUIPMENT – DRI	10.60
398.00	MISCELLANEOUS EQUIPMENT	4.62

GENERAL PLANT - COMMON (ELECTRIC & GAS)

<b>Account</b>	<b>Account Description</b>	<b>Deprec. Rate (%)</b>
390.00	STRUCTURES AND IMPROVEMENTS	2.57
391.10	OFFICE FURNITURE	5.36
391.20	OFFICE EQUIPMENT	7.23
391.33	COMPUTER EQUIPMENT – OTHER	18.90
391.36	COMPUTER HARDWARE WITH SMART GRID	8.47
392.10	AUTOMOBILES	9.57
392.20	LIGHT TRUCKS UNDER 33,000	8.20
392.30	HEAVY TRUCKS 33,000 AND OVER	6.07
392.40	TRACTORS	5.04
392.60	TRAILERS	4.43
392.70	PRELEASED VEHICLES	17.45
393.00	STORES EQUIPMENT	8.38
394.10	PORTABLE TOOLS	4.44
394.20	SHOP AND GARAGE EQUIPMENT	5.09
394.30	CNG FUELING STATIONS	7.98
395.00	LABORATORY EQUIPMENT	3.78
396.00	POWER OPERATED EQUIPMENT	6.35
397.10	COMMUNICATION EQUIPMENT - OVERHEAD	5.32
397.20	COMMUNICATION EQUIPMENT - UNDERGROUND	5.19
397.30	COMMUNICATION EQUIPMENT - OTHER	4.97
397.60	COMMUNICATION EQUIPMENT - SMART GRID	12.15

398.00

MISCELLANEOUS EQUIPMENT

4.68

INTANGIBLE PLANT

Account	Account Description	Amort. Rate (%)
302	Franchises and Consents	
303	Miscellaneous Intangible Plant	
	2-year plant	50.00
	3-year plant	33.33
	4-year plant	25.00
	5-year plant	20.00
	6-year plant	16.67
	7-year plant	14.29
	8-year plant	12.50
	9-year plant	11.11
	10-year plant	10.00
	11-year plant	9.09
	12-year plant	8.33
	13-year plant	7.69
	14-year plant	7.14
	15-year plant	6.67

Notes:   \*Within five years of the effective date of the Settlement in Docket No ER19-5 et al, and at least every five years thereafter, BGE will file an FPA Section 205 rate proceeding to revise its depreciation rates (unless the company has otherwise submitted an FPA Section 205 rate filing that addresses its depreciation rates in the prior five years).

Depreciation rates as approved by FERC in Docket No. ER21-98.  
Amortization rates as approved by FERC in Docket No. ER21-214.