May 31, 2013

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

RE: Commonwealth Edison Co., Docket No. ER13-1609-000
Revisions to Distribution Loss Factor Charge

Dear Ms. Bose:

Pursuant to Sections 205 and 219 of the Federal Power Act (“FPA”), and Part 35 of the Commission’s regulations, 18 C.F.R. Part 35, Commonwealth Edison Company and Commonwealth Edison Company of Indiana (“ComEd”), submit for filing a revised Attachment H-13 (Network Integration Transmission Service for the ComEd Zone) of the PJM Interconnection, L.L.C. (“PJM”) Open Access Transmission Tariff (“OATT”). ComEd proposes to revise Attachment H-13 to remove the Distribution Loss Factor Charges (“DLFs”) assessed to generators connected to the ComEd distribution system. As explained further below, this is consistent with the treatment of Wholesale Distribution Charges, as approved by the Commission in Docket No. ER10-16. These revisions do not affect the charges that will continue to be assessed to load-serving customers who take wholesale transmission service over the ComEd distribution system. In order to promote the development of distribution-level generation, and consistent with Commission policy permitting early effectiveness of rate filings that reduce charges to customers, ComEd submits that good cause exists to waive the sixty day notice requirement and permit the removal of charges to become effective as June 1, 2013.

2 Pursuant to Order No. 714, this filing is submitted by PJM Interconnection, L.L.C. (“PJM”) on behalf of ComEd 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 in order to retain administrative control over the PJM Tariff. Thus, ComEd has requested that PJM submit this tariff revision in the eTariff system as part of PJM’s electronic Intra PJM Tariff.
3 Letter Order, Docket No. ER10-16 (Nov. 30, 2009) (approving the removal of Wholesale Distribution Charges for generators connected to the ComEd distribution system).
I. Identification of Applicant

ComEd, an Illinois corporation, is an operating subsidiary of Exelon Corporation, a Pennsylvania corporation. ComEd maintains more than 91,000 miles of overhead and underground transmission and distribution facilities in northern Illinois, as well as transmission facilities in Northern Indiana owned by its subsidiary Commonwealth Edison Company of Indiana, and provides delivered electric power to more than 3.8 million customers. ComEd does not own any generation facilities. ComEd transferred operational control over its transmission facilities to PJM Interconnection, LLC (“PJM”) on May 1, 2004. ComEd’s retail electric service is regulated by the Illinois Commerce Commission (“ICC”), while PJM’s provision of transmission service over ComEd’s transmission facilities and its sales for resale of electric energy in interstate commerce are regulated by this Commission.

II. Persons to Whom Correspondence Should be Addressed

<table>
<thead>
<tr>
<th>Name</th>
<th>Title/Role</th>
<th>Address</th>
<th>Phone Numbers</th>
<th>Email Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stan Berman</td>
<td>Associate General Counsel</td>
<td>Sidley Austin LLP</td>
<td>(206) 262-7681 (P)</td>
<td><a href="mailto:sbberman@sidley.com">sbberman@sidley.com</a></td>
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<td>701 Fifth Avenue, Suite 4200</td>
<td>(415) 772-7400 (F)</td>
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<td>Seattle, WA 98104</td>
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<tr>
<td>Heather Curlee</td>
<td>Associate General Counsel</td>
<td>Sidley Austin LLP</td>
<td>(202) 736-8838 (P)</td>
<td><a href="mailto:hcurlee@sidley.com">hcurlee@sidley.com</a></td>
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<td>1501 K Street NW</td>
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<td>Washington, DC 20005</td>
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<tr>
<td>Eugene Bernstein</td>
<td>Director</td>
<td>Exelon Business Services Company</td>
<td></td>
<td><a href="mailto:eugene.bernstein@exeloncorp.com">eugene.bernstein@exeloncorp.com</a></td>
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<td>10 S. Dearborn St., 35th Fl.</td>
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<td>Chicago, IL 60603</td>
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<tr>
<td>Christopher A. Wilson</td>
<td>Director</td>
<td>Exelon Corporation</td>
<td></td>
<td><a href="mailto:FERCe-filing@exeloncorp.com">FERCe-filing@exeloncorp.com</a></td>
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<td>101 Constitution Ave. Suite 400 E</td>
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III. Background and Statement of Nature, Reasons and Basis for Filing

The Commission has previously accepted the charges assessed by ComEd to wholesale customers that use ComEd’s distribution system in order to transmit energy to and from the PJM transmission system. In 2009, the Commission approved ComEd’s request to remove the

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4 See, e.g., Letter Order, Docket No. ER07-1102 (Nov. 27, 2007) (instructing ComEd to file the WDC and DLF charges as part of its Attachment H-13); Commonwealth Edison Co., 123 FERC ¶ 61,122 (21008) (accepting the
Wholesale Distribution Charges for generators connected to the ComEd distribution system.\(^5\) As ComEd explained, studies had demonstrated that reverse flows from distribution level generators may benefit ComEd’s system by reducing congestion and line loading in some conditions.\(^6\) While ComEd removed the Wholesale Distribution Charge, ComEd retained the DLF charge because it was appropriate to make generators responsible for the losses that they were creating.\(^7\) As ComEd explained, this approach “recognizes the benefit that is frequently provided by such generation, but holds others harmless in those instances where the generator imposes a cost on the system.”\(^8\)

Since ComEd made its filing in 2009, ComEd has seen a significant increase in the development of distribution level generation requesting participation in the wholesale market, including renewable energy facilities, and recognizes the public policy value that can be achieved through the continued development of this generation. From an engineering perspective, while certain distribution level generators increase flows and thus increase losses on the system,\(^9\) ComEd recognizes that many distribution level generators do not increase flows on the system, and have no adverse impact on losses on the ComEd system. Consistent with the approach taken in its 2009 filing, ComEd wishes to continue to promote the public policy goals promoted by distribution level generators, and recognize the frequent situation where there is no adverse loss effect, and thus proposes to remove the DLF charge for generators connected at the distribution level.

Accordingly, ComEd proposes to revise Attachment H-13 to remove the DLF charges for generators connected at the distribution level. The public policy and engineering rationales that underly this revision do not extend to load-serving entities. In particular, load serving entities by their nature almost always increase electric flows, and thus increase losses. Thus ComEd has determined it is appropriate to distinguish load-serving entities from generators when assessing DLFs.\(^10\) While distribution level generators will not be subject to any broadly applicable WDC or DLF charges, ComEd will continue to assess charges to distribution level generators for interconnection costs or other incremental costs associated with the service. After the effective

\(^6\)See Commonwealth Edison Submits Seventh Revised Sheet, Docket No. ER10-16 at 3 (Oct. 1, 2009).
\(^7\)Id. at 4.
\(^8\)Id.
\(^10\)This is consistent with the approach taken by ComEd in removing the Wholesale Distribution Charges for generators and continuing to assess such charges to load-serving entities. See Commonwealth Edison Submits Seventh Revised Sheet, Docket No. ER10-16 at 3 (Oct. 1, 2009).
date, ComEd’s proposed revisions to the calculation of the DLFs will reduce the DLF for one of its customers, Winnebago, to zero, as Winnebago has been assessed a charge due to the actual losses imposed on the ComEd system.\footnote{As of June 1, 2013, ComEd has removed the DLF from the calculations of Winnebago’s energy deliveries. Should the Commission reject this filing, ComEd will reinstitute the DLF calculation.} Going forward, ComEd will not assess DLF charges to generators connecting to the ComEd distribution system and transmitting energy to the PJM market.

IV. \textbf{Compliance with Commission Requirements}

A. \textbf{List of Documents Submitted}

ComEd submits this filing through PJM’s e-tariff system, and has included the following documents to this filing:

1. This transmittal letter;
2. Marked Tariff Sheets (Attachment A);
3. Clean Tariff Sheets (Attachment B).

B. \textbf{Proposed Effective Date}

Pursuant to Section 35.11 of the Commission’s regulations, ComEd respectfully requests waiver of the sixty day notice requirement and an effective date of June 1, 2013.

The Commission will permit waiver of the sixty day notice requirement for good cause.\footnote{See, e.g., Prior Notice and Filing Requirements Under Part II of the Federal Power Act, 64 FERC ¶ 61,139 (1993); Central Hudson Gas & Elec. Corp., 60 FERC ¶ 61,106 (1992).} Through this filing, ComEd is encouraging the development of distribution level generation, including solar and wind facilities, and is removing the charge currently being assessed to a generator. In order to promote these important public policy goals, and consistent with Commission policy permitting an early effective date for rate reductions to customers, good cause exists to grant waiver of the sixty day notice requirement.

C. \textbf{Designation}

The revisions are included as part of ComEd’s Attachment H-13 (Network Integration Transmission Service for the ComEd Zone).
D. Section 205 Compliance Requirements

1. Names and Addresses of Person to Whom a Copy of this Filing has been Mailed

Pursuant to Section 35.2(d) of the Commission’s regulations, ComEd has served a copy of this filing on representatives for PJM, the ICC, and Winnebago Energy Center. Copies of this filing are also available for inspection at ComEd’s office. ComEd has also served a copy of this filing on all PJM members by requesting PJM to post this filing electronically, and requests waiver of the requirement to post by mailing paper copies to PJM members.

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,\(^\text{13}\) PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: \texttt{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\(^\text{14}\) alerting them that this filing has been made by PJM and is available by following such link. PJM also serves the parties listed on the Commission’s official service list for this docket. If the document is not immediately available by using the referenced link, the document will be 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: \texttt{http://www.ferc.gov/docs-filing/elibrary.asp} in accordance with the Commission’s regulations and Order No. 714.

2. Description of the Filing

A description of the filing is set forth above.

3. Statement of the Reasons for the Submission

This transmittal letter and the attachments explain the reasons for the filing.

4. Requisite Agreement

No agreement is required by contract for the filing of proposed changes.

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\(^\text{13}\) \textit{See} 18 C.F.R. §§ 35.2(e) and 385.2010(f)(3).

\(^\text{14}\) PJM already maintains, updates, and regularly uses email lists for all PJM members and affected state commissions.
5. Statement Regarding Inclusion of Any Expense of Costs in Cost of Service Statements that Have Been Alleged or Adjudged Illegal, Duplicative, or Unnecessary Costs that are Demonstrably the Product of Discriminatory Employment Practices

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) of the Commission’s regulations.

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

This Rate Schedule does not affect ComEd’s cost of service or rate design. Applicants believe that they have provided sufficient information for the Commission to determine the reasonableness of the proposed changes. To the extent that this filing requires waivers of Section 35.13 of the Commission’s regulations, Applicants respectfully request such waivers, including waivers of Section 35.13(c), (d), (e), and (h) of the Commission’s regulations, 18 C.F.R. §§ 35.13(c), (d), (e), and (h). This filing, and the accompanying attachments, provides ample support for the Commission to accept for filing the Service Agreement. To the extent that this filing fails to contain any information otherwise required for technical compliance with the Commission’s regulations, Applicants respectfully request that compliance with such regulations be waived.
V. Conclusion

WHEREFORE, for the foregoing ComEd respectfully requests the Commission accept the revisions to the DLF, effective June 1, 2013.

Very truly yours,

/s/ Heather Curlee
Heather Curlee
Sidley Austin LLP
1501 K Street NW
Washington, DC 20005
(202) 736-8838
hcurlee@sidley.com

/s/ Eugene Bernstein
Eugene Bernstein
Assistant General Counsel
Exelon Business Services Company
10 S. Dearborn St., 49th Fl.
Chicago, IL 60603
(312) 394-7162 (P)
eugene.bernstein@exeloncorp.com
Certificate of Service

In accordance with 18 C.F.R. § 385.2010(f) (2008), I herby certify that I have, on this day, served a copy of the foregoing upon a representative for the Illinois Commerce Commission, PJM, and Winnebago Energy Center.

Dated this thirty-first day of May, 2013.

/s/ Heather Curlee
Heather Curlee
Sidley Austin LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8838
Attachment A

Revisions to Section(s) of the PJM Open Access Transmission Tariff

(Marked / Redline Format)
ATTACHMENT H-13

Annual Transmission Rates -- Commonwealth Edison Company
for Network Integration Transmission Service

1. The annual transmission revenue requirement and the gross rate for Network Integration Transmission Service are equal to the results of the formula shown in Attachment H-13A, posted on the PJM website, which reflects the transmission facilities of Commonwealth Edison Company (“ComEd”) under the operational control of PJM. The rate determined pursuant to Attachment H-13A shall be implemented pursuant to the Formula Rate Implementation Protocols set forth in Attachment H-13B. Service utilizing other facilities will be provided at rates determined on a case-by-case basis.

2. On a monthly basis, revenue credits shall be calculated based on the sum of ComEd’s share of revenues collected during the month from: (i) the PJM Border Rate under Schedule 7; (ii) Network Integration Transmission Service to Non-Zone Network Load under Attachment H-A; (iii) Seams Elimination Charge/Cost Adjustment/Assignment (“SECA”) revenues allocable to ComEd under the Tariff; and (iv) any Point-To-Point Transmission Service where the Point of Receipt and the Point of Delivery are both internal to the ComEd Zone. On this basis, the sum of these revenues will appear as a reduction to the gross monthly rate stated above on a Network Customer’s bill in that month for service under this attachment.

3. Within the ComEd Zone, a Network Customer’s peak load shall include a transmission loss percentage of 1.6% applied to the measured load as well as any distribution losses as reflected in applicable state tariffs and/or service agreements that contain specific distribution loss factors for said Network Customer.

4. The rate and revenue requirement in paragraph 1 of this attachment shall be effective until amended by the Transmission Owner(s) within the Zone or modified by the Commission.

5. In addition to the rate set forth in paragraph 1 of this attachment, the Network Customer purchasing Network Integration Transmission Service shall pay for transmission congestion charges, in accordance with the provisions of the Tariff, and any amounts necessary to reimburse the Transmission Owners for any amounts payable by them as sales, excise, “Btu,” carbon, value-added or similar taxes (other than taxes based upon or measured by net income) with respect to the amounts payable pursuant to the Tariff.

6. In addition to the other rates set forth in this schedule customers, within the ComEd zone shall be charged for recovery of RTO start-up costs at the following rates, each computed to four decimal places:
Annual Rate - $/kW/year = $1,523,039, divided by the 1 CP demand for the ComEd zone for the prior calendar year;

Monthly Rate - $/kW/month = Annual Rate divided by 12;

Weekly Rate - $/kW/week = Annual Rate divided by 52;

Daily Rate - $/kW/day = Weekly Rate divided by 5.

In order to ensure that the charge does not result in either an over-recovery or under-recovery of ComEd’s start-up costs, PJM will institute an annual true-up mechanism in the month of May of each of the years 2008-2014. In May of each of those years, PJM will compare the amount collected under this charge for the previous 12 months with the target annual amount of $1,523,039 and calculate any credits or surcharges that would be needed to ensure that $1,523,039 is collected for each year. Any credit or surcharge will be assessed in the June bills for years 2005-2014, consistent with the above methodology.

7. An annual Fixed Charge Rate of 24% shall apply to the net distribution plant that is directly assigned to a customer taking wholesale distribution service over ComEd distribution facilities. The net distribution plant will be directly assigned to the customer based on the customer’s pro-rata share of the non-coincident peak loading of the distribution facilities necessary to provide the service. Generating units connected at the distribution level and requiring wholesale distribution service will not be assessed a charge based on application of the Fixed Charge Rate, but will be responsible for paying interconnection costs and other incremental costs determined for such customer.

8. In accordance with Paragraph 7 above, wholesale distribution service shall be provided to the customers identified below at the identified monthly/annual charge corresponding to such customer:

<table>
<thead>
<tr>
<th>Customer</th>
<th>Charge</th>
</tr>
</thead>
<tbody>
<tr>
<td>Town of Winnetka</td>
<td>$164,080/year</td>
</tr>
<tr>
<td>Town of Rock Falls</td>
<td>$166,082/year</td>
</tr>
<tr>
<td>City of Naperville</td>
<td>$58,540.79/month</td>
</tr>
<tr>
<td>City of St. Charles</td>
<td>$181,479/month</td>
</tr>
</tbody>
</table>

9. In accordance with Paragraph 3 above, the annual distribution loss factors identified below shall apply to wholesale distribution service provide to the identified customers:

<table>
<thead>
<tr>
<th>Customer</th>
<th>Annual Distribution Loss Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Winnebago Energy Center</td>
<td>2.520.00%</td>
</tr>
<tr>
<td>Town of Winnetka</td>
<td>0.30%</td>
</tr>
<tr>
<td>Town of Rock Falls</td>
<td>0.83%</td>
</tr>
<tr>
<td>The City of Geneva</td>
<td>2.20%</td>
</tr>
<tr>
<td>City of Naperville</td>
<td>0.09%</td>
</tr>
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<td>City of St. Charles</td>
<td>1.94%</td>
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</tbody>
</table>
10. In accordance with the settlement reached between ComEd and Geneva in Docket No. ER06-133, when Geneva operates its generating facility (“GGF”) on a behind the meter (“BTM”) basis pursuant to Section 1.3B of this OATT, Geneva will pay ComEd an annual charge of $1,075,000 ($89,583.33 per month) for wholesale distribution service. There will be no additional charge associated with operation of the GGF on a BTM basis to serve the entirety of Geneva’s load. When Geneva does not operate the GGF BTM, Geneva will pay ComEd an annual charge for wholesale distribution service of $1,255,000 ($104,583.33 per month). In addition, Geneva will pay ComEd a one-time fee of $256,920.00 for a new point of interconnection to the Delnor substation on ComEd’s distribution system.
Attachment B

Revisions to Section(s) of the PJM Open Access Transmission Tariff

(Clean Format)
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5. In addition to the rate set forth in paragraph 1 of this attachment, the Network Customer purchasing Network Integration Transmission Service shall pay for transmission congestion charges, in accordance with the provisions of the Tariff, and any amounts necessary to reimburse the Transmission Owners for any amounts payable by them as sales, excise, “Btu,” carbon, value-added or similar taxes (other than taxes based upon or measured by net income) with respect to the amounts payable pursuant to the Tariff.

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