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***Via Electronic Filing***

February 23, 2010

The Honorable Kimberly D. Bose  
Secretary, Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: *PJM Interconnection, L.L.C.*, Docket No. EL05-121-006;  
Response to Motion Contained in Answer**

Dear Ms. Bose:

In a February 19, 2010 “answer” to a motion by PJM Interconnection, L.L.C. (“PJM”) for an extension of time to submit information it was directed to file, Exelon Corporation (“Exelon”) made its own motion that PJM provide additional studies and file additional reports thereon.

Baltimore Gas and Electric Company (“BGE”) takes issue with Exelon’s claim (p. 3) that 345 kV facilities “are designed and used in the same manner by western PJM utilities as 500 kV transmission facilities are used in the east.” The record shows a PJM two tiered planning horizon of like-functioning facilities in PJM: 765 kV in the western PJM and 500 kV facilities in eastern PJM are in one tier, while 345 kV in western PJM and 230 kV facilities in eastern PJM are in the other tier. Ex. No. TOP-14. While a threshold of either 500 kV or 230 kV for a system-wide rate was considered to be equally just and reasonable, there was testimony that a threshold of 765 kV or 345 kV would be unduly discriminatory against eastern PJM rate zones.

Specifically, Transmission Owner Proponents witness Charles P. Matassa testified (Ex. No. TOP-10, p. 11, ll. 14 – 16) that “there is no one right answer to identifying facilities that make interregional transfer possible; however, I believe that the use of a 345 kV demarcation is not among the category of right answers, but is a distinctly wrong answer.”

Accordingly, any studies along the lines advocated by Exelon for 345 kV facilities would necessitate similar studies of 230 kV facilities. Also, any studies using a “distribution factor” analysis would have to include both peak and off-peak flows so as to show beneficiaries under different usage patterns.

Very truly yours,

/s/ Gary E. Guy  
Gary E. Guy

cc: All Parties

Document Content(s)

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