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JENNER & BLOCK LLP

AD18-7-000

ORIGINAL

March 30, 2018

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VIA COURIER

The Honorable James Richard Perry
Secretary of Energy
United States Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

RECEIVED BY THE
SECRETARY OF THE
COMMISSION
2018 APR -3 A 11:51

Re: FirstEnergy Solutions Corporation's Request for Emergency Order Pursuant to Federal Power Act Section 202(c)

Dear Secretary Perry:

Exelon Corporation ("Exelon") has received an application by FirstEnergy Solutions Corporation for an order pursuant to the emergency provisions of Section 202(c) of the Federal Power Act, 16 U.S.C. § 824a(c). The closure of FirstEnergy's three emissions-free nuclear plants will immediately erase the environmental benefits of more than 25 years of wind and solar development in the markets they serve. As the nation's largest producer of emissions-free energy, Exelon urges policymakers to prioritize reforms that fix widely acknowledged market rule flaws that unfairly disadvantage nuclear plants, which are an indispensable component of a resilient and secure electric grid and serve as economic engines for the communities they serve.

We note that PJM's response to the application suggests that traditional reliability analyses can be used to determine whether action by the Department is needed. See Letter from Vincent P. Duane to the Honorable James Richard Perry, March 30, 2018. However, both FERC and PJM have acknowledged that traditional reliability analyses do not encompass the resilience of supply. See *Grid Reliability and Resilience Pricing*, 162 FERC ¶ 61,012, at PP 22-24 (2018); Comments and Response of PJM Interconnection, L.L.C., FERC Docket No. AD18-7-000, at 4, 12-14 (March 9, 2018). Therefore, PJM's reliability evaluation is not dispositive of whether action is needed.

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Exelon reserves its rights to supplement its response under 10 C.F.R. § 205.374, and provide any other information relevant to the requested action.

Sincerely,



Matthew E. Price
Counsel for Exelon Corporation

cc: Bruce J. Walker, Assistant Secretary, DOE Office of Electricity Delivery & Energy Reliability

Patricia A. Hoffman, Principal Deputy Assistant Secretary, DOE Office of Electricity Delivery & Energy Reliability

FirstEnergy Solutions Corp.

Federal Energy Regulatory Commission

Delaware Public Service Commission

Illinois Commerce Commission

Indiana Utility Regulatory Commission

Kentucky Public Service Commission

Maryland Public Service Commission

Michigan Public Service Commission

State of New Jersey Board of Public Utilities

North Carolina Utilities Commission

Public Utilities Commission of Ohio

Pennsylvania Public Utilities Commission

Tennessee Public Utility Commissions

Commonwealth of Virginia State Corporation Commission

Public Service Commission of West Virginia

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New York Public Service Commission

Public Service Commission of the District of Columbia

PJM Interconnection

ReliabilityFirst Corp.

SERC Reliability Corporation

AES Warrior Run

Avon Lake

B L England

Beaver Valley

Birchwood Power

Braidwood Generation Station

Brandon Shores

Brunner Island

Byron Generating Station

Calvert Cliffs Nuclear Power Plant

Cardinal

Chalk Point

Chambers Cogeneration LP

Chesterfield

Cheswick Power Plant

Clover

Conemaugh

Conesville

Cooper

Covington Facility

CP Crane

Davis Besse

Dickerson

Donald C Cook

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Dover
Dresden Generating Station
East Bend
Edgecombe Genco
FirstEnergy Bruce Mansfield
FirstEnergy Fort Martin Power Station
FirstEnergy Harrison Power Station
FirstEnergy Pleasants Power Station
FirstEnergy W H Sammis
FirstEnergy Solutions Corp.
General James M Gavin
H L Spurlock
Herbert A Wagner
Homer City Generating Station
Indian River Generating Station
Ingredion Incorporated
J M Stuart
James River Genco
John E Amos
Joliet 9
Joliet 29
Keystone
Killen Station
Kincaid
LaSalle Generating Station
Limerick
Logan Generating Company
Longview Power Plant
Luke Mill

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Mecklenburg Power Station
Miami Fort
Mitchell (WV)
Morgantown Generating Plant
Mountaineer
Mt Storm
North Anna
Orrville
Oyster Creek
P H Glatfelter
P H Glatfelter Chillicothe Facility
Painesville
Peach Bottom
Perry
Powerton
PSEG Hope Creek Generating Station
PSEG Salem Generating Station
Quad Cities Generating Station
Radford Army Ammunition Plant
Rockport
Spruance Genco
Surry
TalenEnergy Montour
TalenEnergy Susquehanna
Tennessee Eastman Operations
Three Mile Island
University of Notre Dame
Virginia City Hybrid Energy Center
W H Zimmer

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Waukegan

Wausau Paper Middletown

Whitewater Valley

Will County

Yorktown

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