

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

Notice of Information Collections and)	Docket No. IC25-7-000
And Request for Comments)	
)	

COMMENTS OF EXELON CORPORATION

Exelon Corporation and its affiliates¹ (collectively, “Exelon”) appreciate the opportunity to comment in response to the above-captioned Notice of Information Collection (“NOIC”), which the Federal Energy Regulatory Commission (“the Commission”) issued on February 3, 2025, and published in the Federal Register on February 7, 2025. In the NOIC, the Commission is soliciting public comments on the requirements and information collection burden associated with Form Nos. 1, 1-F, and 3-Q. In summary, Exelon recommends that the filing requirements of Form No. 3-Q be eliminated. We have no objection to the renewal of Form No. 1.

Exelon and its more than 20,000 employees work each day to serve more than 10.7 million customers through six fully regulated transmission and distribution utilities. Exelon’s six utilities deliver electricity and natural gas to customers in Delaware, the District of Columbia, Illinois, Maryland, New Jersey and Pennsylvania. Exelon currently files large volumes of financial, operational, facility, and other information with the Commission and other federal and state agencies, including Internal Revenue Service (“IRS”), Securities and

¹ Atlantic City Electric Company (“ACE”), Baltimore Gas and Electric Company (“BGE”), Commonwealth Edison Company (“ComEd”), Delmarva Power and Light Company (“DPL”), PECO Energy Company (“PECO”), and Potomac Electric Power Company (“Pepco”).

Exchange Commission (“SEC”), and state utility commissions and regulatory agencies. These filings provide a detailed picture of company finances and operations.

Exelon was involved in the taskforce that wrote the comment letter submitted by the Edison Electric Institute (“EEI”). We support the conclusions that were reached in that comment letter and offer limited additional comments below.

Exelon files FERC Form Nos. 1 and 3-Qs for each of our utilities, ACE, BGE, ComEd, ComEd IN (ComEd’s Indiana subsidiary), Delmarva Power, PECO, and Pepco for a total of 21 Form No. 3-Qs annually. The compilation, verification, and reporting of the information that Exelon files on Form Nos. 1 and 3-Q, other FERC forms and filings, and filings with other agencies involve substantial work and costs. Substantial staff labor, computer software and hardware, and other resources are needed to provide this information, resulting in costs that are borne by utility jurisdictional customers,. Often these filings are due in short and overlapping time frames during accounting close and reporting periods, thus creating an additional burden on staff. As a result, Exelon is requesting that the Commission consider the limited value that Form No. 3-Q has in accomplishing the Commission’s oversight mission as explained below.

In the NOIC, comments are invited on (1) whether the information collections are necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility; (2) the accuracy of the agency’s estimates of the burden and cost of the collections of information, including the validity of the methodology and assumptions used; (3) ways to enhance the quality, utility, and clarity of the information collections; and (4) ways to minimize the burden of the collections of information on those who are to respond, including the use of automated collection techniques or other forms of information technology. Exelon offers the following comments on these matters.

Exelon fully supports the Commission's oversight of utility reporting entities for electric rate regulation, market oversight analysis, and financial audits. We believe this objective is met through the financial and operational data collected in the annual Form No. 1. The Form No. 1 is an important reference tool for Exelon's financial results and operations at the federal, state, and local level. Exelon utilizes the Form No. 1 to establish formula rates based on Commission Staff's Guidance on Formula Rate Updates, which require adjustments from the Form No. 1 account balances consistent with both Commission policies for certain costs and the individual requirements of the respective formula rates.

The Form No. 3-Q is not utilized internally or externally for supporting utility filings nor has Exelon been contacted by the Commission or jurisdictional customers about information within the Form No. 3-Q for any of the last three years. As a supplement to the Form No. 1, the Form No. 3-Q does not add value to the usefulness and transparency of the financial information on a quarterly basis while the burden on staff preparing the Form No. 3-Q filings is material and outweighs any perceived benefit. We do not support the continued requirement to file the Form No. 3-Q as there has not been a clear use for the information for many years.

Regarding providing ongoing quarterly oversight of Exelon and its subsidiaries, the Commission can utilize reports filed with SEC. The Form No. 10-Q includes a full set of financial statements along with Management's Discussion and Analysis, and other information. Additionally, Form No. 8-K is required to disclose material events typically within four days of the event. These reports must be filed with the SEC in a timely manner and provide a very efficient means for monitoring current financial information.

Exelon appreciates the opportunity to comment on the Commission's NOIC associated with Form No.1 and Form No. 3-Q. The Form No. 1 provides substantial

information for the Commission, jurisdictional customers, as well as other parties to use for evaluation. The Form No. 3-Q provides little or no incremental information that the Commission or jurisdictional customers find useful. Accordingly, we strongly encourage the Commission to eliminate the requirement for filing the Form No. 3-Q, given that it is costly to prepare and appears to be of very limited value.

Respectfully Submitted,

/s/ Rob Kleczynski

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