Pepco Holdings, Inc

PO Box 9239, Mail Stop 79NC22
Newark, DE 19714
(302) 454-4603
(302) 454-4034 Fax
gloria.godson@pepcoholdings.com

Gloria C. Godson
Vice President
Federal & PJM Regulatory Policy

September 8, 2011

Lauren Azar
US Department of Energy
Lauren.Azar@hq.doe.gov

Sent via email

Ms. Azar,

Pepco Holdings, Inc. (PHI), on its own behalf and on behalf of its affiliates Potomac Electric Power Company (Pepco), Atlantic City Electric Company (ACE), and Delmarva Power & Light Company (Delmarva) (collectively, the PHI Companies), are writing to express support for an effort that has come to our attention regarding a proposed delegation of authority from the Department of Energy (DOE) to the Federal Energy Regulatory Commission (FERC). The PHI Companies support the proposed initiative in which DOE would delegate to FERC its Energy Policy Act 2005 (EPAct 2005) authority to conduct congestion studies and to designate national interest electric transmission corridors (NIETCs) in areas experiencing electric energy transmission constraints or congestion.

The PHI Companies are transmission builders, owners and operators, as well as load serving entities. Pepco, Delmarva and Atlantic City are also each a state regulated transmission and distribution utility and active participants in PJM Interconnection. PHI and the PHI Companies have supported the DOE congestion study efforts and NIETC designations in the past and are supportive of current efforts to better streamline these processes. PHI believes that FERC is uniquely suited to conduct the work contemplated pursuant to the delegation proposal due to its extensive expertise in the areas of both transmission congestion and transmission infrastructure. Therefore, we recommend and support DOE's exercise of discretion to delegate to FERC, its EPAct 2005 authority to conduct congestion studies and to designate NIETCs in order to consolidate the dual aspects of federal siting in EPAct 2005 within one agency.

Thank you for your consideration and please contact the undersigned if you have any questions.

Sincerely,

Gloria C. Godson
Vice President, Federal & PJM Regulatory Policy