

BOSTON CONNECTICUT FLORIDA NEW JERSEY NEW YORK WASHINGTON, DC

NAJU R. LATHIA Attorney at Law

One Jefferson Road Parsippany, NJ 07054-2891 T: (973) 966-8082 F: (973) 206-5804 nlathia@daypitney.com

April 9, 2021

Via Electronic Mail¹

Aida Camacho-Welch Secretary of the Board New Jersey Board of Public Utilities 44 S. Clinton Avenue Trenton, NJ 08625 board.secretary@bpu.nj.gov

Re: I/M/O The Application of PSEG Nuclear, LLC and Exelon Generation Company,

LLC for the Zero Emission Certificate Program - Salem Unit 1 Docket No.

ER20080557

I/M/O The Application of PSEG Nuclear, LLC and Exelon Generation Company,

LLC for the Zero Emission Certificate Program - Salem Unit 2 Docket No.

ER20080558

Dear Secretary Camacho-Welch:

Pursuant to the Prehearing Order on Schedule, Outstanding Issues, and Evidentiary Hearing, Exelon Generation Company, LLC ("Exelon Generation") submits this letter to the Board of Public Utilities ("Board") in lieu of a Post-Hearing Reply Brief and adopts, as if set forth at length herein, all of the arguments made by PSEG Nuclear, LLC ("PSEG") in the above-captioned dockets.² Further, Exelon Generation respectfully reiterates its request that the Board approve the award of Zero Emission

¹ Pursuant to the March 19, 2020 Order issued by the Board of Public Utilities in Docket No. EO20030254, filing and service of this letter is made in electronic format only.

² As explained in the Applications filed by PSEG on October 1, 2020, and the Supplemental Information filed by Exelon Generation on the same day, certain types of proprietary market information cannot be shared between or among competitors. *See* Affidavit in Support of Confidentiality Request of Exelon Generation Company, LLC Regarding Confidential Treatment of Information Submitted in Support of Zero Emission Certificate Application – Salem Unit 1, dated September 20, 2020, by Kevin Garrido, Vice President Finance Nuclear. Accordingly, Exelon Generation expresses no opinion about any proprietary information used by PSEG to which it does not have access.

P DAY PITNEY LLP

Secretary Camacho-Welch March 26, 2021 Page 2

Certificates ("ZECs") to Salem Units 1 and 2 (the "Salem Units") without reducing the amount of the ZEC payment.³

Should you have any questions about the foregoing, please do not hesitate to contact Jeanne J. Dworetzky at jeanne.dworetzky@exeloncorp.com or (202) 637-0346.

Respectfully submitted,

/s/ Jeanne J. Dworetzky

Jeanne J. Dworetzky

(Admission Pro Hac Vice)

Assistant General Counsel Exelon Generation Company, LLC 101 Constitution Avenue, NW, Suite 400W Washington, DC 20001 T: (202) 637-0346

jeanne.dworetzky@exeloncorp.com

/s/ Naju R. Lathia

Naju R. Lathia

Day Pitney LLP One Jefferson Road Parsippany, NJ 07054 T: (973) 966-8082 nlathia@daypitney.com

Counsel to Exelon Generation Company, LLC

/s/ Alexander W. Judd

(Admission Pro Hac Vice)

Day Pitney LLP 242 Trumbull Street Hartford, CT 06103 T: (860) 275-0147 ajudd@daypitney.com

Counsel to Exelon Generation Company, LLC

Cc: Service List

³ Exelon Generation has a 42.59 percent ownership interest in the Salem Units, and PSEG has a 57.41 percent ownership interest in, and is the NRC-licensed operator of, the Salem Units. Under the Salem owners' agreement, the responsibility for determining whether to retire the Salem Units rests solely with PSEG.