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September 30, 2020

VIA ELECTRONIC FILING

Secretary Aida Camacho-Welch
Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
P.O. Box 350
Trenton, New Jersey 08625-0350

Re: **In the Matter of the Application of PSEG Nuclear, LLC and Exelon
Generation Company, LLC For the Zero Emission Certificate Program -
Salem Unit 1
Docket No. ER20080557**

**In the Matter of 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:

On behalf of Exelon Generation Company, LLC (“Exelon Generation”) please find enclosed a Motion to Amend Orders in the above-referenced matters, along with an accompanying Certification of Service.

Please do not hesitate to contact me if you have any questions or require additional information. Thank you for your attention to this matter.

Respectfully submitted,

/s/ Naju R. Lathia

Naju R. Lathia

Enclosure
cc: Service Lists

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

In the Matter of the Application of PSEG NUCLEAR,) **Docket No. ER20080557**
LLC and EXELON GENERATION COMPANY, LLC)
for the Zero Emission Certificate Program – Salem)
Unit 1)

In the Matter of the Application of PSEG NUCLEAR,) **Docket No. ER20080558**
LLC and EXELON GENERATION COMPANY, LLC)
for the Zero Emission Certificate Program – Salem)
Unit 2)

MOTION TO AMEND ORDERS

Exelon Generation Company, LLC (“Exelon Generation”), by undersigned counsel and pursuant to the regulations of the Board of Public Utilities (“Board”), N.J.A.C. § 14:1, requests that the Board amend its September 29, 2020 Orders Ruling on Motions to Intervene and Participate, Admission Pro Hac Vice, and Access to Confidential Information in the above-referenced proceedings (the “Orders”) to make certain corrections to the procedural history, as described below.

The Orders incorrectly state that PSEG Nuclear, LLC (“PSEG”) alone filed a brief in response to the PJM Power Providers Group Motion to Intervene and request for access to confidential information. In fact, that submission was jointly filed by PSEG Nuclear and Exelon Generation.¹ Accordingly, Exelon Generation respectfully requests

¹ The Brief in Opposition to the Motion to Intervene of PJM Power Providers Group, filed on September 25, 2020 in the above-referenced proceeding, clearly states on page 1 that PSEG and Exelon Generation are jointly filing the brief. For any avoidance of doubt, and as an administrative matter, Exelon Generation filed an updated signature page to that brief on September 28, 2020.

that the Orders be amended to reflect the joint authorship in the following locations in the Orders:

- Page 4: number 2 of the list of entities that filed objections should include Exelon Generation Company, LLC;
- Page 9: Exelon Generation Company, LLC should be added to references to PSEG Nuclear throughout the discussion; and
- Page 12: Exelon Generation Company, LLC should be added to the reference to PSEG Nuclear' s opposition brief.

Making the requested changes will ensure clarity and accuracy of the record in these proceedings. Therefore, Exelon Generation respectfully requests that the Board make the above changes to the Orders as expeditiously as possible.

Respectfully submitted,

/s/ Naju R. Lathia

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Dated: September 30, 2020

SERVICE LIST

IN THE MATTER OF THE APPLICATION OF PSEG NUCLEAR, LLC AND EXELON
GENERATION COMPANY, LLC FOR THE ZERO EMISSION CERTIFICATE PROGRAM -
SALEM UNIT 1
DOCKET NO. ER20080557

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IN THE MATTER OF THE APPLICATION OF PSEG NUCLEAR, LLC AND EXELON
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SALEM UNIT 2
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In the Matter of the Application of PSEG NUCLEAR,) **Docket No. ER20080558**
LLC and EXELON GENERATION COMPANY, LLC)
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Unit 2)

CERTIFICATION OF SERVICE

I, Naju R. Lathia, an attorney at law in the State of New Jersey, hereby certify as follows:

- 1) On September 30, 2020, I caused to be served via email a copy of the enclosed Notice of Motion to Amend Orders on the Secretary to the New Jersey Board of Public Utilities; and
- 2) On the same date, I also caused to be served by electronic mail a copy of the enclosed Notice of Motion to Amend Orders, on each party on the Service Lists.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

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By: /s/ Naju R. Lathia
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Dated: September 30, 2020