Welcome to your CDP Climate Change Questionnaire 2019

C0. Introduction

C0.1

(C0.1) Give a general description and introduction to your organization.

Exelon Corporation (NYSE: EXC) is a Fortune 100 energy company with the largest number of electricity and natural gas customers in the U.S. Exelon does business in 48 states, the District of Columbia and Canada, and had 2018 revenue of $36 billion. Exelon serves approximately 10 million customers in Delaware, the District of Columbia, Illinois, Maryland, New Jersey and Pennsylvania through its Atlantic City Electric, BGE, ComEd, Delmarva Power, PECO and Pepco subsidiaries. Exelon is one of the largest competitive U.S. power generators, with more than 32,000 megawatts of nuclear, gas, wind, solar and hydroelectric generating capacity comprising one of the nation's cleanest and lowest-cost power generation fleets. The company's Constellation business unit provides energy products and services to approximately 2 million residential, public sector and business customers, including more than two-thirds of the Fortune 100. Follow Exelon on Twitter @Exelon. The global scientific community has reached consensus on the profound implications of climate change and the significant consequences of inaction. Exelon recognizes that climate change will result in increased volatility in weather and electricity demand, and believes that a reliable and resilient electric grid requires fuel diversity and continued transmission and distribution investment. Exelon maintains the lowest owned generation fleet CO2 emission rate out of top 20 investor-owned companies and focuses on low-carbon solutions for customers. The company is also making substantial investments to ensure that the electric grid is more efficient and resilient for customers into the future.

This survey contains certain forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995 that are subject to risks and uncertainties. Factors that could cause actual results to differ materially from the forward-looking statements made by Exelon Corporation, Exelon Generation Company, LLC, Commonwealth Edison Company, PECO Energy Company, Baltimore Gas and Electric Company, Pepco Holdings LLC (PHI), Potomac Electric Power Company, Delmarva Power & Light Company, and Atlantic City Electric Company (Registrants) include those factors discussed herein, as well as the items discussed in:

(1) Exelon’s 2017 Annual Report on Form 10-K in (a) ITEM 1A. Risk Factors, (b) ITEM 7. Management’s Discussion and Analysis of Financial Condition and Results of Operations and (c) ITEM 8. Financial Statements and Supplementary Data: Note 23, Commitments and Contingencies;
(2) Exelon’s First Quarter 2018 Quarterly Report on Form 10-Q in (a) Part II, Other Information, ITEM 1A. Risk Factors; (b) Part 1, Financial Information, ITEM 2. Management’s Discussion and Analysis of Financial Condition and Results of Operations and (c) Part I, Financial Information, ITEM 1. Financial Statements: Note 17, Commitments and Contingencies; and
(3) Other factors discussed in filings with the SEC by the Registrants.
Readers are cautioned not to place undue reliance on these forward-looking statements, which apply only as of the date of this presentation. None of the Registrants undertakes any obligation to publicly release any revision to its forward-looking statements to reflect events or circumstances after the date of this presentation.

**C0.2**

(C0.2) State the start and end date of the year for which you are reporting data.

<table>
<thead>
<tr>
<th>Start date</th>
<th>End date</th>
<th>Indicate if you are providing emissions data for past reporting years</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 1, 2018</td>
<td>December 31, 2018</td>
<td>No</td>
</tr>
</tbody>
</table>

**C0.3**

(C0.3) Select the countries/regions for which you will be supplying data.
- Canada
- United States of America

**C0.4**

(C0.4) Select the currency used for all financial information disclosed throughout your response.
- USD
C0.5

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your consolidation approach to your Scope 1 and Scope 2 greenhouse gas inventory.

Equity share

C-EU0.7

(C-EU0.7) Which part of the electric utilities value chain does your organization operate in? Select all that apply.

Row 1

Electric utilities value chain
- Electricity generation
- Transmission
- Distribution

Other divisions
- Gas storage, transmission and distribution
- Smart grids / demand response
- Battery storage
- Micro grids

C-OG0.7

(C-OG0.7) Which part of the oil and gas value chain and other areas does your organization operate in?

Row 1

Oil and gas value chain
**C1. Governance**

**C1.1**

(C1.1) Is there board-level oversight of climate-related issues within your organization?

Yes

**C1.1a**

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

<table>
<thead>
<tr>
<th>Position of individual(s)</th>
<th>Please explain</th>
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<tbody>
<tr>
<td>Board-level committee</td>
<td>The Corporate Governance Committee of the Exelon Board is responsible for the oversight of Exelon’s environmental strategies and sustainability policies including climate change issues such as GHG mitigation and climate adaptation and resiliency. This Board Committee maintains this responsibility to ensure that there is ongoing communication on environmental issues (including the topic of climate change) at the highest levels of the company, with updates on program progress made at least annually. Because we are a provider of low carbon solutions for our customers and communities and we are the largest producer of zero carbon electricity company in the United States, many elements associated with our environmental strategies are key to our overall business strategy are also discussed on a more regular basis with the Board.</td>
</tr>
</tbody>
</table>
(C1.1b) Provide further details on the board’s oversight of climate-related issues.

<table>
<thead>
<tr>
<th>Frequency with which climate-related issues are a scheduled agenda item</th>
<th>Governance mechanisms into which climate-related issues are integrated</th>
<th>Please explain</th>
</tr>
</thead>
</table>
| Scheduled – some meetings | Reviewing and guiding strategy  
Reviewing and guiding major plans of action  
Reviewing and guiding risk management policies  
Reviewing and guiding annual budgets  
Reviewing and guiding business plans  
Setting performance objectives  
Monitoring implementation and performance of objectives  
Overseeing major capital expenditures, acquisitions and divestitures  
Monitoring and overseeing progress against goals and targets for addressing climate-related issues | Because we are a provider of low carbon solutions for our customers and communities and we are the largest producer of zero carbon electricity in the United States, many elements associated with our overall business strategy include elements associated with climate change issues such as preserving nuclear and modernizing our distribution utility systems. Emerging and potentially disruptive technologies, operational performance at our low carbon generation facilities, which maximizes zero carbon generation on the grid, as well as advocacy efforts to develop a market value for all clean generation technology in the markets where we operate, are other such topics regularly included in our Board discussions as to how they might relate to guiding our overall business strategy. Other climate related issues are also discussed as appropriate or at least annually as part of the Corporate Governance Committee and Generation Oversight Committee agendas. |
C1.2

(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.

<table>
<thead>
<tr>
<th>Name of the position(s) and/or committee(s)</th>
<th>Responsibility</th>
<th>Frequency of reporting to the board on climate-related issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Sustainability Officer (CSO)</td>
<td>Both assessing and managing climate-related risks and opportunities</td>
<td>Quarterly</td>
</tr>
</tbody>
</table>

C1.2a

(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).

Exelon's Senior Vice President of Corporate Strategy and Chief Innovation & Sustainability Officer (CISO), has direct responsibility for governance and oversight of Exelon's Climate Change Policy and associated GHG and climate change programs. These programs focus on GHG mitigation within our own operations, contributing to reducing overall emissions from the energy sector, and coordinating climate change adaptation and resiliency efforts. Heading up the Corporate Strategy, Innovation and Sustainability (CSIS) department, Exelon's CISO is also responsible for the overarching business strategy and long-term strategic plan for the organization. Responsibility for sustainability sits within this corporate strategy function to ensure that sustainability is incorporated in decision-making at the highest levels within the company. The CSIS department recognizes opportunities associated with climate change issues within the corporation, to include the development of new and emerging technologies, and maintaining a broad energy value chain perspective focused on creating value for our customers as we support a clean, reliable and affordable energy system today and in the future. Exelon's CISO presents business strategy materials at least annually to the Board of Directors, and is supported on the implementation and refinement of these programs by his management team, as well as the senior management of our operating companies, Exelon Generation, ComEd, PECO, BGE, PHI and Business Services Company (BSC).

Exelon's CISO presents performance associated with goals and targets of Key Performance Indicators, which include climate change related metrics, quarterly with the CEO and Executive Committee. Our CSIS department is also responsible for the aggregation of the GHG emissions of the corporation, which are monitored quarterly. Strategic analysis of long-term climate change risks associated with 2-degree scenario analysis are also conducted within this group, in coordination with other key areas of the company. Climate related issues are also incorporated as part of the Enterprise
Risk Management process (as it relates to business model impacts) and the ISO 14001 EMS process for site level physical impacts, similarly coordinated with CSIS’s work.

C1.3

(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?

Yes

C1.3a

(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).

Who is entitled to benefit from these incentives?

Corporate executive team

Types of incentives

Monetary reward

Activity incentivized

Other, please specify
  Clean energy production goals

Comment

The corporate executive team is rewarded for meeting key business and financial targets, which includes production targets for zero carbon electric generation (capacity factor targets for nuclear generation, and capture efficiency for renewable assets) which drives zero-carbon electricity production supplied to the grid, minimizing fossil generation dispatch and thereby GHG emissions.
Who is entitled to benefit from these incentives?
   Business unit manager

Types of incentives
   Monetary reward

Activity incentivized
   Emissions reduction target

Comment
   Exelon utilizes a corporate scorecard that includes a specific goal for managing GHG emissions. For 2018, each Operating Company (OpCo) renewed their commitment to our corporate GHG reduction goal to reduce emissions 15% by 2022 by establishing an annual milestone target for direct and indirect CO2e emissions from our operations-drive sources. These OpCo specific GHG targets were part of their OpCo level performance metrics, in addition to targets for advancement of clean energy (nuclear, renewables and distributed generation), as they applied to their unique business area. Performance towards these metrics is a consideration in manager personal performance evaluations which determines annual financial incentive payments.

Who is entitled to benefit from these incentives?
   Environment/Sustainability manager

Types of incentives
   Monetary reward

Activity incentivized
   Energy reduction target

Comment
   Individual performance reviews for employees are conducted semi-annually. For those who have responsibilities linked to environmental performance (including GHG emissions) and climate initiatives (including specific GHG reduction program management and communicating on issues of climate change), their annual performance rating takes into account their performance as it relates to working towards those goals and
their compensation is linked to those results. In 2018, goals specific to performance against our GHG emissions reduction goal and long-term climate change scenario analysis for the corporation were part of these performance plans for key individuals.

Who is entitled to benefit from these incentives?
All employees

Types of incentives
- Recognition (non-monetary)

Activity incentivized
- Efficiency project

Comment
Employees receive recognition through various contests and initiatives which help to communicate climate change issues and lifestyle changes that can result in a reduced carbon footprint for employees at home. Each year, Exelon conducts an Environmental Achievement Awards campaign. These awards recognize outstanding employee projects that help sustain the environment while creating value for the company and local communities. Examples include projects that reduce environmental risks, enhance environmental stewardship, increase operational efficiency, utilize innovation and enhance the company’s environmental reputation. In 2018, we announced three award winners and 10 honorable mentions out of 42 total nominations. Prizes for the awards include donations to winners’ selected non-profit environmental organizations with $55,000 of donations made on behalf of winners.

C2. Risks and opportunities

C2.1

(C2.1) Describe what your organization considers to be short-, medium- and long-term horizons.

<table>
<thead>
<tr>
<th>From (years)</th>
<th>To (years)</th>
<th>Comment</th>
</tr>
</thead>
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Short-term 0 2 Short-term aligns with our immediate budget planning horizon.
Medium-term 2 6 Medium-term aligns with our longer term financial business plans which extend out five years.
Long-term 6 30 Long-term aligns with strategic planning process focused on overall corporate strategy, industry trends and broader outlook into the future beyond 5 years out.

C2.2

(C2.2) Select the option that best describes how your organization’s processes for identifying, assessing, and managing climate-related issues are integrated into your overall risk management.

Integrated into multi-disciplinary company-wide risk identification, assessment, and management processes

C2.2a

(C2.2a) Select the options that best describe your organization’s frequency and time horizon for identifying and assessing climate-related risks.

<table>
<thead>
<tr>
<th>Row</th>
<th>Frequency of monitoring</th>
<th>How far into the future are risks considered?</th>
<th>Comment</th>
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<tbody>
<tr>
<td>1</td>
<td>Six-monthly or more frequently</td>
<td>&gt;6 years</td>
<td>Exelon regularly performs risk assessments to identify and assess the top risks facing our company. This assessment framework examines strategic, financial, operational, regulatory/compliance and reputational risks, and has been automated for enhanced intelligence and risk analytic capabilities. Exelon employs various market, credit, liquidity and operational risk assessment tools to identify financial and business risk exposures that are evaluated by executive risk management committees at the corporate level and within our major operating units. The ERM group works with these operating units regularly to identify, assess and manage key risks. The ERM process works with our Strategic Plan, focusing on risks up to 10 years out, and emerging risk reporting focuses on risks beyond the 10-year horizon. Widespread system outages</td>
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resulting from major weather events is a risk that we actively manage, including the increasing frequency and severity of such events in a changing climate.

C2.2b

(C2.2b) Provide further details on your organization’s process(es) for identifying and assessing climate-related risks.

Exelon has a formal, well-established approach for Enterprise Risk Management (ERM). It uses a continuous, systematic and dynamic risk identification and assessment process that works by partnering with its major operating units in a hands-on, collaborative approach to managing risk. Risk monitoring covers all geographic areas where we operate and occurs continuously throughout the year. Risk issues are regularly reviewed with Executives as well as Exelon’s Board of Directors. The ERM Policy and corresponding Corporate Risk Appetite Statement provide the framework and governance by which we address financial, regulatory/compliance, reputational, operational and strategic risks that have been identified (each of which includes elements that may be impacted by climate change either with respect to business model considerations or physical climate risks or both). Operationally, ERM interacts regularly with the business. The ERM process also works with our strategic planning process to capture risks up to 10 years out and emerging risk reporting focuses on risks beyond that horizon. Our definition of ‘substantive financial impact’ when identifying or assessing and disclosing climate-related risks would be consistent with that used for other business risk in our regular SEC 10-K filing. We do not view climate change as a single risk, but rather a stress multiplier to existing risks and opportunities already under considerations. We also recognized that climate change may affect different parts of our business in different ways.

Potential climate change impacts to our business model are included in our corporate strategic plan. Exelon’s business strategy is informed by our views of the durable trends in our industry, which we have identified as evolving customer expectations, accelerating technology development, flat to low demand growth, low natural gas prices, growing interest in clean generation, and continued development of local generation resources. Risks relating to climate change are captured as part of these durable trends. Five of the six durable trends encapsulate climate change risks and opportunities directly. At this time, short term climate related risks include appropriate valuation for our zero-carbon nuclear generation and the need for enhancing the resiliency of our assets to withstand increased storm frequency and intensity. Over the mid-term, we see the need for continued focus on mitigating GHG emissions from our own operations, maintaining the high performance of our nuclear generation stations to sustain the ongoing supply of zero carbon generation at the highest level and on-going efforts to bolster resiliency in our assets and distribution systems. On the long-term, our focus is on risks associated with new and emerging technologies that might disrupt our current business model and how to set ourselves up for continued success in a carbon constrained economy long into the future. As a response to the durable trends, our four strategic focus areas work to transform these potential business risks into opportunities, building on customer and community partnerships, innovation within the energy sector, and
developing/deploying low-carbon energy solutions to help meet customers' interest and need for clean energy products and services, including local renewable generation and electrification of transportation.

Specific assessment of physical climate change risks, including the use of regional projections, are being evaluated at the site level and within our infrastructure planning processes. As our utilities are required to act in the public interest, investments we make in our distribution systems need to be supported by analytically sound and robust analysis in order be approved by Public Utility Commissions. Therefore, the identification of potential climate change risks is still primarily event driven, since longer-term climate projections at the local level are just becoming available and are subject to significant uncertainty, limiting used for the preparation of adequate cost-benefit analyses. Exelon is continuing to explore the integration of future climate change projections into our already robust planning processes. For example, given all Exelon utilities shares best practices, one potentially disruptive event can drive performance improvement and proactive planning across all of Exelon utilities.

As part of our climate risk management efforts, Exelon joined the DOE Partnership for Electric Sector Climate Resilience as a founding member. We completed a vulnerability assessment in 2015, developed a climate change resilience plan in 2016, and are continuing to use the National Climate Assessment’s work to advance our climate change resiliency strategy and risk framework. We continue to explore ways to increase climate change related training, improve our planning processes, and increase coordination with local organizations working on similar climate efforts.

### C2.2c

(C2.2c) Which of the following risk types are considered in your organization's climate-related risk assessments?

<table>
<thead>
<tr>
<th>Relevance &amp; inclusion</th>
<th>Please explain</th>
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<tbody>
<tr>
<td>Current regulation</td>
<td>Relevant, always included</td>
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Current regulations can carry a risk of limiting evolution of business models, especially as they relate to a public utility. A quarter century ago, all states had vertically integrated electric utility companies that were fully regulated by state public service commissions. At that time, capital spending plans were approved by Public Service Commissions (PSC). Vertically integrated utilities owned both transmission and distribution (T&D) systems, as well as the power generation resources needed to meet each utility customers’ energy needs. Starting in the mid-1990s, many states elected to incorporate customer choice into their electricity markets, with a primary focus of reducing electricity costs. Today, 20 states, including all states with Exelon utilities, have implemented some form of competitive electricity markets. At the time of restructuring, vertically integrated utilities were required to divest or separate all power generation resources from their other businesses.
As a result, power generation became a competitive business with generation technologies and investments determined by market forces rather than PSC requirements. Exelon’s current business model is referred to as a “competitive-integrated model,” since Exelon Corporation owns both regulated T&D utilities (ACE, BGE, DPL, ComEd, PECO and Pepco), and competitive power generation (Exelon Generation) assets, as well as a retail energy business (Constellation). The strength of Exelon’s business model is that we can respond to durable industry trends across the value chain to maximize customer benefits and returns on capital investment. Since the time of restructuring, expectations for grid management have evolved based on new technologies and customer interest. State regulators and other stakeholders are revisiting the role that utilities should play in the energy system of the future. Exelon is participating in these efforts to transform policies and regulations so that utilities may perform valuable functions and offer services that would benefit customers that were simply not envisioned at the time of restructuring. Examples include deploying local generation resources like solar energy, fuel cells and batteries; local resiliency projects, such as microgrids that require wire integration, local generation and energy storage; and other customer-driven measures to address climate change.

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<tr>
<th>Emerging regulation</th>
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<tr>
<td>The lack of GHG regulations, or those that are poorly designed, have a range of potential impacts on the electric sector. Tighter emission reduction levels, to support decarbonization of the power sector and the larger economy, could be beneficial for Exelon’s low-carbon portfolio comprised of nuclear, natural gas, wind and solar. Exelon’s fleet generates almost twice as much zero-carbon electricity as the next largest producer in the U.S. and has by far the lowest CO2 emission rate among the larger power producers. On June 19, 2019, the U.S. EPA issued the Affordable Clean Energy (ACE) rule and repeal of the Clean Power Plan (CPP), severely weakening Federal regulation of carbon dioxide (CO2) emissions from existing electric generating units, reducing the value differential between lower higher and lower emitting generation sources. Exelon supports GHG emission reduction policies to combat climate change. This includes our participation in the Climate Leadership Council which promotes a revenue-neutral carbon tax whose proceeds would be distributed to Americans as dividends. Exelon is continuing to work with cities, states and regions where we operate to advance GHG emission reduction policies. For example, Exelon actively supported and participated in updates to the Regional Greenhouse Gas Initiative (RGGI) program where states agreed to further reduce CO2 emission budgets from 2020 to 2030. Our clean energy fleet in participating states (Nine Mile Point, R.E. Ginna and James A Fitzpatrick nuclear plants in NY; and Calvert Cliffs nuclear plant and Four Mile, Fairwind and Criterion wind farms in MD) helps ensure these reductions occur affordably without negatively impacting reliability. Exelon co-owns the Salem nuclear generating plant with PSEG, similarly supporting New Jersey with zero-carbon generation as that state re-joins RGGI. Exelon has also continued to support implementation of zero-emission credit (ZEC) programs in NY, NJ, and IL. These ZEC programs help...</td>
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Exelon Corporation CDP Climate Change Questionnaire 2019 Thursday, August 1, 2019

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<tr>
<th>Technology</th>
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<td>New and emerging technology creates a risk of disrupting exiting systems and processes by approaching solutions in different ways. As a result, the centralized generation and T&amp;D system, though still fundamentally central to the generation and distribution of electric power, is transforming. An intelligent electric network, enabled by two-way communication technologies and the expanding “internet of things,” is emerging to create a smart power grid. Both regulated utilities and third parties are deploying new technologies that provide options to more efficiently monitor and manage energy usage, as well as to integrate local generation resources into the emerging smart grid. However, there are risks associated with proper integration of these new technologies and the long-term operational effectiveness in relation to the larger grid system. Constellation Technology Ventures is the venture investing organization within Exelon. Exelon has also established a series of internal working groups to foster and manage the identification and evaluation of emerging technology and innovation for Exelon and our customers. One example is our TechEXChange initiative which is charged with exploring technology that has the potential to transform the industry through teams with representation (up to 60 individuals) across the company that collaborates with government and industry associations, national labs, top universities, venture capital and private equity firms. To date, the team has identified more than 25 opportunities within its five focus areas of battery storage, fuel cells, vehicles powered by alternative fuels, water and hydrogen. An example of success from this is a collaboration with Argonne National Laboratory where Exelon took the lead in designing and founding Volta Energy Technologies (Volta), an independent investment company devoted to advancing battery technologies for all industry sectors by leveraging national lab testing to better direct capital investments for new technology start-ups. These innovations have the potential to impact energy markets and create new value channels for Exelon and our customers. In 2018, the TechEXChange focused on opportunities, technologies and trends associated with electrification to drive a transition to a clean energy future and value for our consumers in the near and long term.</td>
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<th>Legal</th>
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|       | Changes to laws and implementation at the federal, state and local levels are a necessary component of deep decarbonization efforts to mitigate climate change. From the perspective of a low carbon-intensity generator, failure to enact laws that effect deep decarbonization is a regulatory risk. Legal support for new or emerging markets relating to renewable, clean energy, or carbon emissions reduction offsets is a risk that is continually reviewed to ensure that we are developing commercial mechanisms to participate in these new markets in a sustainable and credible manner. While the
buying, trading and selling of “renewable energy credits (RECs)” has been occurring for over a decade – the unbundling of this environmental attribute from the electron that provides power – tracking systems in the market are still maturing. This is similarly true for “carbon offsets”, which are verified reductions in GHG emissions which can also be purchased in support of carbon goals. These attribute markets are a necessary means of driving emissions reductions in the most cost-effective manner and engaging more individuals in the effort, but legal support is needed to ensure both the buyers and sellers of such products are protected. Exelon’s Constellation retail company is active in this market. In 2018, Constellation procured 3.7 million RECs for customer’s voluntary programs, enabling them to avoid 1.9 million metric tons of GHG emissions and support the development of renewable power generation. Emissions Free Energy Credits (EFECs) are certificates that represent the emission-free attributes of generating sources, such as nuclear, that also do not directly emit GHGs from combustion and can be used to meet business environmental targets or to show support for clean energy beyond renewables. In 2018, Constellation retired 5.8 MWh of EFECs clean energy benefits for its commercial customers, as well as 1.8 MWh to cover Exelon’s grid electric purchases. Constellation also manage's the attribute associated with Exelon Generation’s renewable generation and ensures Constellation NewEnergy (CNE) meets state RPS obligations where CNE sells energy. Exelon was also part of the Electric Vehicle Charging Carbon Coalition (EVCCC), which successfully developed a Verified Carbon Standard (VCS) approved methodology for capturing carbon offsets from electric vehicle charging in 2018.

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<th>Market</th>
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<td>Certain anomalies in wholesale power markets impede the transition to cleaner sources of electricity and pose risks for existing clean generation’s financial viability. In general, existing markets focus on lowest market costs and assign no value to clean energy, nor do emitting sources pay the social cost of their GHG emissions. Renewable Portfolio Standard mandates and Federal renewable subsidies help level the playing field for those technologies, but not consistently for zero-carbon nuclear. These combined impacts are causing many nuclear plants to close before the end of their licensed lifetimes. Eight plants have closed in recent years, resulting in CO2 emissions some 27 million metric tons higher than if they had continued to run. With the retirements in 2019 of Pilgrim and Three Mile Island, that number will rise to 34 million metric tons of CO2 not avoided. Another 10 nuclear units have announced early retirement and others, including some Exelon units, could follow should markets continue to fail to recognize the value of low carbon sources. In addition to clean energy, our customers demand an affordable and resilient power system that provides electricity under a wide range of weather and demand scenarios which could be impacted by climate-related changes. Exelon believes that wholesale energy markets need to evolve to properly value reliable, clean and affordable energy. Wholesale competitive power markets, as currently designed, do not adequately consider generating resources’ ability to withstand fuel supply</td>
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disruptions, whether from extreme winter weather or physical supply infrastructure risk. Exelon participates in several government and independent system operator initiatives to review opportunities to better value reliability and resilience of the electricity market. These include efforts in the PJM power pool to evaluate opportunities to better value the output of block loaded units (units needed to support demand during most hours of the year, but that cannot easily cycle down during low price hours, typically at night, thereby not being compensated for their cost of operation during these low-price hours).

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<th>Reputation</th>
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| As the largest generator of zero-carbon electricity in the nation, Exelon’s reputation is in part defined by its leadership on the issue of climate change action and the transition to a clean energy future. In addition, Exelon has set and achieved several internal reduction goals, including our first commitment with the EPA Climate Leaders program in 2008 with a 36% reduction in our own emissions, through our early achievement of our Exelon 2020 goal with over 18 million metric tons of GHG abatement in a single year, Exelon has worked to show that GHG reductions can be achieved in an economically efficient manner by looking across the energy value chain and valuing all low carbon technologies equally. Nevertheless, because of Exelon’s already very clean fleet, Exelon is not always perceived as achieving marginal reductions. In addition, given our operation in regional electric markets, our actions often decrease overall grid emissions that are not always attributed as our own. While we make every effort to present the idea of GHG grid displacement or avoided emissions from clean generation already on the grid, challenges in communicating our ongoing efforts in this area poses a risk to our reputation. In an effort to continue showing leadership in this area, in 2017 Exelon established a new absolute GHG goal focused on reducing emissions from our internal operations 15% from a 2015 baseline by 2022, and closed 2018 on track to achieve this goal.

<table>
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<tr>
<th>Acute physical</th>
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| An increased risk of flooding to substations has been noted in our service territories. As part of the root-cause analysis for one of the past flooding events, the need to better understand current-day flood risks to substations was identified as a priority to mitigate the risks associated with potential future occurrences. Exelon Utilities developed an administrative procedure outlining the requirements for the management of substation flood risk with a specific goal of minimizing and managing the number of high-risk substations on the Exelon system. The procedure established criteria for risk characterization, flood levels that must be assessed, and acceptable mitigation measures. Initial assessments across Exelon Utility’s BGE, ComEd and PECO territories were completed in 2015, while Exelon Utility’s PHI territories completed this assessment as part of merger integration activities in 2016 and 2017. While we are not able to disclose specific locations of critical substations, as a result of the initial analysis, 53 substations were classified as High (Flood) Risk under this program and assessed for appropriate mitigation. Considerations in the decision making relating to the best solution to
<table>
<thead>
<tr>
<th>Risk Category</th>
<th>Relevance</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chronic physical</td>
<td>Relevant, always included</td>
<td>As part of investing in electric transmission, distribution or generation infrastructure assets, potential risks to the operational and financial success of the asset over its life must be considered. This consideration leverages expertise from across the company, and with respect to potential climate change issues, considers regionally specific risks key to the plant's operations. An example of how climate change considerations are incorporated into this process includes our recently complete construction of 2,189 MW of highly efficient combined cycle natural gas generation at our brownfield Wolf Hollow and Colorado Bend generating stations in Texas. As part of our efforts to mitigate climate change risks, we are closely monitoring drought risk and changing precipitation patterns that have the potential to impact our production of electricity, and the Texas locations targeted for these plants have been challenged with respect to drought conditions and water supply. Therefore, we have designed these plants to be air-cooled, eliminating the need for long term water supply as part of their operations. In addition, the quick ramping nature of this generation allows it to respond rapidly to changes in demand and supply, including variable wind power production, supporting a more reliable power system that accommodates renewables increasing in the regional supply. Also, in support of climate change mitigation, depending on annual dispatch, these units also have the potential to lower regional grid emissions by an estimated 1 million metric tons of carbon dioxide (CO2) by displacing higher-emitting generation sources. These units had their first full year of operation in 2018.</td>
</tr>
<tr>
<td>Upstream</td>
<td>Relevant, always included</td>
<td>Exelon has approximately 8,000 suppliers that provide a wide range of materials and services to support our company operations. We recognize the risks associated with a breakdown in this supply chain or any single key supplier, and actively evaluate and monitor our suppliers to ensure that we understand any risks that need to be managed to ensure that our supply chain remains reliable and resilient under multiple potential scenarios. Our Supply and Enterprise Credit Risk Management team has developed a risk management process that uses a structured approach for identifying, communicating and mitigating so called “third party” risks. As part of this process, this team conducts in-depth reviews of our top suppliers. Evaluations address the likelihood and potential impact of a disruption of products and services and assesses risks to our business continuity and compliance, including a review of supplier business continuity plans to</td>
</tr>
<tr>
<td>Downstream</td>
<td>Relevant, always included</td>
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<tr>
<td>Exelon’s Scope 3 emissions from customer use of natural gas and electric are far greater than the emissions that we generate ourselves. We also know that customers and communities have interest in lowering their GHG impacts. Exelon’s utilities are helping customers save energy and reduce their monthly bills by providing them with the tools necessary to allow them to take control of their energy usage that will make their homes and businesses more efficient. These tools include a variety of energy efficiency, real-time pricing and smart usage rewards programs. In 2018, through the results of a combination of new and prior-year investments, our Exelon utilities helped customers save over 21.9 million MWh of energy through the ComEd and PECO Smart Ideas® programs, BGE Smart Energy Savers Program® and PHI Home Energy Savings Program®. This equates to almost 9.9 million metric tons of CO2e emissions avoided. These programs encourage customer savings through home energy audits, lighting discounts, appliance recycling, home improvement rebates, equipment upgrade incentives and new innovative programs like smart thermostats and combined heat and power (CHP) programs.</td>
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<td></td>
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</tbody>
</table>

**C2.2d**

(C2.2d) **Describe your process(es) for managing climate-related risks and opportunities.**

Once climate-related risks and opportunities are identified and assessed through our Enterprise Risk Management process, they are managed either within our strategic planning process (business model risks) or, with a formal risk mitigation plan (operational and physical risks).
Exelon has developed four focus areas to ensure management of the climate-related transitional risks and opportunities as identified in the durable trends through our ERM / strategic plan process. These focus areas include: Creating a culture of technology and innovation; Investing in markets at attractive returns; Maintaining operational excellence, productivity and efficiency; and Evolving our business models and regulatory and market structures. These focus areas form the basis of our business strategy and are not unrelated; they build upon each other in a cycle that creates the opportunity to invest at attractive returns. As we execute our strategy, we apply a consistent customer focus to ensure that we meet our customers’ needs and remain relevant to them in a rapidly changing energy environment. This includes focusing on customer interest in affordable energy, safe and reliable electric and gas service, clean and low-carbon energy, technology and innovation, and investment in people and local communities.

To illustrate this process, our focus on innovation and technology is a means of managing the climate-related risk to our business model from new and emerging technologies associated with clean energy, energy management and energy efficiency. Exelon has established a series of internal groups to foster and manage the identification and evaluation of emerging technology and innovation for Exelon and our customers. By getting in front of the technology and understanding its implications to our business, we are able to transform what may have been a potential business risk into a new business opportunity.

A specific example in this area is our focus on electric vehicles (EVs) and how EV adoption will impact the future energy landscape and the evolving grid. While there could be risks to our existing systems without our involvement, Exelon also recognizes that it has a unique opportunity to support customer demand for transport electrification through our hybrid EV business model. Over the past year, Exelon’s TechEXChange and Exelorate Growth Board have continued to explore ways to encourage adoption of EVs of all types to reduce overall carbon emissions. Potential areas of investment include enabling technology and infrastructure to support larger numbers of EVs, educating consumers and our workforce about EV benefits and partnering with industry associations. On the regulated utility side, our utilities are enabling transportation electrification by investing in distribution systems that support EVs and charging infrastructure investments through utility ownership, incentives or rebates with cost recovery and return opportunities. In 2018, Exelon’s utilities exceeded the commitment it made to EEI of investing 5 percent of our annual fleet acquisition budget on vehicle electrification. ComEd has also supported the Chicago Transit Authority e-bus initiative to add approximately 20 EV buses and charging infrastructure, BGE and PHI have proposals in Maryland that would make the state a leader in advancing EVs on the East Coast and PECO’s is supporting the Clean Transportation Infrastructure Act to increase transportation electrification usage by 50 percent by 2030 and played a role in SEPTA acquiring 25 electric buses. On the competitive side, Constellation Technology Ventures is investing in charging infrastructure through ChargePoint and in transformative vehicle technologies like Proterra and XL. The Exelorate Growth Board launched EZ-EV to support increasing adoption of electric vehicles in the community. EZ-EV educates and helps consumers transition into electric vehicles, helping hundreds of people make the switch since 2016 and is offering this program as a white-labeled service to utilities across the United States.
At this time, physical climate change risks to operations are mitigated at the site level, although our best practices sharing across our utilities ensures that a single event can help prepare and inform proactive planning across all of the Exelon utilities. One example of this relating specifically to climate resiliency is the development of an administrative procedure outlining the requirements for the management of substation flood risk, with a specific goal of minimizing and managing the number of high-risk substations on the Exelon system. The procedure established criteria for risk characterization, flood levels that must be assessed, and acceptable measures for mitigating risk, and since 2015 has been applied across all of Exelon utility systems identifying 53 substations as high risk for flood and undertaking mitigation actions to prevent disruption from flooding at these sites.

**C2.3**

(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes

**C2.3a**

(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.

---

**Identifier**

Risk 1

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type**

Transition risk

**Primary climate-related risk driver**

Policy and legal: Other
Type of financial impact
Write-offs, asset impairment, and early retirement of existing assets due to policy changes

Company-specific description
Investments in the electric power generation sector tend to be very capital intensive and long-lived (e.g. 40 or more years for generation). The substantial investments in power generation and transmission and distribution businesses creates financial exposure if future regulations are not appropriately anticipated and risks managed. Uncertainty surrounding new climate change and environmental regulation takes many forms, including a risk that these regulations may not value all low carbon technologies equally. Exelon is one of the largest competitive U.S. power generators, with more than 32,460 megawatts of owned capacity comprising one of the nation’s cleanest and lowest-cost power generation fleets. Because a substantial portion of Exelon’s generation portfolio is comprised of nuclear generation, should climate change regulations develop in a way that does not recognize zero carbon generation from nuclear or should climate change regulation fail to come about, Exelon may not be able to capture full potential value for the generation from these assets. Exelon and Generation continue to evaluate the current and expected economic value of each of Generation’s nuclear plants. Factors that affect the economic value of Generation’s nuclear plants include, but are not limited to: market power prices, results of capacity auctions, potential legislative and regulatory solutions to ensure nuclear plants are fairly compensated for their carbon-free emissions, and the efforts of states to implement those final rules.

Time horizon
Current

Likelihood
Very likely

Magnitude of impact
High

Are you able to provide a potential financial impact figure?
No, we do not have this figure

Potential financial impact figure (currency)

Potential financial impact figure – minimum (currency)
Potential financial impact figure – maximum (currency)

**Explanation of financial impact figure**
The early retirement of Exelon Three Mile Island Unit 1 (TMI) nuclear plant provides a good example of the financial implications of the failure to sufficiently account for nuclear generation’s zero emission attributes. In Pennsylvania, the TMI nuclear plant did not clear in the May 2018 PJM capacity auction for the 2021-20212 planning year; the fourth consecutive year that TMI failed to clear the capacity auction. Based on these capacity auction results and prolonged low wholesale power prices, Exelon announced that it would prematurely retire TMI in 2019, as needed policy reforms to recognize the environmental and resiliency benefits from zero-carbon nuclear energy plants did not occur. This follows a similar experience at Exelon’s Oyster Creek generation station in New Jersey, which permanently ceased operations in 2018. The actual incremental non-cash expense item incurred was $628 million in 2018 due to these early retirement decisions.

**Management method**
Exelon is a long-time supporter of comprehensive and effective federal GHG legislation and regulation; however, as a means to compensate for uncertainty at the federal level, Exelon has focused on advocating for state action where possible. An example of this effort is our advocacy associated with the passing of the Illinois Future Energy Jobs Act (FEJA) to ensure appropriate valuation of nuclear generation at the state level to preserve this low carbon generation. The IL FEJA includes a Zero Emissions Standard (ZES) similar to a Renewable Portfolio Standard (RPS), but valuing all zero-carbon generation including nuclear, instead of just renewables. This will now provide additional value to preserve the environmental attributes of zero-emissions nuclear-powered generating facilities that meet specific eligibility criteria. This increased valuation for IL nuclear generation allowed for the reversal of the initial early retirement costs originally booked for Clinton and Quad Cities and will increase the annual value of future generation through the time frame of the regulation. Exelon has supported the successful implementation of similar programs in NY and NJ, and has worked PA and other states to promote legislation that could prevent other nuclear early retirements.

**Cost of management**
0

**Comment**
Exelon maintains a Regulatory Advocacy group as part of its regular business costs.
**Identifier**  
Risk 2

**Where in the value chain does the risk driver occur?**  
Direct operations

**Risk type**  
Physical risk

**Primary climate-related risk driver**  
Acute: Increased severity of extreme weather events such as cyclones and floods

**Type of financial impact**  
Increased capital costs (e.g., damage to facilities)

**Company-specific description**  
Extreme weather conditions or damage resulting from storms could stress Exelon's utility's transmission and distribution systems, communication systems and technology, resulting in increased maintenance and capital costs and limiting each company's ability to meet peak customer demand. These extreme conditions could have detrimental effects on the Utility Registrants' results of operations, cash flows or financial positions. First and third quarter financial results, in particular, are substantially dependent on weather, and could make period comparisons less relevant.  
Generation's operations are also affected by weather, which affects the demand for electricity as well as operating conditions. To the extent that weather is warmer in the summer or colder in the winter than assumed, Generation could require greater resources to meet its contractual commitments. Extreme weather conditions or storms could affect the availability of generation and its transmission, limiting Generation's ability to source or send power to where it is sold. In addition, drought-like conditions limiting water usage could impact Generation's ability to run certain generating assets at full capacity. These conditions, which cannot be accurately predicted, could have an adverse effect by causing Generation to seek additional capacity at a time when wholesale markets are tight or to seek to sell excess capacity at a time when markets are weak.

**Time horizon**  
Medium-term
Likelihood
Likely

Magnitude of impact
Medium-high

Are you able to provide a potential financial impact figure?
No, we do not have this figure

Potential financial impact figure (currency)

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure
Storm recovery costs are planned for in each of our utilities annual operating budgets, but costs can vary year to year by 10 to 100 million dollars depending on the significance of storm events. In March 2018 there were powerful nor’easter storms that brought heavy snow, ice and high sustained winds that interrupted electric delivery to customers in PECO’s, BGE’s, Pepco’s, DPL’s and ACE’s service territories. Restoration efforts included significant costs for employee overtime, support from other utilities, and contracted tree trimming crews, which resulted in incremental O&M expense and capital expenditures in the first quarter of 2018. Total winter storm related costs for Exelon were $173 million in 2018 including both incremental O&M and capital expenditures (excluding amounts that were deferred and recognized as regulatory assets). These costs relate to the restoration of service to over 1.7 million customers.

Management method
Exelon has an Emergency Response Organization in place to respond to weather emergencies. Exelon also has a weather forecasting function that helps to alert our business units and plants of impending storms so that they can prepare accordingly. If a weather event impacts the stability of the electric grid, we also have procedures and programs in place to shed or reduce load. In addition, we implement enhanced visual inspections of critical system infrastructure in extreme heat or cold conditions. Exelon is also installing and using advanced smart grid and
smart meter technologies to avoid outages and speed recovery. Smart grid technologies can help with early identification of outage location and specifics, as well as identify equipment experiencing issues such that outages can be averted. Through December 2018, we upgraded more than 10 million smart electric and gas meters at the Exelon utilities. Exelon has also formalized a procedure for flood risk analysis at substations to proactively assess and mitigate risks associated with storm flooding. We also work with local communities to develop cost effective and appropriate resilience efforts for their areas. In 2017, the Council of the District of Columbia approved one of Pepco’s largest infrastructure projects, the District of Columbia Powerline Undergrounding initiative, which aims to reduce storm damage from overhead lines. The multiyear program focuses on the undergrounding of vulnerable distribution power lines.

Cost of management

500,000,000

Comment

The cost of management shown relates specifically to the DC undergrounding initiative. This initiative involves a partnership between Pepco and DC to achieve a more resilient and reliable electric grid. The Public Service Commission of the DC approved the first biennial plan and the financing order application in November 2017, authorizing $500 million for this initiative. This project will result in significant benefits to the local and regional economy through contracting and procurement opportunities and jobs.

More broadly, Exelon invested $5.3 billion across its regulated utilities in 2018 and plans to invest approximately $23 billion in our utilities from 2019 through 2022. This investment includes a subset of actions which address the physical risks from climate change, like storm-hardening and integration of new technologies such as smart meter/smart grid which supports storm recovery.

Identifier

Risk 3

Where in the value chain does the risk driver occur?

Direct operations

Risk type

Transition risk
Primary climate-related risk driver
  Market: Uncertainty in market signals

Type of financial impact
  Change in revenue mix and sources resulting in decreased revenues

Company-specific description
  The wholesale markets vary from region to region with distinct rules, practices and procedures. Changes in these market rules, problems with rule implementation, or failure of any of these markets could adversely affect Exelon’s current business model. The spot market price of electricity for each hour is generally determined by the marginal cost of supplying the next unit of electricity to the market during that hour. Thus, the market price of power is affected by the market price of the marginal fuel used to generate the electricity unit. Often, the next unit of electricity will be supplied from generating stations fueled by fossil fuels. Consequently, changes in the market price of fossil fuels often result in comparable changes to the market price of power. With the continued addition of supply from new alternative generation resources which do not have variable fuel cost, such as wind and solar, this fuel price market signal could be impacted. Similarly, mixed market signals which show actual customer demand as flat or declining while climate mitigation efforts are calling for electrification, can make longer term investment in generation or load planning more difficult. In addition, further delay or elimination of EPA air quality regulations could prolong the duration for which the cost of pollution from fossil fuel generation is not factored into market prices. These weakened or changed market signals can challenge existing methods of managing market risks.

Time horizon
  Medium-term

Likelihood
  Very likely

Magnitude of impact
  High

Are you able to provide a potential financial impact figure?
  No, we do not have this figure

Potential financial impact figure (currency)
Exelon's financial performance can be materially affected by energy prices and changes in customer demand by reducing operating revenues, increased O&M expenses, and increased capital expenditures. Climate change issues, among other things, may play a role in these market uncertainty risk drivers although it is often difficult to discretely separate what can be directly attributed to it incrementally. Mark to market gains is one indicator of how Exelon Generation is managing market risks commodity price fluctuations by entering into economic hedges. Mark-to-market performance on this hedging activities were losses of $319 million in 2018 compared to losses of $175 million in 2017. Revenues were also impacted by a decrease of $66 million in our Generation company primarily due to lower realized energy prices, as well as other factors. Only a portion of this market fluctuation can be directly attributed to climate change influences, limiting our ability to report a discrete value.

Management method
Exelon is continually analyzing market conditions, regulatory developments and new technologies in order to best position itself. Exelon maintains a Corporate Strategy organization that analyzes market trends, key risk indicators, and anticipated developments in the market to retain its role as an industry leader. This includes coordination of cross-company analysis on the issue of climate change, potential risks associated with various future scenarios and identification of key signposts that might indicate changes in market signals from today which can help influence and inform other areas of the company. Exelon also maintains a Markets Fundamental organization that uses internal and external market information, tools and approaches to inform the organization of potential business performance under a variety of scenarios, including those impacted by carbon regulation / price on carbon. Generation’s competitive businesses create value for customers by providing innovative energy solutions and reliable, clean and affordable energy. Generation’s customer-facing activities foster development and delivery of other innovative energy-related products and services for its customers. Generation operates in well-developed energy markets and employs and its generation fleet, including its nuclear plants which consistently operate at high capacity factors, also provide geographic and supply source diversity to help mitigate challenges.

Cost of management
Comment
Exelon’s Corporate Strategy and Market Fundamentals organizations are an integrated element of the business and do not require additional discrete costs for the management of climate-related issues. The Market Fundamentals organization is continually updating their modeling capabilities to provide the best view of regulatory, technological and other trends which may have significant impacts on our business, to include potential carbon pricing or regulation to reduce GHG emissions.

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**Identifier**
Risk 4

**Where in the value chain does the risk driver occur?**
Customer

**Risk type**
Transition risk

**Primary climate-related risk driver**
Reputation: Increased stakeholder concern or negative stakeholder feedback

**Type of financial impact**
Reduced revenue from decreased demand for goods/services

**Company-specific description**
As the largest generator of zero-carbon electricity in the nation, Exelon’s reputation is in part defined by its leadership on the issue of climate change action and the transition to a clean energy future. In addition, Exelon has set and achieved several internal reduction goals, including our first commitment with the EPA Climate Leaders program in 2008 with a 36% reduction in our own emissions, through our early achievement of our Exelon 2020 goal with over 18 million metric tons of GHG abatement in a single year, Exelon has worked to show that GHG reductions can be achieved in an economically efficient manner by looking across the energy value chain and valuing all low carbon technologies equally. Nevertheless, because of Exelon’s already very clean fleet, Exelon is not always perceived as achieving marginal reductions. In addition, given
our operation in regional electric markets, our actions often decrease overall grid emissions that are not always attributed as our own. While we make every effort to present the idea of GHG grid displacement or avoided emissions from clean generation already on the grid, challenges in communicating our ongoing efforts in this area poses a risk to our reputation.

**Time horizon**
- Medium-term

**Likelihood**
- Likely

**Magnitude of impact**
- Medium

**Are you able to provide a potential financial impact figure?**
- No, we do not have this figure

**Potential financial impact figure (currency)**

**Potential financial impact figure – minimum (currency)**

**Potential financial impact figure – maximum (currency)**

**Explanation of financial impact figure**
The economic value of reputation is difficult to quantify with precision. However, we do understand that adverse impacts to reputation can impact a broad range of variables that do have financial metrics, such as: stock price, cost of capital, relationships with regulatory authorities, customer satisfaction, as well as employee recruitment and retention. According to the World Economic Forum, 25% of a company’s market value is directly related to its reputation. While no specific value can be realistically assigned for Exelon, reputation is an important source of value to investors and encapsulates the value of intangible elements of a company’s internal corporate governance and the quality of its management; both of which can be very important assets during times of uncertainty.
Management method
In an effort to continue to show leadership in this area, in 2017 Exelon established a new absolute GHG goal focused on reducing emissions from our internal operations by 15% from a 2015 baseline by 2022, and at the end of 2018 is on target to meeting this goal. Exelon has also begun to third-party verify Supplier Specific emissions factors for its Constellation New Energy electricity retail organization in support of advancing GHG accounting with its customers.

Cost of management
75,000

Comment
Exelon's GHG management program is integrated into each business, and thus foundational to our providing economical, clean and low carbon electricity supply options for our customers. In 2018, Exelon spent approximately $75,000 for the verification of its GHG inventory. Exelon also prepares a broader Corporate Sustainability Report designed to relate our corporate sustainability strategy and outcomes, including, GHG mitigation and climate change action.

C2.4

(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?
Yes

C2.4a

(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.

Identifier
Opp1
Where in the value chain does the opportunity occur?
Direct operations

Opportunity type
Energy source

Primary climate-related opportunity driver
Use of lower-emission sources of energy

Type of financial impact
Reduced exposure to GHG emissions and therefore less sensitivity to changes in cost of carbon

Company-specific description
Exelon’s generation portfolio has relatively low GHG emissions intensity (100 lbs/MWh in 2018) compared to other US generating companies (1,000 lbs/MWh) because approximately 89% of our annual output is produced from zero-carbon nuclear resources and renewables. We continue to support federal policy that places a value on carbon emissions as the most efficient solution for reducing GHG emissions. As a low cost, low carbon generator, Exelon is well positioned to benefit from imposition of a carbon price. Exelon’s sustainability programs focus on identifying opportunities to grow the business without increasing risks associated with carbon emissions. These include investing in new technologies such as Proterra electric buses and XL, the leader in connected fleet electrification solutions for commercial and municipal fleets; as well as partnering in the piloting of new technologies such as the 50-MW NetPower plant to demonstrate supercritical carbon dioxide (sCO2) cycle technology that offers higher density and competitive thermal efficiencies versus conventional steam- and turbine-driven power generation technologies without producing atmospheric emissions. Exelon Generation has also worked to maximize the output of its existing nuclear fleet by completing power uprates on many of its generating units. Specifically in 2018, we completed an uprate to Unit 1 at the Calvert Cliffs facility that added 15.92 MWe to the production capacity of this site.

Time horizon
Medium-term

Likelihood
More likely than not

Magnitude of impact
High

Are you able to provide a potential financial impact figure?
No, we do not have this figure

Potential financial impact figure (currency)

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure
During 2018 Exelon generated over 166 million MWh of nuclear generation and nearly 6.4 million MWh of renewable generation. Additional market price for carbon potentially represents additional margin that could be realized under any such new market structure that recognizes nuclear and renewable benefits. The potential financial impact would ultimately depend upon the level of the carbon price that was enacted and the extent to which it applied to the energy sector. Policy that values all zero-carbon technologies equally (i.e. not favoring renewables over nuclear), would greatly impact both the success of the GHG emissions reductions, as well as the potential financial impact to Exelon’s generation fleet. As an example, under the new IL FEJA regulations, Exelon’s Clinton Unit 1 and Quad Cities Unit 1 and 2 nuclear plants were selected as the winning bidders. As a result, in 2018, Generation recognized revenue of $373 million from this new ZEC program from 2017 and 2018 activities.

Strategy to realize opportunity
Exelon continues to support development of a long-term national energy policy that places a price on carbon (utilizing market-based implementation and compliance mechanisms) to incentivize market-driven investments in lower carbon technologies. In the interim, we are working with states to serve as incubators for innovative policies to address complex economic and energy challenges. For example, Exelon actively participated in, and supported, the recent updates to the Regional Greenhouse Gas Initiative (RGGI) program where states agreed to further reduce CO2 emission budgets over time. Our clean energy fleet in this region (Nine Mile Point, Ginna and Fitzpatrick nuclear plants in NY; and Calvert Cliffs nuclear plant and Four Mile, Fairwind and Criterion wind farms in MD) helps ensure these reductions occur affordably and reliability. Exelon has also continued to support implementation of zero-emission credit (ZEC) programs in NY and IL. In the absence of federal
action, these ZEC programs help to compensate nuclear power plants for the 24 hour/7 day a week zero-emission attributes that they currently provide. Between 2015 to 2022, Exelon’s nuclear fleet will avoid an estimated 650 million metric tons of GHG emissions, like removing one half of US cars from the roads for a year.

Cost to realize opportunity
0

Comment
Exelon maintains a Regulatory Advocacy group as part of its regular business costs. We also engage with stakeholder groups including the Bipartisan Policy Center, the Center for Climate & Energy Solutions (C2ES) and the MIT Global Change Forum. Exelon has a GHG management program to recognize the carbon benefits of clean energy technologies, and internal and customer energy saving programs. Exelon is also continually increasing its low carbon generation. Since 2008, Exelon Generation has placed into service projects representing 562MWs (15 MW in 2018) of new nuclear (uprates at existing plants). In addition, during 2018, Constellation added nearly 30 MW of new distributed solar for a total of more than 484 MW of distributed energy assets in operation or under development in the United States. We have also bought online the Hyperion biogas plant for the City of LA, and the biomass combined heat & power onsite generation for the Proctor & Gamble facility in GA.

Identifier
Opp2

Where in the value chain does the opportunity occur?
Direct operations

Opportunity type
Products and services

Primary climate-related opportunity driver
Development and/or expansion of low emission goods and services

Type of financial impact
Increased revenue through demand for lower emissions products and services

**Company-specific description**

The market for electric vehicles (EVs) has grown significantly and EV adoption will impact the future energy landscape and the evolving grid. Exelon has a unique opportunity to support customer demand for transport electrification through our EV business model that leverages our exiting utility relationships to increase EV adoption. Increased use of electricity for transportation would increase demand for electricity, increasing the demand for power generation from our generating assets, as well as delivery services from our utilities. Also, since Exelon is a low carbon generation company, to the extent that this effort is done as a means of reducing GHG emissions, it could also more specifically increase demand for our low carbon generation portfolio. Examples of our involvement in EVs to lower community GHG emissions while increasing use of electricity include our investments in Proterra electric Buses and XL, the leader in connected fleet electrification solutions for commercial and municipal fleets. A few additional examples of specific utility actions in 2018 include ComEd’s support for the Chicago Transit Authority e-bus initiative to add approximately 20 EV buses and accompanying charging infrastructure, BGE and PHI proposals in Maryland that would make the state a leader in advancing EVs on the East Coast and PECO’s support for the Clean Transportation Infrastructure Act to increase transportation electrification usage by 50 percent by 2030. To position the local grid infrastructure for EV adoption, the utilities are also working with state regulatory agencies to ensure investments can be recovered and the grid remains resilient and reliable as new load is added to the system.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

Medium

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**
**Potential financial impact figure – minimum (currency)**

**Potential financial impact figure – maximum (currency)**

**Explanation of financial impact figure**
In 2018, Exelon Generation had operating revenues of $20 billion. If demand for electricity were to increase the power prices, this could result in increased revenues for Exelon. The exact benefits to Exelon of increased electrification of the transportation sector would ultimately depend upon how the vehicle charging infrastructure was deployed and the rate of electric vehicle adoption across the various elements of the transportation sector. Our involvement in the emergence of this new use of electricity can help to ensure we are able to meet new electricity demand appropriately and maximize any potential financial benefits from this expanded demand for our product.

**Strategy to realize opportunity**
Exelon has a series of internal groups to foster and manage the business activities to drive EV adoption in the regions we operate. Over the past year, the TechEXChange and the Exelorate Growth Board have continued to explore ways to encourage adoption of EVs of all types across the enterprise to reduce overall carbon emissions. Potential areas of investment include enabling technology and infrastructure to support larger numbers of EVs, educating consumers and our workforce about the benefits of EV ownership and partnering with industry associations. On the regulated utility side of the business, our utilities are enabling transportation electrification by investing in two key areas: 1) distribution system investments that support customer demand for EVs, and 2) charging infrastructure charging infrastructure investments through utility ownership, incentives or rebates with cost recovery and return opportunities. On the competitive side of the business, Constellation Technology Ventures is investing in charging infrastructure through ChargePoint and in transformative vehicle technology through ProTerra and XL Hybrids. In addition, the Exelorate Growth Board continues to support its program EZ-EV, launched in 2016, which creates a better buying experience for EV customers. EZ-EV lowers upfront costs through pre-negotiated EV deals and transparency of applicable incentives and rebates. EZ-EV has sold 170 cars to date by rolling out the program to Exelon employees.

**Cost to realize opportunity**
0

**Comment**
Exelon has integrated the cost of EV-focused business activities into its in-house Corporate Strategy, Innovation and Sustainability Department, to drive the developed of these new electrification opportunities. We are specifically using our internal TechEXChange program to leverage expertise across the company around the broader topic of electrification. It has also created a Mobility Steering Committee that includes executive level representation of all Exelon utilities to ensure best practice sharing on this topic across the company.

**Identifier**
Opp3

**Where in the value chain does the opportunity occur?**
Customer

**Opportunity type**
Markets

**Primary climate-related opportunity driver**
Access to new markets

**Type of financial impact**
Increased revenues through access to new and emerging markets (e.g., partnerships with governments, development banks)

**Company-specific description**
Increasing our participation in carbon offset markets could create new revenues. Exelon is currently exploring opportunities for capturing carbon offsets in relation to electric vehicles charging infrastructure. Specifically, Exelon participated as a member of the Electric Vehicle Charging Carbon Coalition (EVCCC) to develop an accredited methodology for capturing the carbon reductions credits associated with the transition from tradition transportation fuels to electric vehicles through the metered electric use of vehicle charging infrastructure. This additional revenue from the sales of the aggregated offsets has the potential to help spur investment in the expansion of vehicle charging infrastructure, which is critical to broader EV adoption by ensuring drivers have access to robust, convenient and reliable charging options.

**Time horizon**
Current
Likelihood

Very likely

Magnitude of impact

Low

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

90,000

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure

Financial impact is has been estimated based on a $5 / metric ton value for offsets generated at a rate of 2 tons per EV charging customer per year as aggregated for years 2015 through 2018 for the specific boundary of our proposed pilot project. Actual impact would be dependent upon the value of these offsets in the voluntary market and the rate of EV adoption within our service territories and the interest of customers to participate in this program, and could continue out for as long as 30 years. Any financial benefit would be return to the participating customers or public good depending on the final rules of the program once fully developed.

Strategy to realize opportunity

Exelon has been working as part of a coalition of companies to develop a new methodology for capturing carbon offset associated with electric vehicle charging infrastructure. The carbon offset methodology provides a new accredited platform for EV charging infrastructure companies and investors to generate added revenues by certifying with Verified Carbon Standard the greenhouse gas reduction credits resulting from the electricity dispensed from their chargers. The resulting carbon credits create a new choice for buyers seeking to offset their GHG emissions via transportation-focused investments. This, in turn, accelerates EV-based greenhouse gas reductions, complementing but providing a unique alternative to existing carbon offset sources like sustainable forestry management or methane reduction from landfills. The detailed report
methodology provides the instructions and formulas for EV infrastructure investors to develop precise project descriptions that can become eligible for credible carbon marketplace sales after they are validated and verified. Specifically, the methodology details how measurement of electricity (in kilowatt hours) dispensed at EV chargers corresponds to a reduction of carbon emissions from equivalent fossil fueled vehicles. The methodology also adjusts for the carbon content of localized electricity from utilities as well as project emissions consumed by the EV charging equipment to generate transportation fuel.

**Cost to realize opportunity**

125,000

**Comment**

Cost to realize the opportunity is the one time investment in the coalition partnership through 2018 and the final approval of the methodology. The methodology was awarded final approval in September 2018 and is now being used for evaluating pilot projects in 2019.

**Identifier**

Opp4

**Where in the value chain does the opportunity occur?**

Customer

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Shift in consumer preferences

**Type of financial impact**

Better competitive position to reflect shifting consumer preferences, resulting in increased revenues

**Company-specific description**

As customers seek to be more energy efficient to either save money or take action on climate change, it is increasing the interest in new energy products to help them better manage energy use, attain cleaner sources or pursue distributed generation options. Exelon has an opportunity to
use its expertise to gain market share in this area and provide increasing value to its stakeholders. Exelon’s utilities have continually evolved award winning programs to provide energy efficiency, real-time pricing and smart usage rewards programs necessary to allow customers to take control of their energy usage that will make their homes and businesses more efficient. In 2018, new and prior-year investments helped customers save over 21.9 million MWh of energy (9.8 million metric tons GHG emissions) through the ComEd and PECO Smart Ideas® programs, BGE Smart Energy Savers Program® and PHI Home Energy Savings Program®. These programs include energy audits, lighting discounts, appliance recycling, home improvement rebates, equipment upgrade incentives and new innovative programs like smart thermostats and combined heat and power (CHP) programs. While Exelon’s utilities have been prohibited from directly investing in and owning power generation resources since the time of industry restructuring, our utilities have worked in other ways to enable renewable energy investment and deployment in our states. For example, we are working to integrate local generation into the energy system through the deployment of new metering and other technologies and physical upgrades to distribution system networks. Exelon’s utilities have enabled nearly 104,000 customers to connect 1,232 MW of local renewable generation to the emerging smart grid, and we continue to work on ways to assist customers in connecting local resources to the grid. Our utilities used almost 8.8 million renewable energy credits (RECs) to meet state renewable energy requirements for wind and solar generation last year, supporting the deployment of renewable energy resources in the regions where we operate. Exelon’s utilities are also evaluating potential actions to evolve their business models and state regulatory frameworks to play an even more significant role in enabling renewable energy integration into the emerging smart grid, including potential utility investment in renewable energy resources.

**Time horizon**
- Short-term

**Likelihood**
- Very likely

**Magnitude of impact**
- Medium-high

**Are you able to provide a potential financial impact figure?**
- No, we do not have this figure

**Potential financial impact figure (currency)**
Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure
The means by which the potential financial impact will be realized depends on the regulatory structure in each area where we operate. The regulatory compact that governs utilities must evolve so that all customers can receive the range and quality of affordable services they want, with customer rate structures reflecting the true value that customers receive from the grid, or provide to the grid, and utilities receiving fair compensation for the services they enable and provide. In addition to rethinking customer rate structures and utility compensation mechanisms, removal of unnecessary barriers to utility ownership and investment in distributed energy resources and emerging technologies must be pursued. Due to the unique constraints that exist within each utility’s jurisdiction, the pace and action plan for each Exelon utility will vary as we pursue our ultimate customer and energy services business model.

Strategy to realize opportunity
In response to the transformation occurring in our industry, our utilities are evolving to what we call a Customer and Energy Services (CES) business model, which will substantially enhance our utility operations by facilitating new technologies and allowing us to provide a wider array of products and services to customers. The evolution to the CES business model involves three sequential phases, starting initially with the identification and investigation of opportunities, and then subsequent phases to begin to implement the necessary changes to our businesses over time to realize the potential of new technologies to create value for our customers. Our pilot initiatives associated with microgrids in our Pepco and ComEd utilities provide an example of this effort. In Prince George’s County MD, Pepco has proposed a microgrid to be sited near a medical center and serve the hospital complex and five other facilities during emergencies. It will consist of 6.78 MW of distributed generation and 1.6 MW of storage. The Montgomery County MD proposed microgrid will serve several types of facilities, including government facilities. It will consist of 7.46 MW of distributed generation and 0.25 MW of storage. Both proposals are currently under review by the Maryland Public Service Commission. In early 2018, the Illinois Commerce Commission approved ComEd’s proposal to construct one of the first utility-scale microgrid clusters in the nation in the Bronzeville neighborhood of Chicago.

Cost to realize opportunity
5,300,000,000
Comment
As part of our five-year plan to invest over $25 billion in our regulated utilities, Exelon invested more than $5.3 billion of capital across BGE, ComEd, PECO and the PHI utilities in 2018. Exelon's utilities have completed most of their investments in smart meter technology, having upgraded 10 million smart electric and gas meters at the Exelon utilities through 2018. These investments carry co-benefits of addressing climate change issues by modernizing our systems and enabling the transition of our business model.

C2.5

(C2.5) Describe where and how the identified risks and opportunities have impacted your business.

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<th>Impact</th>
<th>Description</th>
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<tr>
<td>Products and services</td>
<td>Impacted                                                                                                                                                                                                                     Exelon Generation and Utility Companies have already begun to experience the impacts relating to flattened load growth due to an increased focus on energy efficiency efforts (and regulatory requirements for customer energy efficiency programs within the utilities); In addition, they have also seen market impacts in relation to increased focus on renewables resulting from international climate goals and increasing state Renewable Portfolio Standards. Thus far the magnitude of the impact, as combined with low prices of natural gas, have been significantly negatively affected the financial viability of some nuclear generation stations, leading to the announcement of early retirement for certain plants. Exelon has and is taking efforts to ensure nuclear generation is recognized for its contribution to GHG reduction progress by advocating for a value for the clean and reliable aspects of this generation technology at the state level. In 2018, Exelon continued to work with stakeholders on implementation of zero-emission credit (ZEC) programs in New York and Illinois. In the absence of federal action or a meaningful price on carbon, these ZEC programs help to compensate nuclear power plants for the 24 hour/7 day a week zero-emission attributes that they currently provide. The Fitzpatrick plant in NY was slated for retirement but was purchased by Exelon for continued operation once the NY ZEC program was approved. Other plants affected by this issue include Exelon's IL nuclear power plants Braidwood, Byron, Dresden, Clinton, Quad Cities and LaSalle which combined produced 98 million MWh of zero carbon generation in 2018, and Exelon's NY units at Nine Mile Point, Ginna and Fitzpatrick which combined produced over 25 million MWh of zero carbon generation in 2018. Unfortunately, legislation was not able to be enacted in Pennsylvania which led to the announcement to retire Three Mile Island in September 2018, removing over 7</td>
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Exelon Corporation CDP Climate Change Questionnaire 2019 Thursday, August 1, 2019

| Supply chain and/or value chain | Not yet impacted | Exelon has not yet been impacted by a breakdown in its supply chain as a result of climate change, however, due to increasing frequency and intensity of storms, we do recognize this as a risk at any time now or in the near future. As a result, we are taking efforts to better understand our critical suppliers and their efforts to avoid business disruption. Our Supply and Enterprise Credit Risk Management team has developed a process that uses a structured approach for identifying, communicating and mitigating risks. This team conducts in-depth risk reviews for our top suppliers. Evaluations address the likelihood and potential impact of disruption of products and services and assess risks to our business continuity and compliance, including a review of supplier business continuity plans to ensure sufficient consideration of a broad range of potential business disruptions including extreme storms and weather events. The results of these risk reviews are regularly communicated to management. Criteria in risk assessments include: a quantification of the potential costs and other impacts to the business associated with interruptions in the supply chain such as business interruption risk, service and material quality risks and volatility (severity); and estimates of the likelihood of the risk event occurring (probability); an assessment of how essential the supplier is to business functions and company objectives (criticality); and finally, an assessment of the degree to which Exelon and our suppliers have redundancies and alternatives in place to manage unexpected events (resiliency). In 2018, Exelon identified 96 critical Tier 1 suppliers, representing 54 percent of total spend. As part of this process, two high-risk critical Tier 1 suppliers have been identified, with risk mitigation plans implemented to manage risks and to ensure that business interruptions do not occur. As part of our real-time monitoring of our supply chain, Exelon also conducts outreach to suppliers when significant events occur, such as during Hurricanes Florence and Michael in 2018, and takes proactive steps to ensure that needed supplies are not interrupted. Exelon was also a founding member of the Electric Utility Supply Chain Alliance, which is an industry group focused on improving focus on reducing GHG and environmental impacts within its supply chain. |

| Adaptation and mitigation activities | Impacted for some suppliers, facilities, or product lines | In 2013, a ComEd substation experienced flooding due to heavy storms threatening system reliability and significant customer impact. As part of the root-cause analysis for this event, the need to better understand current-day flood risks to substations was identified a priority to mitigate the risks associated with future occurrences of this nature. As a result, Exelon Utilities developed an administrative procedure outlining the requirements for the management of substation flood risk, due to natural causes, with the specific goal to |
minimize and manage the number of high risk substations on the Exelon system. The procedure established criteria for risk characterization, flood levels that must be assessed, and acceptable measures for mitigating risk. Initial assessments were completed in 2015, with a re-evaluation completed in 2018. As part of this process, 54 substations were identified as high risk for flood and are undertaking mitigation actions to prevent disruption from flooding at these sites, with 17 already complete. Exelon is currently examining additional ways to build in climate change projections into this analysis for future re-evaluations.

### Investment in R&D

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<td>Exelon sees the investment in R&amp;D as an opportunity to lessen the risks of new and emerging technologies that may threaten our existing business model. Exelon has been positively impacted by our R&amp;D relationships, as they inform our business strategy and provide new opportunities. The magnitude of these impacts varies based on the subject matter, but can extend from creating new lines of business, improving our own operational performance and/or expanding need for our product through improved adoption of electric vehicles. To further advance this thinking, in Exelon is maintaining several R&amp;D partnerships including: Research and Development Partnership to Advance Next Generation Energy Technology with Argonne National Lab; the Partnership for Clean Energy Innovation with Northwestern University; and membership in MIT Energy Initiative (MITEI) Clean Energy Center focused on energy storage, smarter grids, advanced nuclear generation, and solar energy. Exelon also invests in new and emerging technologies through our Constellation Technology Ventures organization, who’s 2018 portfolio additions included such companies as Measurabl (a GHG data management platform) and V-grid (a leader in renewable energy technology providing sustainable low cost, on-demand electricity and advanced soil carbon technology to the agricultural sector); as well as through our employee-driven Exelorate Growth Board which in 2018 stood up Exelon Aerolabs, which is an asset inspection and performance improvement business that uses drones and robotics, coupled with artificial intelligence (AI) and machine learning, to offer services and provide actionable reports that drive reliability, safety and efficiency improvements which can reduce GHG emissions.</td>
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### Operations

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<td>Exelon nuclear generation stations (as well as those of other companies) have been impacted due in part by the lack of federal climate change regulation to ensure recognition of the zero carbon benefits of nuclear generation. While other factors, such as the low cost of natural gas, have also played a role, imbalanced recognition of carbon benefits across generation technologies has caused these assets to underperform financially to the extent that several have or are facing the possibility of early retirement. On May 30, 2017, Generation announced it would permanently cease generation operations at Three Mile Island Generating Station (TMI) in September</td>
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2019. The TMI nuclear plant did not clear in the May 2017 PJM capacity auction for the 2020-2021 planning year and will not receive capacity revenue for that period, the third consecutive year that TMI failed to clear the PJM base residual capacity auction. While attempts were made to advocate for Pennsylvania to pass legislation to better recognize the value of this zero carbon generation from nuclear, none such was approved in time to save the plant. The magnitude of the impact associated with the TMI retirement includes the loss of 100s of jobs, nearly 7 million MWh of zero carbon generation being supplied to the grid annually and economic benefit of those power sales to the company. In terms of GHG emissions, replacing the generation from TMI at the current grid emissions rate is equivalent to over 4 million metric tons of GHG emissions.

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<th>Relevance</th>
<th>Description</th>
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| Impacted   | Exelon Generation revenues have been both positively and negatively impacted by climate-related issues associated with the valuation of carbon in various markets. In May of 2017, Exelon announced the potential retirement of TMI nuclear power plant, in part because there is no federal or PA state program that financially recognizes the value of TMI's carbon-free nuclear generation. While the early retirement is also attributable to the low cost of natural gas, the TMI nuclear plant did not clear in the May 2018 PJM capacity auction for the 2021-2022 planning year and will not receive capacity revenue for that period, the fourth consecutive year that TMI failed to clear the PJM base residual capacity auction. The plant is currently committed to operate through September 2019. In 2018, as a result of the plant retirement decision of TMI, Exelon and Generation charges in Operating and maintenance expense of $32 million related to materials and supplies inventory reserve adjustments, employee-related costs and construction work-in-progress (CWIP) impairments, among other items. In addition to these one-time charges, there will be ongoing annual incremental non-cash charges to earnings stemming from shortening the expected economic useful life of TMI primarily related to accelerated depreciation of plant assets (including any asset retirement costs (ARC)), accelerated amortization of nuclear...
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<th>Topic</th>
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<tr>
<td>Operating costs</td>
<td>Not yet impacted</td>
<td>Exelon did not directly attribute any significant changes of Operating Costs this year to climate-related issues, although we recognize the potential for disruption is increasing as a result of climate-driven natural disasters or through experiencing shifts in weather extremes in the regions where we operate. Since climate change has been occurring over time, this is less of a step change and more of a gradual increase in risk of which we must be continually aware. We continue to work to incorporate climate change projections into our business planning as a means of mitigating or planning for these risks as a better understanding around the certainty of these projections develop. We are also working with the Independent System Operators (ISO) that manage the grids where we supply generation to ensure that we are meeting their Seasonal Readiness requirements for power plant availability. Exelon is also a founding member of the Electric Utility Sustainable Supply Chain Alliance. Through this and other supplier engagements, we have begun to assess and manage our supply chain risks associated with climate change. Through an annual supply chain survey, we are gathering information to better understand the energy and water dependencies and management strategies of our suppliers that could result in increased costs or unavailable products over time. Through the commodity standards developed by the organization, we are helping to educate and improve the environmental performance of our suppliers. We have also begun to request business continuity plans from our Tier 1 and critical suppliers to ensure they have plans in place to deal with unplanned business disruptions.</td>
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<tr>
<td>Capital expenditures / capital allocation</td>
<td>Impacted</td>
<td>Exelon invested $5.3 billion across its regulated utilities in 2018 and plans to invest approximately $23 billion in our utilities from 2019 through 2022. Most of Exelon’s utility investments over the next four years will be in the electric distribution system, followed by the electric transmission and gas distribution systems. Through December 2018, we upgraded more than 10 million smart electric and gas meters at the Exelon utilities. These advanced metering technologies enable a wide range of system and customer benefits. From an operational perspective, the metering system allows for increased efficiency and accuracy in the measurement of energy usage, which can help Exelon better manage its resources and provide more accurate billing to customers. Additionally, the system provides data that can be used for demand response programs, which can help Exelon manage peak load periods and reduce the stress on the energy grid.</td>
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These new meters allow the utilities to remotely connect or disconnect service, provide enhanced information to help identify and respond to power outages and better monitor circuit voltage, saving customers money and avoiding excess GHG emissions. At the same time, these technologies give customers real-time insights into their energy usage and opportunities to save energy and money. Due to the structure of our industry, Exelon's utilities are generally unable to directly invest in and own power generation resources. However, our utilities worked in other ways to enable renewable energy investment and deployment in our service territories by other parties, enabling almost 103,688 customers to connect 1,232 MW of local renewable generation to the emerging smart grid. Exelon Generation’s capital deployment through 2022 focuses primarily on investments that will support and improve our existing plants’ ability to generate electric power efficiently, cleanly and reliably. This focus is due to low market demand for new power generation resources, although through its customer program in 2018 Constellation did bring online nearly 30 MW of new distributed solar for a total of more than 484 MW of distributed energy assets in operation or under development for commercial and government customers in the United States.

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<tr>
<th>Acquisitions and divestments</th>
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<td>In October 2018, Constellation acquired PFMG Solar LLC on October 10, 2018. PFMG Solar develops solar power systems for school districts, government agencies and other public-sector customers. This purchase enables Constellation to grow its solar footprint in California, the most active U.S. solar market, and extend its Constellation Offsite Renewables (CORe), energy efficiency and other retail energy offerings to new markets. With respect to divestitures, in April 2018, four of the five Exelon Generation Texas Power (EGTP) gas-fired plants — Mountain Creek, Wolf Hollow I, Colorado Bend I and LaPorte — were transferred to EGTP’s lenders pursuant to a voluntary bankruptcy filing. The divested natural gas generation units in Texas where not profitable because of specific ERCOT market challenges and the seasonality of cash flow in that region. While not all market changes are attributable to climate change, regionally specific increasing demand for renewables and low carbon fuels, as well as shifts in demand, are a likely contributor to the market shifts that led to Exelon’s acquisitions and divestitures.</td>
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<th>Access to capital</th>
<th>Not yet impacted</th>
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<td>At this time, Exelon’s low carbon fleet has not yet been impacted by climate-related risks, however, Exelon recognizes that elements that do determine our ease of access to capital could be negatively affected by climate change issues now and into the future. Exelon relies on the capital markets, particularly for publicly offered debt, as well as the banking and commercial paper markets, to meet their financial commitments and short-term liquidity needs if internal funds are not available from our own operations. Disruptions in the capital</td>
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and credit markets in the United States or abroad could adversely affect Exelon’s ability to access the capital markets or draw on their respective bank revolving credit facilities. The inability to access capital markets or credit facilities, and longer-term disruptions in the capital and credit markets as a result of uncertainty, changing or increased regulation, reduced alternatives or failures of significant financial institutions could result in the deferral of discretionary capital expenditures, changes to Generation’s hedging strategy in order to reduce collateral posting requirements, or a reduction in dividend payments or other discretionary uses of cash. Further, generation’s business is subject to credit quality standards that could require market participants to post collateral for their obligations. If Generation were to be downgraded or lose its investment grade credit rating (based on its senior unsecured debt rating) or otherwise fail to satisfy the credit standards of trading counterparties, it would be required under its hedging arrangements to provide collateral in the form of letters of credit or cash, which could have a material adverse effect upon its liquidity. The amount of collateral required to be provided by Generation at any point in time depends on a variety of factors, including (1) the notional amount of the applicable hedge, (2) the nature of counterparty and related agreements, and (3) changes in power or other commodity prices – each of which could be impacted by climate change or climate change regulation. In addition, if Generation's investment rating were downgraded, it could experience higher borrowing costs as a result. Generation could experience a downgrade in its ratings if any of the credit rating agencies concludes that the level of business or financial risk has deteriorated.

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<th>Assets</th>
<th>Impacted for some suppliers, facilities, or product lines</th>
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<td>Exelon has experienced localized impacts to assets due to climate change-related issues such as increased storm frequency and intensity. Exelon has also begun to experience increased consideration of future sea level rise or flood risks associated with the siting of new equipment. The timing and magnitude of these impacts is dependent on the asset, location, storm conditions and if equipment replacement or upgrade can be captured under existing rate base agreements with the utilities public utility commission. Having to raise or upgrade the capacity of an asset will add cost to a project, as well as potentially increase the typical permitting time. Exelon invested $5.3 billion across its regulated utilities in 2018 and plans to invest approximately $23 billion in our utilities from 2019 through 2022 on building utility system reliability and resiliency to potentially reduce these potential impacts.</td>
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<tr>
<th>Liabilities</th>
<th>Not yet impacted</th>
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<td>At this time, Exelon's liabilities have not been impacted by climate related issues, however, we do recognize that climate change-related issues such as increased storm frequency and intensity could have an impact to our own assets or the transmission systems support our assets, such that we can either not deliver power as</td>
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we are required to do or such that operational failure of electric or gas systems, generation facilities or infrastructure could result in potential liability if such failure results in damage to property or injury to individuals. The timing and magnitude of that impact would be dependent on the event and the extent to which services were disrupted. We continue to work in incorporate climate change projections into our business planning as a means of mitigating or planning for these risks.

| Other       | Not evaluated | Not Applicable |

**C3. Business Strategy**

**C3.1**

*(C3.1) Are climate-related issues integrated into your business strategy?*

Yes

**C3.1a**

*(C3.1a) Does your organization use climate-related scenario analysis to inform your business strategy?*

Yes, qualitative

*C-AC3.1b/C-CE3.1b/C-CH3.1b/C-CO3.1b/C-EU3.1b/C-FB3.1b/C-MM3.1b/C-OG3.1b/C-PF3.1b/C-ST3.1b/C-TO3.1b/C-TS3.1b*

*(C-AC3.1b/C-CE3.1b/C-CH3.1b/C-CO3.1b/C-EU3.1b/C-FB3.1b/C-MM3.1b/C-OG3.1b/C-PF3.1b/C-ST3.1b/C-TO3.1b/C-TS3.1b) Indicate whether your organization has developed a low-carbon transition plan to support the long-term business strategy.*

Yes
C3.1c

(C3.1c) Explain how climate-related issues are integrated into your business objectives and strategy.

i. (and iv.) Exelon’s business strategy is influenced by regular assessment of the key trends affecting the electricity industry and evolves over time to ensure that we anticipate the needs of our customers and continue to deliver the energy products, services, results and value that matters to them. We see the electric industry transforming due to fundamental shifts in energy markets and customer expectations, new technologies and evolving public priorities. The four key focus areas of our business plan include embracing a culture of technology and innovation; prudent investment; operational excellence; and advocacy for appropriate regulatory and market structures – all of which tie to our corporate policy, program and goals relating to GHG management and climate change resiliency.

As we execute our strategy, we ensure we are meeting customers’ interests and remaining relevant in this changing environment, including consideration of affordable energy, reliable electric and gas service, clean/low-carbon energy, technology and innovation, and investment in people and local community resilience. Business examples include our Constellation Energy Solutions branch that focuses on distributed energy systems (solar and biofuels), our CNE retail branch that developed the CORe product to increase accessibility to purchasing renewable energy through contracts, and our Generation company’s involvement in the 50-MW Net Power plant in LaPorte, TX to demonstrate a new turbine-driven power generation technology without producing atmospheric emissions (initial pilot operation phase in 2018).

Our continued investment in affordable, reliable, low-carbon distribution systems is another example of how our business strategy has been influenced by climate change and related key industry trends. This investment includes plans to invest approximately $23 billion in our utilities from 2019 through 2022 to enhance electric system resilience and reliability, as well as investment in ongoing customer energy efficiency programs which raises customer awareness and control of energy use; piloting new technologies, like microgrids and batteries, that can help with climate change resiliency and integration of renewables; and construction of high efficiency generation which has the potential to reduce overall grid carbon emissions and assist with renewable integration. Specific pilot program examples include ComEd’s proposal to construct one of the first utility-scale microgrid clusters in the nation in the Bronzeville neighborhood of Chicago, and Pepco’s two public purpose microgrids proposed in Maryland.

ii. Exelon recognizes global climate change as a significant issue and that the electric industry has a unique opportunity to create business value while transitioning the US to a clean energy future. We recognize our business can play a key role in reducing emissions, directly and through our customers and accordingly we set internal business targets around clean generation production that support attainment of these goals. The need to reduce GHG emission has influenced our business strategy to seek opportunities within our own operations (such as accelerated pipe replacements to reduce
m ethane emissions from our natural gas distribution systems, and increased energy efficiency in our buildings and fleet vehicles) and across the energy value chain (such as our award winning customer energy efficiency programs being implemented by all of our utilities, or our annual goals for clean generation production) that can create business value while reducing GHG emissions and/or preparing for climate resiliency.

iii. Constellation’s acquisition of PFMG Solar LLC in 2018 is one of the most significant business decisions made last year as a result of integrating climate-related issues into our business strategy. Constellation’s acquisition of PFMG Solar LLC on October 10, 2018. PFMG Solar develops solar power systems for school districts, government agencies and other public-sector customers. This purchase enables Constellation to grow its solar footprint in California, the most active U.S. solar market, and extend its Constellation Offsite Renewables (C0Re), energy efficiency and other retail energy offerings to new markets. This business decision was influenced by our customers interest in taking action on climate change through the expansion of zero carbon renewable generation to reduce GHG emissions. Related to this same climate change aspect, Constellation has also expanded there offering to customers for the retirement of emissions free energy credits (EFECs) associated with nuclear power, to similar help support the extension of these zero-carbon generation units.

v. The most important components of our short-term strategy are our investments in new and existing clean energy generation and our advocacy efforts for appropriate regulatory and market structures that can allow for the transition to a clean energy economy. Examples include our policy work in IL, NJ, NY and PA to prevent early retirement of nuclear generation and to consider additional energy efficiency and renewable energy measures in several of these states. Our advocacy efforts also support market value for all low-carbon energy in all forums which has the potential to increase new clean generation, but also preserve the existing clean generation already foundational to US GHG performance. These components of our short-term strategy are supported and directly relate to our annual GHG targets for new clean energy development (40 MW of distributed solar, and 15 MW of nuclear uprates in 2018) and for best-in-class performance of our existing clean energy assets (94% capacity factor for nuclear and 95% capture efficiency for wind and solar) which avoided over 90 million metric tons of GHG emissions in 2018.

vi. The most important components of our long-term strategy influenced by climate change is our increased focus on new technologies and innovation. As our industry transforms, Exelon is focused on evolving its business models and regulatory frameworks to keep pace with this transformation to ensure that our utilities can continue to deliver value to our customers. We envision a future energy system that is more distributed and decentralized. The system will offer more choice for customers and will be increasingly transactional, as more people exchange information, products and services through the grid. We aspire to transform our business model to this vision of "Connected Communities", the policy framework that supports it and our physical and digital infrastructure to create our vision of connected communities in support of a clean energy future. As a component of this, we are also evaluating economy wide and sectoral scenarios related to meeting the international 2-degree Celsius target for 2050, as well as physical climate risks associated with failure to achieve the needed GHG reductions.
C3.1d

(C3.1d) Provide details of your organization’s use of climate-related scenario analysis.

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<th>Climate-related scenarios</th>
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<tr>
<td>DDPP</td>
<td>Because Exelon is a low carbon energy company focused on providing low carbon energy solutions to its customers and communities, we have begun to use climate-related scenarios in our business planning. Building on our initial analysis in 2017 which used the Science-based Targets Initiatives (SbTI) Sector Decarbonization Model, which is based on the IEA Energy Technology Perspectives (2014) 2-degree scenario work, in 2018 Exelon expanded its effort to commence an analysis based on the US Deep Decarbonization Pathway Project (USDDPP). We chose this analysis because it is a U.S. study across the whole economy and takes into account all energy use by all sectors, while still remaining focused on limiting global temperature increase to 2-degree through 2050. The U.S.DDPP shows several possible energy system transitions that could lead to the US reaching an 80% reduction in GHG emissions by 2050, which included an analysis of what actions and types of fuel switching might need to occur in each sector to reach this goal. Exelon is considering potential implications of such dramatic changes across all sectors to its current business profile to better understand how its various business elements might be affected. Exelon’s analysis is ongoing. We are focusing on the general trends (scope and scale) of the transition pathways. One conclusion to this analysis to date, is that there are many different pathways to achieve the necessary emission reductions. All pathways require broad suites of actions and consideration of the relative trade-offs and implications that arise with the use of different technologies or approaches. Across all potential solution pathways, we see the following common elements: An 80% reduction in GHG emissions is possible by 2050 only with efficient electrification backed by zero-carbon electric generation, significant action is needed throughout the economy immediately, with sustained progress through mid-century; All current commercially viable supply and demand mitigation options need to be deployed and potential future options need to be developed; Routine equipment replacement cycles are key opportunities for taking advantage of available new technologies at lower cost, and coordinated approaches that recognize these opportunities are needed to drive investment for this transition; the cost of inaction on climate change far exceeds the cost of action; while the need to act is urgent, there are trade-offs to all solutions that must be carefully weighed in making decisions on the scale required to transition the economy; and that timely, meaningful and effective policy measures are an imperative. All of these findings re-enforce Exelon’s engagement in identifying and pursuing electrification opportunities for customers as part of its...</td>
</tr>
</tbody>
</table>
median and long-term business strategy through its TechEXChange, R&D investments, Excellorate Growth Board programs like EZ-EV and Constellation Technology Ventures (CTV) investments in Proterra electric buses and XL’s work on electric pick-up trucks. It also spurs our Constellation groups focus on its distributed renewable generation program for customers and new environmental attribute products (RECs and EFECs) that support success of zero-carbon renewables and nuclear on the grid. This analysis also made it clear that the avoided emissions from our nuclear generation are a critical part of a successful 2-degree solution and has informed and supported our short-term business strategy by increasing the importance around advocacy to support legislation and/or market reform that can prevent pre-mature retirement of nuclear units. As one example of our work to promote a sensible national approach to mitigating climate change, in 2018, Exelon joined the Climate Leadership Council (CLC) as a founding member. The objective of the CLC is to implement a national carbon dividend system to meaningfully reduce nationwide emissions while protecting the most vulnerable citizens.

| RCP 8.5 | Exelon also began to look at the physical climate change data available from the RCP8.5 high emissions scenario. We selected this scenario for physical climate change conditions because it is the trend that the globe is currently on, and because the physical changes noted for our region are similar through 2050 for this and the lower emission scenarios. From the review, we recognized that the larger divergence in the physical changes occurs after the 2050 time period depending on whether emissions are reduced in the near term. Exelon is still in the process of analyzing how to best use these temperature, precipitation and storm frequency and intensity trends more directly in its business planning and risk assessment procedures. This analysis has re-enforced our corporate commitment to participate in the U.S. DOE Partnership for Electric Sector Climate Resilience. Through the Partnership, we collaborated to develop a maturity model for the attributes of a resilient utility and are using this document to advance our climate change resilience planning efforts. We are working with NOAA and others to improve the accessibility of our industry pertinent data, and to better capture the specific elements of climate change projections that relate to our planning processes, recognizing that climate change may affect different parts of our business in different ways. We continue to explore opportunities to increase climate change training and communication efforts, increase climate change awareness in planning and improve coordination with local organizations working on climate adaptation and resilience plans. |

**C-AC3.1e/C-CE3.1e/C-CH3.1e/C-CO3.1e/C-EU3.1e/C-FB3.1e/C-MM3.1e/C-OG3.1e/C-PF3.1e/C-ST3.1e/C-TO3.1e/C-TS3.1e**

(C-AC3.1e/C-CE3.1e/C-CH3.1e/C-CO3.1e/C-EU3.1e/C-FB3.1e/C-MM3.1e/C-OG3.1e/C-PF3.1e/C-ST3.1e/C-TO3.1e/C-TS3.1e) Disclose details of your organization’s low-carbon transition plan.
Because Exelon is already a low carbon energy company, our business strategy is our "transition plan", which as a foundational matter, pursues operational excellence and the delivery of clean, reliable and affordable power and low carbon solutions. As we look to the future, we are embracing innovation, technology and new business models to create cleaner connected communities for our customers that help to achieve needed GHG emission reductions and climate change resiliency. Exelon's current focus is on a vision of "connected communities" as a response to the changing role our utilities can play in creating value for customers and communities. Under this model, our utilities play a central role in enabling the power of digital communication, remote sensing, artificial intelligence, distributed energy resources and the platform of smart infrastructure to reinforce human connection and serve the hierarchy of community needs. We aspire to transform our business model, the policy framework that supports it and our physical and digital infrastructure to create our vision of connected communities. Exelon's public policy efforts focus on working with key stakeholders to implement market designs, policies and regulations that achieve a reliable, affordable and clean energy future for our customers and communities. Innovation, customer expectations and government policies inform the transition of our industry to the utility of the future. Exelon invested $5.3 billion across its regulated utilities in 2018 and plans to invest approximately $23 billion in our utilities from 2019 through 2022 associated with efforts to strengthen our distribution systems and make them more capable of supporting new and distributed technologies key to a transition to a low carbon future. We also continue to focus on maintaining the financial viability of its nuclear fleet and optimizing the amount of clean generation produced by its nuclear, wind and solar facilities, as well as an intense focus on innovation and understanding of new and emerging technologies to ensure we are on a path to evolve as needed to maintain our low carbon leadership role into the future. Exelon will also continue to explore the use of climate change scenario analysis as a means to continually inform our ongoing evolution of our business and strategic planning efforts.

C4. Targets and performance

C4.1

(C4.1) Did you have an emissions target that was active in the reporting year?

Absolute target

C4.1a

(C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.
Target reference number
  Abs 1

Scope
  Other, please specify
    Scope 1 & 2 Controllable Operations

% emissions in Scope
  100

Targeted % reduction from base year
  15

Base year
  2015

Start year
  2017

Base year emissions covered by target (metric tons CO2e)
  1,133,000

Target year
  2022

Is this a science-based target?
  Yes, we consider this a science-based target, but this target has not been approved as science-based by the Science-Based Targets initiative

% of target achieved
  66

Target status
  Underway
Please explain

Exelon established this third generation GHG goal in 2017 to reduce 100% of its emissions from internal operations (emissions controllable by our employees and processes) 15% from a 2015 baseline by 2022 (2.2% reduction per year). This progress will be despite new equipment coming online due to business growth expected in 2018. The actual public facing goal is on Market-driven emissions, allowing for use of clean energy purchases to be part of performance, but per CDP requirements, the goal is being reported here based on location-based emissions. Emissions sources covered by this goal include all building and support equipment electricity uses, emergency and auxiliary stationary combustion sources, fleet vehicles, natural gas distribution systems, SF6 electrical insulated equipment, and refrigerant sources. Emissions not included in this goal are those we own, but do not have direct control over how they operate. These emission sources include our Scope 1 emissions from electric generation since the level of operation for these units is determined by grid demand for electricity and resulting plant dispatch as determined by the grid balancing authority (outside of our full operational control since we have a commitment to the grid to be available as needed to meet demand); and Scope 2 emissions associated with transmission and distribution line losses since these emissions are primarily driven by the volume of electricity required to be delivered to utility customers (similarly outside of our full day-to-day operational control since we have a commitment to the public utility commissions to deliver power as needed). It should be noted, that for these other sources, Exelon does maintain performance management indicators (lbs/MWh generated and % loss of MWh delivered) to ensure a continued focus on GHG emissions and to capture the impacts of the GHG emission reduction efforts being implemented. Looking across these three areas, Exelon ensures ongoing management of emissions across 100% of our GHG inventory. Base year emissions for the goal were adjusted to account for the acquisition of Fitzpatrick Nuclear Plant in 2017, as well as the divestiture of Mountain Creek, LaPorte, Colorado Bend I and Wolf Hollow I in 2018.

C4.2

(C4.2) Provide details of other key climate-related targets not already reported in question C4.1/a/b.

<table>
<thead>
<tr>
<th>Target</th>
<th>KPI – Metric numerator</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy productivity</td>
<td>MWh of zero-carbon generation produced</td>
</tr>
</tbody>
</table>
KPI – Metric denominator (intensity targets only)

Possible MWh of zero-carbon generation that we could produce

Base year
2018

Start year
2018

Target year
2018

KPI in baseline year
93.91

KPI in target year
94.58

% achieved in reporting year
100

Target Status
Achieved

Please explain

The KPI that Exelon maintains which is tied to executive compensation associated with low carbon initiatives is on the capacity factor of our Nuclear generation stations and the capture rates of our wind and solar facilities, both of which ensure we maximize the amount of zero carbon generation that we provide to the grid. Through the achievement of our nuclear capacity factor alone (as shown above), at an amount higher than the baseline and at a new fleet record for the company, we avoided an estimated 84.7 million metric tons of GHG emissions (had the same volume of nuclear generation been produced by the current grid mix). By maximizing our clean generation, we can continue to maintain our generation CO2 emissions intensity rate for grid supplied electricity nearly 90% lower than the industry average. In fact, Exelon’s current generation emissions intensity (100 lbs/MWh in 2018) already nearly meets the industry 2DS 2050 target. Through our zero carbon generation
production targets, Exelon also supports additionality of new zero carbon generation on the grid by maintaining the current level of zero carbon
generation which is key to continuing to drive reductions in grid emissions intensity over time. Exelon’s internal goals are specifically focused
on the capacity factor of our units and is not expressed in a lbs/MWh intensity rate as we are not in control of the ultimate dispatch of our fossil
plants; however, the result of these related targets has the same affect. In addition, much of the GHG reductions associated with this target are
related to the emissions of the electric sector as a whole - which is even beyond what is considered our Scope 3 emissions, so it is difficult to
capture in terms associated with our own GHG inventory. Combined with our other two focus areas, this ensures then management of 100% of
our GHG inventory.

Part of emissions target
This KPI also ensures coverage of Scope 1 emissions from electric generation under our GHG management program. Exelon establishes
capacity factor targets each year to ensure top generation performance by our nuclear fleet (zero carbon-dioxide generating emissions), as well
as peak performance for our profile of renewable assets of wind and solar. This ensures that we maintain our generation emissions intensity
(lbs CO2/MWh produced) at its lowest possible rate. Exelon’s current generation emissions intensity already today meets the industry 2DS 2050
target. Exelon's internal goals are specifically focused on the capacity factor of our units and is not expressed in a lbs/MWh intensity rate as we
are not in control of the ultimate dispatch of our fossil plants (which is ultimately determined by the grid balancing authority to meet needed
demand); however, the result of these related targets has the same affect. In addition, much of the GHG reductions associated with this target
are related to the emissions of the electric sector as a whole - which is even beyond what is considered our Scope 3 emissions, so it is difficult
to capture in terms associated with our own GHG inventory; however, it can be seen as supporting US goals, such as that originally set as the
US INDC under the Paris Accord.

Is this target part of an overarching initiative?
Other, please specify
Original US Paris Accord INDC

Target
Energy usage

KPI – Metric numerator
MWh line losses
KPI – Metric denominator (intensity targets only)
MWh delivered

Base year
2016

Start year
2018

Target year
2018

KPI in baseline year
7.2

KPI in target year
6.3

% achieved in reporting year
100

Target Status
Achieved

Please explain
The actual performance metric that Exelon maintains is on the MWh of electricity lost per MWh of electricity delivered (also known as % line losses). The MWh of electricity lost in the process of delivering our customers electricity demand is volume used to calculate our same Scope 2 emissions from Transmission and Distribution (T&D) line losses. Coming in under the target is preferred. This metric is not established as a formal goal because ultimate line losses are dependent upon the particulars of load and demand on the grid, as well as temperature and grid congestion. Exelon invested $5.3 billion across its regulated utilities in 2018 and plans to invest approximately $23 billion in our utilities from 2019 through 2022 with the intent to improve grid reliability, resiliency and efficiency. This
metric will now help to measure the direct impact of those investments on Scope 2 emissions associated with line losses. Combined with our other two focus areas, this ensures then management of 100% of our GHG inventory.

**Part of emissions target**
This KPI also ensures coverage of Scope 2 emissions from our utilities distributions systems under our GHG management program such that 100% of our emissions are being managed. Minimizing these losses also lessen demand on the grid and supports reduce emissions at the national level for the electric sector, directly supporting US performance toward its original INDC under the Paris Accord.

**Is this target part of an overarching initiative?**
Other, please specify
Original US Paris Accord INDC

---

**Target**
Methane reduction target

**KPI – Metric numerator**
Miles of Cast iron and unprotected steel pipe mains in the current year

**KPI – Metric denominator (intensity targets only)**
Total miles of Cast iron and unprotected steel pipe mains on system in the base year

**Base year**
2015

**Start year**
2016

**Target year**
2021

**KPI in baseline year**
KPI in target year
0.84

% achieved in reporting year
63

Target Status
Underway

Please explain
This performance indicator is related to Exelon’s participation in the EPA Methane Challenge where our formal goal is to remove more than 2% per year of cast iron and unprotected steel mains from our natural gas distribution systems from 2017 through 2021. Replacing cast iron mains with plastic material can reduce fugitive methane emissions from this pipe systems by nearly 95%. The KPI is the ratio of cast iron and unprotected steel main pipeline miles in the current year as compared to the base year. The ratio target shown is equivalent to the ratio of cast iron and unprotected steel mains if we are successful in replacing 2.2% per year through 2021.

Part of emissions target
This performance indicator is part of the ABS1 goal shown above.

Is this target part of an overarching initiative?
Reduce short-lived climate pollutants

C-OG4.2a

(C-OG4.2a) If you do not have a methane-specific emissions reduction target for your oil and gas activities or do not incorporate methane into your target(s) reported in C4.2 please explain why not and forecast how your methane emissions will change over the next five years.

We do have a specific methane target reported in C4.2.
C4.3

(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Yes

C4.3a

(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

<table>
<thead>
<tr>
<th>Initiative Type</th>
<th>Number of Initiatives</th>
<th>Total Estimated Annual CO2e Savings in Metric Tonnes CO2e (only for rows marked *)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under investigation</td>
<td>38</td>
<td></td>
</tr>
<tr>
<td>To be implemented*</td>
<td>47</td>
<td>4,867,942</td>
</tr>
<tr>
<td>Implementation commenced*</td>
<td>45</td>
<td>4,824,213</td>
</tr>
<tr>
<td>Implemented*</td>
<td>83</td>
<td>3,859,980</td>
</tr>
<tr>
<td>Not to be implemented</td>
<td>2</td>
<td></td>
</tr>
</tbody>
</table>

C4.3b

(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.

<table>
<thead>
<tr>
<th>Initiative Type</th>
<th>Description of Initiative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fugitive emissions reductions</td>
<td>Oil/natural gas methane leak capture/prevention</td>
</tr>
</tbody>
</table>
**Estimated annual CO2e savings (metric tonnes CO2e)**
- 21,610

**Scope**
- Scope 1

**Voluntary/Mandatory**
- Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**
- 453,000

**Investment required (unit currency – as specified in C0.4)**
- 238,000,000

**Payback period**
- <1 year

**Estimated lifetime of the initiative**
- 21-30 years

**Comment**
BGE, Delmarva and PECO repair and pro-actively replace and upgrade their system to ensure and improve operations. Converting from cast iron piping to plastic can reduce methane emissions by 95%. All three utilities are long time members of the EPA’s Natural Gas Star program and in April 2016 committed to the Methane Reduction Challenge - establishing a goal to replace cast iron and unprotected steel mains in the system at a minimum rate of 2% per year through 2021. Performance against this goal has continued to be strong, with 101.7 miles of cast iron main and 17.3 miles of unprotected steel replaced (nearly 5%) in 2018. This effort is counted as 3 projects implemented (relating one each to BGE, Delmarva and PECO), with a similar 3 projects to be implemented in 2019, under question 4.3a, as well as towards performance under 4.1a Abs1 and 4.2 KPI for methane emissions. Emissions, investment and cost savings which are provided are related to the 2018 pipe cast iron and unprotected steel pipe replacement projects implemented at BGE, Delmarva and PECO combined. Cost has been estimated based on approximately $2 million per mile replaced. Actual cost may differ depending on actual project location and circumstances. As investment...
benefits are beyond GHG emissions reductions and include performance and safety improvement, simple ROI analysis is not appropriate for this initiative.

---

**Initiative type**
Low-carbon energy installation

**Description of initiative**
Solar PV

**Estimated annual CO2e savings (metric tonnes CO2e)**
20,123

**Scope**
Scope 1

**Voluntary/Mandatory**
Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**
6,781

**Investment required (unit currency – as specified in C0.4)**
0

**Payback period**
4 - 10 years

**Estimated lifetime of the initiative**
21-30 years

**Comment**
In 2018, Exelon completed construction of 29.5 MW of new distributed solar generation development. Emissions reductions shown are estimated avoided annual fossil generation as a result of the new solar generation installed in 2018 over the course of a year at a 20% capture efficiency (prior to any RECs that may be sold). Actual MWh produced and emissions avoided will vary based on site specific considerations. This new renewable capacity (MW) does count toward our annual clean energy performance target established each year expressed as an intensity rate (INT1) under 4.1b, and relates to electric grid level emission reductions, and helps to minimize our Scope 1 generation emissions by increasing the zero-carbon generation available to our customers. Savings are based on the MWh generated at the national average cost for electricity. Investment is $0 as most systems are customer owned. Payback is estimated and may vary based on project size and location. This is counted as 46 actions implemented in 4.3a.

<table>
<thead>
<tr>
<th>Initiative type</th>
<th>Fugitive emissions reductions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description of initiative</td>
<td>Other, please specify</td>
</tr>
<tr>
<td></td>
<td>SF6 emissions reduction</td>
</tr>
</tbody>
</table>

**Estimated annual CO2e savings (metric tonnes CO2e)**
14,367

**Scope**
Scope 1

**Voluntary/Mandatory**
Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**
10,872

**Investment required (unit currency – as specified in C0.4)**
4,550,000
Payback period
<1 year

Estimated lifetime of the initiative
21-30 years

Comment
Exelon experiences SF6 leakage from high voltage electrical equipment that it operates on its utilities’ transmission and distribution systems. As an early member of the EPA Partnership for SF6 Reduction, Exelon’s utilities have invested significantly in SF6 leak reduction programs, which include advanced leak detection, improved material tracking, targeted repairs and replacements and equipment upgrades. ComEd, BGE, PECO, ACE, Delmarva and PEPCO continue to reduce SF6 releases through early leak detection, prioritization of leak repairs and replacement of aging SF6 breakers. PECO completed the replacement of 13 first-generation SF6 breakers in 2018, with 22 dual pressure breakers remaining. Emissions reductions presented are based on the 5-year average SF6 leakage as recorded from the breakers that were replaced, although actual system fugitive emissions will be dependent upon many factors, including weather. Annual savings relates to the cost to replace average historical leaked volume from the switch gear that has been replaced. Financial investment information is approximate and estimated based on an average replacement cost per breaker, as these efforts were combined with larger system system performance improvements. Pay back is not appropriate as the project encompasses greater reliability benefits as well. This is accounted for as 6 projects implemented under 4.3a, one for each utility, and directly relates to our GHG reduction goal as described in 4.1a Abs1.

Initiative type
Low-carbon energy purchase

Description of initiative
Wind

Estimated annual CO2e savings (metric tonnes CO2e)
77,000

Scope
Scope 2 (market-based)
Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
0

Investment required (unit currency – as specified in C0.4)
5,832

Payback period
No payback

Estimated lifetime of the initiative
<1 year

Comment
Exelon also offsets indirect emissions from its own electricity use through the retirement of renewable energy credits (RECs) and emissions free energy credits (EFECs) to support our net GHG annual target. In 2018, we retired an additional 145,000 MWhs more clean energy attributes towards our goal than we did in 2017. REC certificates purchased are Green-e Certified, which insures they are sourced in the United States, and are retired in support of BSC, ComEd and PECO’s Leadership in Energy and Environmental Design (LEED) building initiatives. EFECs are from PJM ISO, where these zero emission nuclear attributes are similarly tracked and retired by certificate number. These clean energy attributes are currently used in our market-based accounting view of our Scope 2 emissions as described in our GHG goal description outlined in 4.1a (Abs 1). Because these RECs were purchased through multi-year contracts, annual cost has been estimated based on an average cost of $1.65/MWh REC, and only represents the additional RECs purchased beyond that purchased for the prior year. The value of EFECs is not reflected, as we are currently able to retire EFECs from our nuclear generation stations at no cost. Similarly, emissions reductions shown are just those associated with the volume of RECs and EFECs beyond what was purchased the previous year. There is no savings or payback associated with the purchase of RECs. This is counted as 3 actions implemented in 4.3a.

Initiative type
Low-carbon energy purchase
Description of initiative
Wind

Estimated annual CO2e savings (metric tonnes CO2e)
1,681,950

Scope
Scope 3

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
0

Investment required (unit currency – as specified in C0.4)
0

Payback period
<1 year

Estimated lifetime of the initiative
<1 year

Comment
Exelon’s Constellation Retail organization markets RECs for voluntary carbon emissions offset and investment by individuals, private and public organizations. Their efforts resulted in the sale of over 3.2 million MWh’s worth of RECs for voluntary retirement in 2018, equivalent to approximately 1.7 million metric tonnes of avoided CO2e. These avoided emissions are Exelon’s Scope 3 emissions associated with our customer’s use of the products we provide. Annual monetary savings is not applicable to the category. Investment would be that of our customers. There would be no financial payback associated with REC purchases. This is accounted for as one action implemented in 4.3a
**Initiative type**

Other, please specify  
Employee Engagement Behavioral Changes

**Description of initiative**

**Estimated annual CO2e savings (metric tonnes CO2e)**

120

**Scope**

Scope 3

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

0

**Investment required (unit currency – as specified in C0.4)**

15,000

**Payback period**

No payback

**Estimated lifetime of the initiative**

<1 year

**Comment**

Exelon encourages behavioral changes which reduce GHG emissions through its employee engagement programs. These are Scope 3 emissions reductions that are critical to maintaining employee engagement, influencing how employees do their jobs, and further causing broader sustainable lifestyle changes. Programs include the promotion of energy efficiency at home, low impact vegetation management, wildlife appreciation, increased recycling (office and industrial) and a reduction in overall waste generation. Our grass-roots Eco-Team runs an
annual ECO-challenge, a week-long event where employees across the corporation are challenged to make life style changes that result in GHG footprint reductions and the Eco-Warrior Challenge where employees are challenged to see how many carbon-reducing activities they can achieve in one day. Activities are translated into GHG reductions, and increase awareness of the collective impact our employees can have on improving the environment through simple changes in their behavior. Emissions savings as presented are the project based Scope 3 reductions estimated for our Eco-Team employee events. These initiatives are voluntary and run from year to year. Investment relates to annual seed funding provided by Exelon to the EcoTeams. There are no corporate cost savings associated with these actions. Payback on the initiative is immediate with regard to employee engagement benefits. This is counted as one project implemented under 4.3a.

<table>
<thead>
<tr>
<th>Initiative type</th>
<th>Low-carbon energy purchase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description of initiative</td>
<td>Other, please specify</td>
</tr>
<tr>
<td></td>
<td>RPS Renewable Purchases</td>
</tr>
<tr>
<td>Estimated annual CO2e savings (metric tonnes CO2e)</td>
<td>1,458,337</td>
</tr>
<tr>
<td>Scope</td>
<td>Scope 3</td>
</tr>
<tr>
<td>Voluntary/Mandatory</td>
<td>Mandatory</td>
</tr>
<tr>
<td>Annual monetary savings (unit currency – as specified in C0.4)</td>
<td>0</td>
</tr>
<tr>
<td>Investment required (unit currency – as specified in C0.4)</td>
<td>0</td>
</tr>
<tr>
<td>Payback period</td>
<td></td>
</tr>
</tbody>
</table>
Estimated lifetime of the initiative
<1 year

Comment
Exelon's Utilities and Constellation purchase Renewable Energy Credits to add renewable electricity to that which they deliver to their customers per state Renewable Portfolio Standards (RPS). In 2018, BGE purchased approximately 20,993 MD Tier 1 RECs, ComEd purchased 1.29 million IL Wind and Solar RECs, and PECO purchased 8,272 solar and wind RECs. In addition, the PHI utilities retired a total of 2.18 million RECs for ACE, Delmarva and PEPCO combined. These RECs are procured on behalf of Exelon's customers in accordance with the state portfolio supply statutory requirements. Emissions reductions are Scope 3 and can be attributed to cleaner energy being used (or supported) by our customers. Estimated annual CO2e savings relate to the avoided emissions associated with these MWhs. These RECs are associated with the year they are retired, although as they encourage the clean energy market, they help to promote new renewable generation which can become a permanent emission reduction. There is no investment by the Utility as costs are passed through to the customer in accordance with their local utility specific rate case agreement. Payback is considered immediate because this is part of a compliance program. This is counted as 6 initiatives implemented each year (as each of our six utilities comply with their state programs separately).

Initiative type
Energy efficiency: Processes

Description of initiative
Other, please specify
Customer Energy Efficiency Programs

Estimated annual CO2e savings (metric tonnes CO2e)
1,525,898

Scope
Scope 3
Voluntary/Mandatory
Mandatory

Annual monetary savings (unit currency – as specified in C0.4)
430,265,539

Investment required (unit currency – as specified in C0.4)
545,000,000

Payback period
4 - 10 years

Estimated lifetime of the initiative
6-10 years

Comment
Exelon’s delivery companies — BGE, ComEd, PECO, Delmarva, and PEPCO—each implement a portfolio of leading-edge energy efficiency and demand response programs that help our customers reduce their energy consumption. This reduced energy use translates to reduced Scope 2 emissions for Exelon’s customers, which is a reduction in Scope 3 emissions for Exelon. These emissions reductions are driven by state public statutes that outline requirements for energy efficiency programs for utilities; however, Exelon utilities have been recognized by ENERGY STAR® Partner of the Year Awards from the EPA for their exemplary implementation year over year. The emissions reductions shown are for new activities implemented in 2018, although additional reductions are present as a result of efforts implemented in previous years that continue to reduce use. Customer bill savings as presented is based on an average rate of $0.118/KWh, based solely on 2018 MWh savings, and do not include rebates issued. The investment is estimated for initiatives implemented in 2018 across all Exelon utilities. While not quantified, Exelon utilities may also see savings through avoided maintenance/need for expansion as related to our delivery system. These are public service programs under which we operate, therefore specific pay back does not directly apply, although a typical payback for the types of actions included has been provided. This is counted as 6 projects implemented (one for each utility).

Initiative type
Energy efficiency: Processes
Description of initiative
Other, please specify
Retail Customer Energy Efficiency

Estimated annual CO2e savings (metric tonnes CO2e)
63,526

Scope
Scope 3

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
12,671,366

Investment required (unit currency – as specified in C0.4)
0

Payback period
4 - 10 years

Estimated lifetime of the initiative
6-10 years

Comment
Exelon’s Constellation Energy Solutions and BGE Home organizations works with customers to develop cost effective energy efficiency projects that help to drive down their electricity and natural gas use. These projects are voluntary and result in reductions of our Scope 3 emissions (Scope 1 and 2 emissions of our customers) that last for the life of the more efficient equipment or home improvements (which varies based on the project). These GHG abatement activities are based on Constellation Efficiency-Made-Easy program and their Performance-Based Projects which combined are estimated to have saved over 105,000 MWh of electricity and just over 1 million therms of natural gas in 2018. Emissions avoided are based on regional emission factors. Annual monetary savings would be that of our customers and was based on an average cost
of electricity of 0.118$/kwh and an average cost of natural gas of $7.89/mscf. Investment would also be that of our customers and does not apply to Exelon. Payback is representative of a typical threshold; the actual payback period would vary based on project type. This is accounted for as one action implemented in 4.3a.

<table>
<thead>
<tr>
<th>Initiative type</th>
<th>Energy efficiency: Building services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description of initiative</td>
<td>Other, please specify</td>
</tr>
<tr>
<td></td>
<td>Space consolidation and maintaining LEED Certifications</td>
</tr>
<tr>
<td>Estimated annual CO2e savings (metric tonnes CO2e)</td>
<td>9,422</td>
</tr>
<tr>
<td>Scope</td>
<td>Scope 2 (location-based)</td>
</tr>
<tr>
<td>Voluntary/Mandatory</td>
<td>Voluntary</td>
</tr>
<tr>
<td>Annual monetary savings (unit currency – as specified in C0.4)</td>
<td>500,000</td>
</tr>
<tr>
<td>Investment required (unit currency – as specified in C0.4)</td>
<td>0</td>
</tr>
<tr>
<td>Payback period</td>
<td>4 - 10 years</td>
</tr>
<tr>
<td>Estimated lifetime of the initiative</td>
<td>6-10 years</td>
</tr>
</tbody>
</table>
Comment
Exelon has 25 LEED certified buildings which it maintains to ensure continued optimal performance. In addition, Exelon is continually working to improve space use and consolidation operations and employees from older, less efficient spaces as possible. Our newest LEED certified corporate headquarters in Baltimore, has onsite solar generation, high efficiency building systems, high efficiency lighting and elevators and maximizes space and use of natural lighting for employees. The GHG savings is the differences in the emissions from building energy use from 2017 to 2018, and may capture some changes due to weather and/or grid emission rates. Savings is based on reduced MWh used for our commercial buildings from 2017 to 2018, assuming a cost of $0.118/kwh. Costs, savings and payback are not directly applicable for these projects as there were many other business considerations associated with the design and construction of these spaces. This is accounted for as 1 project implemented under 4.3a, one for each utility, and directly relates to our GHG reduction goal as described in 4.1a Abs1.

Initiative type
Other, please specify
Fleet Vehicle Electrification

Description of initiative

Estimated annual CO2e savings (metric tonnes CO2e)
3,100

Scope
Scope 1

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
384,970

Investment required (unit currency – as specified in C0.4)
Payback period
4 - 10 years

Estimated lifetime of the initiative
6-10 years

Comment
Exelon Utilities have committed to the EEI Electrification Challenge, where we have committed to spend at least 5 percent of our annual fleet acquisition budget on plug-in technology. In 2018, this resulted in the purchased of plug-in hybrid vehicles, battery electric vehicles, non-electric drive vehicles with plug-in technology, and both Level 2 chargers and DC Fast Chargers. GHG emissions reductions are based on idle avoidance equipment only, and represent the emissions difference as compared to this same equipment previously being run on diesel fuel. Actual emissions year over year depend on vehicle dispatch which may be impacted by system repair needs or storm recovery. These emissions reductions are directly tied to performance under the Operations-drive emissions target in 4.1a (Abs1). This accounts as four projects implemented under 4.3a (one for each participating Exelon utility). Total investment is for all vehicle electrification investment. Savings shown are associated with the difference between fuel costs associated with idle avoidance only, and do not reflect total costs of ownership that might be incurred over the vehicle equipment lifetime. Values reported are preliminary year end totals as summed across all Exelon utilities.

Initiative type
Low-carbon energy installation

Description of initiative
Other, please specify
Nuclear Uprate at Existing Plant

Estimated annual CO2e savings (metric tonnes CO2e)
134,083

Scope
Scope 1

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
0

Investment required (unit currency – as specified in C0.4)
1,400,000

Payback period
4 - 10 years

Estimated lifetime of the initiative
16-20 years

Comment
Exelon has been working to increase capacity at its existing nuclear power plants through equipment optimization and efficiency improvements. The result is increased carbon free emissions electrical base load generation that displaces fossil generation plants on the grid. In 2018, Exelon Nuclear completed uprates on Calvert Cliffs Unit 1, and Peach Bottom Units 1 & 2 by a total of 59 MW (29.5 MW at equity share). Exelon Generation has placed into service projects representing 575 MWs of new nuclear generation (uprates at existing plants) since 2008, resulting in over 4.5 million MWh annually, providing reliable energy, avoiding over 3.5 million mtCO2e and lessening the need for new plant construction. Estimated annual CO2e savings is based on fossil generation displaced by the new generation installed in 2018. This new nuclear capacity (MW) helps towards our emissions goals (ABS1 and Int1) by minimizing generation at our fossil plants. Savings is reported as zero since this initiative generates increased revenue for the corporation (not a savings). Investment is associated capital investment during 2018 only. Payback is based on expectations at the time of investment, and actual payback would be dependent on market prices and generation sales. This was counted as 3 projects implemented in 4.3a.

Initiative type
Low-carbon energy installation

**Description of initiative**
Natural Gas

**Estimated annual CO2e savings (metric tonnes CO2e)**
850,443

**Scope**
Scope 1

**Voluntary/Mandatory**
Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**
0

**Investment required (unit currency – as specified in C0.4)**
0

**Payback period**
<1 year

**Estimated lifetime of the initiative**
21-30 years

**Comment**
In 2018, Generation completed its first full year of commercial operations for its two new combined-cycle gas turbines (CCGTs) at the Colorado Bend II and Wolf Hollow II Generating Stations in Texas. The two new CCGTs have added nearly 2,200 MWs of capacity to Generation’s fleet, enhancing Generation’s strategy to match generation to customer load, support integration of renewables in the Texas electric grid system (ERCOT) and help reduce overall emissions of grid operations by displacing higher emitting generating sources. Generation invested approximately $1.5 billion over the past three years to complete the new plant construction, which utilizes new General Electric technology to make them among the cleanest, most efficient CCGTs in the nation. Estimated annual CO2e savings is based on higher emitting fossil
generation (ERCOT regional average) displaced by the new generation. While this initiative does not support our internal goals, this new capacity (MW) helps to achieve national and electric sector GHG emissions reduction goals by reducing overall grid emissions. Savings is reported as zero since this initiative generates increased revenue for the corporation (not a savings). Payback for GHG reductions is not applicable for this project. This was counted as 2 project implemented in 4.3a.

**C4.3c**

(C4.3c) What methods do you use to drive investment in emissions reduction activities?

<table>
<thead>
<tr>
<th>Method</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other</td>
<td>Each year Exelon sets three GHG related performance targets which are reported on quarterly to upper management. These include an annual net GHG target for operational emissions - which is a milestone on the path to achieving our 5-year reduction goal; a customer abatement target which incorporates customer energy efficiency programs and RPS REC commitments; and a Clean Energy Development target focused on completion of new clean generation technologies including nuclear uprates, utility scale renewable projects, and distributed generation development. These target help to keep the importance of GHG mitigation and the transition to a clean energy economy in discussion through Exelon and a part of how we do business.</td>
</tr>
<tr>
<td>Compliance with regulatory requirements/standards</td>
<td>In response to state requirements for electric utility companies to develop cost-effective plans to reduce electricity consumption, the Exelon companies have implemented a portfolio of leading-edge energy efficiency and demand response programs. These programs have helped our customers reduce their energy consumption by more than 56 million MWh over the last three years alone. Our energy efficiency programs place Exelon third among the nation’s utilities in terms of customer energy savings. Over the next three to four years, consistent and significant investment in these programs will continue.</td>
</tr>
<tr>
<td>Dedicated budget for low-carbon product R&amp;D</td>
<td>Exelon is also working to develop and expand the use of hourly pricing programs. For example, ComEd’s hourly pricing program allows enrolled residential customers to pay real-time market electricity prices, which vary from hour to hour. Through this program, customers who take advantage of lower prices (e.g., shifting the use of large electric appliances to lower-priced off-peak hours) can potentially save money on their electricity bills while helping the utility reduce peak load demand. Peak load generation pulls on the least efficient, often highest emitting generating plants. Better managing peak load can ultimately reduce GHG emissions relating to these fossil peaking generating plants.</td>
</tr>
<tr>
<td><strong>Partnering with governments on technology development</strong></td>
<td>All three of our utilities are implementing smart meter programs to help customers conserve energy, save money and make smarter energy choices. Direct benefits of the meters include increased access to energy usage and cost information, additional energy management product and service programs and more efficient outage management. Likewise, the utilities are expected to see a reduction in bad debt expense, inactive meter electricity consumption and theft and tampering effects, which are savings that can be passed on to consumers. Such projects can only be accomplished with careful coordination with state utility commissions – and all of which would not have been possible without our early involvement in the Advanced Metering Infrastructure (AMI) Pilot Program which was used to collect data and allow for ComEd and the Illinois Commerce Commission (ICC) to evaluate how AMI will affect operating costs and how it can enable customers to make information-based decisions about energy usage, improve their energy efficiency, reduce energy bills, and cut greenhouse gas emissions. These upgrades can help to optimize T&amp;D system operation and manage peak load, which will result in more efficient electricity generation, distribution and use. Smart grid upgrades will also improve reliability. Similarly, PECO and BGE were two of only six utilities to receive major stimulus funding from the U.S. Department of Energy’s Smart Grid Investment Grant in late 2009.</td>
</tr>
<tr>
<td><strong>Compliance with regulatory requirements/standards</strong></td>
<td>U.S. EPA regulations have the potential to drive retirement of older fossil generating plants by increasing their operating costs such that it is no longer cost effective to continue to operate.</td>
</tr>
<tr>
<td><strong>Dedicated budget for low-carbon product R&amp;D</strong></td>
<td>Exelon maintains a Technology Exchange Council and an Emerging Technology Team whose missions are to explore new and emerging technologies relating to electricity generation, storage, transmission and distribution. Exelon also maintains Constellation Technology Ventures (CTV), an organization that invests in venture-stage firms developing innovative, energy-related technologies. In addition, Exelon contributes to research opportunities related to the advancing the electrical industry, and/or environmental and climate change concerns. This research funding was primarily invested in Electric Power Research Institute (EPRI) efforts, with a few key universities and organizations also being supported. Research focused heavily on Nuclear advancement, with other focus areas including Transmission and Distribution, Fossil Fuel advancement, Beyond-the-meter technologies and environmental issues.</td>
</tr>
<tr>
<td><strong>Employee engagement</strong></td>
<td>Exelon uses many employee engagement activities, such as contests, events and volunteer opportunities to make employees aware of the importance of GHG management and climate change adaptation to the corporation and elicit ideas and input on how best to integrate this initiative into their day-to-day roles and responsibilities. Specifically our Eco-Team employee resource groups are funded initiatives that support electricity use reduction, greening of office and home activities in support of GHG reductions and sustainability education.</td>
</tr>
<tr>
<td>Financial optimization calculations</td>
<td>Exelon typically evaluates all capital investment decisions on the basis of traditional financial metrics - such as net present value (NPV), internal rate of return (IRR), and payback periods - in a variety of pricing and operational environments (or cases). Certain cases may assume more or less stringent environmental standards or a regulatory price on carbon, and the outcomes in these scenarios are incorporated into the investment decision through analytical tools such as Monte Carlo simulation.</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Internal finance mechanisms</td>
<td>Exelon assigns a technology-specific cost of capital to different assets. This technology-specific cost of capital incorporates the potential cost associated with varying emission and GHG policies (such as a carbon tax, cap and trade program or other form of price on carbon) by embedding a specific risk premium into the required equity return and the appropriate capital structure.</td>
</tr>
<tr>
<td>Partnering with governments on technology development</td>
<td>As the operator of several large vehicle fleets, Exelon and its subsidiaries have converted all on-site fuel stations for diesel vehicles to dispense biodiesel, and placed more than 3828 alternative vehicles in service. ComEd is quickly becoming a leader in workplace charging in the Chicago region, and has signed on to the U.S. DOE’s Workplace Charging Challenge. ComEd is active in the Illinois Electric Vehicle Advisory Council and Chicago Area Clean Cities Coalition to proactively address policy issues and raise public awareness on the benefits of alternative fuel vehicles – particularly electric vehicles. ComEd and PECO are also participating in a project with the Electric Power Research Institute (EPRI) and U.S. DOE, through which they are demonstrating PHEVs in a variety of vehicle platforms within their respective fleets. These include vans, pickup trucks, bucket trucks, digger derricks and underground construction vehicles. All Exelon utilities are also participating in the Edison Electric Industry (EEI) vehicle electrification challenge.</td>
</tr>
<tr>
<td>Other Community Engagement</td>
<td>Exelon maintains a high involvement with the communities in which we work, and emphasized education on energy efficiency and the science of electricity. PECO offers &quot;Energizing Education&quot; for middle schools, a program that assists participants with school and home energy audits. Exelon Generation maintains the Fairless Hills Renewable Energy Education Center and the Conowingo Hydroelectric Facility Visitor Center, both of which focus on promoting the power of renewable energy sources. Exelon Nuclear is a major sponsor of the Delaware Valley Science Fair in the Philadelphia area, providing funding as well as personnel support. Company volunteers are also involved in weatherization projects through Habitat for Humanity.</td>
</tr>
</tbody>
</table>
C4.5

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions?

Yes

C4.5a

(C4.5a) Provide details of your products and/or services that you classify as low-carbon products or that enable a third party to avoid GHG emissions.

Level of aggregation
Group of products

Description of product/Group of products
Renewable and Zero Emissions Electric Generation

Are these low-carbon product(s) or do they enable avoided emissions?
Avoided emissions

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions
Other, please specify
Fossil generation avoided

% revenue from low carbon product(s) in the reporting year
51

Comment
51% of revenue is an estimate based on the ratio of zero carbon electricity generation to total generation produced (89%) applied to the percent of revenue from generation as compared to total revenue for the corporation. Other related business efforts include coordination of REC and
EFEC sales for customers and increasing customer access to lower carbon generation purchases which occurs in our Constellation retail branch of our generation company. These additional revenue streams are not covered in the above estimated number.

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**Level of aggregation**
Group of products

**Description of product/Group of products**
Distributed solar generation development

**Are these low-carbon product(s) or do they enable avoided emissions?**
Low-carbon product

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**
Other, please specify
New Zero emissions electric generation

**% revenue from low carbon product(s) in the reporting year**
1

**Comment**
Constellation sells and installed distributed solar generation systems which is a low carbon product / service. Siting and construction of distributed generation for customers including creative financing options and coordination with meeting their electricity needs.

---

**Level of aggregation**
Group of products

**Description of product/Group of products**
Utility Customer Energy Efficiency Programs
Are these low-carbon product(s) or do they enable avoided emissions?

Avoided emissions

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions

Other, please specify

Grid Electric Generation avoided

% revenue from low carbon product(s) in the reporting year

0

Comment

Assisting customer in reducing their electric use and overall peak demand on the system through coordinated educational programs and energy efficiency products and services. This is shown as zero percent of revenue since their programs are paid for as part of electricity rates.

C-EU4.6

(C-EU4.6) Describe your organization's efforts to reduce methane emissions from your activities.

Cost of fuel and fuel efficiency are two key factors determining the financial viability of a natural gas electric generation station. Because of that, Exelon is focused on minimizing leakage of natural gas at these locations through regular inspections and preventative maintenance programs throughout the facilities. Exelon's largest natural gas generation units are its Combined-Cycle Generation Turbines (CCGTs), such as Wolf Hollow and Colorado Bend in Texas, Hillabee in Alabama and Mystic station in Boston, Massachusetts. For the CCGT units at these plants, all built in the 21st century, Exelon further maintains heat rate targets for their electric generation performance, targeting to ensure high levels of generation production per mscf of fuel burned. These goals ensure that plant personnel are continually working to optimize the unit performance and minimize fuel loss or waste. Each unit has its own 5-year performance target goal, with annual milestone targets to drive continual improvement in unit efficiency. Exelon also retired its last bituminous coal-fired plants in 2011/2012 and no longer owns any coal-fired generation as part of its business and environmental strategy; removing the issue of coal-fired generation GHG emissions and coal pile methane emissions from the company's GHG inventory also represents a significant accomplishment in minimizing methane emissions from electricity generation.

In addition to the efforts at our electric generation facilities, BGE, Delmarva and PECO repair and pro-actively replace and upgrade their system to ensure and improve operations associated with their natural gas distribution systems. Converting from cast iron piping to plastic can reduce methane emissions by 95%. All three utilities are long time members of the EPA’s Natural Gas Star program and in April 2016 committed to the Methane
Reduction Challenge - establishing a goal to replace cast iron and unprotected steel mains in the system at a minimum rate of 2% per year through 2021. Performance against this goal has continued to be strong, with 101.7 miles of cast iron main and 17.3 miles of unprotected steel replaced (nearly 5%) in 2018. This effort is counted as 3 projects implemented (relating one each to BGE, Delmarva and PECO), with a similar 3 projects to be implemented in 2019, under question 4.3a, as well as towards performance under 4.1a Abs1 and 4.2 KPI for methane emissions.

Exelon’s gas distribution affiliates use the following equipment to monitor emission leaks on transmission and distribution pipes: Optical Methane Detectors, Remote Methane Leak Detectors, Detecto Pak-Infrared and Sensit Gold G2. Exelon’s gas distribution companies monitor pipelines for leaks in accordance with 49 C.F.R. § 192.706 (for transmission lines) and 49 C.F.R § 192.723 (for distribution lines). Their leak-grade repair timeframes and prioritization methodologies exceed federal requirements. Exelon bases its leak grading system on guidance material from the Gas Pipeline Technology Committee (GPTC): Exelon uses four different grades of natural gas leaks (Grades 1, 2A, 2B and 3); Exelon repairs hazardous leaks (Grade 1) promptly in accordance with 49 C.F.R. § 192.703; Exelon’s response time for Grade 2A and 2B leaks exceeds the regulatory requirements specified in Section 192.703.

C-OG4.6

(C-OG4.6) Describe your organization’s efforts to reduce methane emissions from your activities.

Exelon does not have any oil and gas production activities. All investments in upstream gas production were divested in 2016. Exelon only has natural gas distribution systems at this time.

Three of Exelon’s utilities — PECO, BGE and DPL — provide natural gas distribution service to customers through approximately 16,000 miles of gas mains, as well as a limited amount of gas transmission pipe (less than 200 miles). Over the course of our industry’s long history, a variety of pipe main materials have been used, including cast iron, bare steel, coated steel and plastic. Service connections from the gas main in the street to the home or business have also used various materials, including copper, bare steel, coated steel and plastic, with Exelon’s utilities having more than one million gas service connections. More information on our Mains and Services can be found at the following web link: https://www.exeloncorp.com/sustainability/Documents/Man_and_service_by_company.pdf

Exelon’s utilities have active programs in place to replace old cast iron and bare steel gas mains that may be more prone to methane leakage due to their age and physical properties. Similarly, older gas services are being upgraded as needed on a proactive basis. As can be seen in the below bar charts, DPL has already replaced most of its cast iron and unprotected steel mains. BGE and PECO both maintain long-term pipe replacement programs aimed at eliminating all cast iron and unprotected steel pipes and services by 2037.
Replacement program details can be found at the following web link: https://www.exeloncorp.com/sustainability/Documents/Replacement_program.pdf

From a safety perspective, Exelon conducts periodic surveys of gas main and service assets, regardless of pipe type or age, to identify potential fugitive emission leaks, using a variety of technologies. These include optical methane detectors, remote methane leak detectors and combustible gas indicators. Identified leaks are prioritized for repair based on risk and in conformance with, or faster than, industry standards and regulatory requirements. Leak detection and repair details can be found at the following web link: https://www.exeloncorp.com/sustainability/Documents/Leak_detection_and_repair.pdf

Exelon’s gas utilities are members of the U.S. Environmental Protection Agency (EPA) Methane Challenge program, under which our utilities have committed to replace at least two percent of cast iron and unprotected steel natural gas distribution piping per year through 2021 (both counting towards performance under 4.1a Abs1 and 4.2 KPI for methane emissions). Under Exelon’s new GHG emission reduction goal to reduce operations-related GHG emissions by 15 percent by 2022, methane emission reductions are a key component of our emission reduction strategy. Our 2015 baseline year methane emissions were over 420,000 metric tons of CO2e. In terms of emission intensity, we estimate that methane emissions in our 2015 baseline year were 0.44 percent of weather-corrected total natural gas system throughput. GHG emissions and intensity information can be found at the following web link: https://www.exeloncorp.com/sustainability/Documents/GHG_emission_and_intensity.pdf

COG4.7

(C-OG4.7) Does your organization conduct leak detection and repair (LDAR) or use other methods to find and fix fugitive methane emissions from oil and gas production activities?

No, this is not relevant to our operations

C-OG4.7b

(C-OG4.7b) Explain why you do not conduct LDAR or use other methods to find and fix fugitive methane emissions, and whether you have a plan to do so from your oil and gas production activities.

Exelon does not have any oil and gas production activities. All investments in upstream gas production were divested in 2016. Exelon only has natural gas distribution systems at this time. We do conduct leak detection and repair (LDAR) to find and fix fugitive methane emissions from our natural gas distribution system.
C-OG4.8

(C-OG4.8) If flaring is relevant to your oil and gas production activities, describe your organization’s efforts to reduce flaring, including any flaring reduction targets.

Exelon does not have any oil and gas production activities. All investments in upstream gas production were divested in 2016. Exelon only has natural gas distribution systems at this time.

C5. Emissions methodology

C5.1

(C5.1) Provide your base year and base year emissions (Scopes 1 and 2).

 Scope 1

 Base year start
 January 1, 2015

 Base year end
 December 31, 2015

 Base year emissions (metric tons CO2e)
 7,325,918

 Comment
 As re-verified in 2017 for to reflect the PHI merger, as well as the divestiture of Conemaugh and Keystone coal generation stations, former upstream gas investments, and Sunnyside waste coal generation station all of which had previously been part of our equity share portfolio. Pending formal adjustment for Fitzpatrick and Everett LNG acquisitions, and Colorado Bend, Mountain Creek, Wolf Hollow and LaSalle divestitures in 2017 and 2018 not exceeding 5% of total inventory in aggregate.
Scope 2 (location-based)

<table>
<thead>
<tr>
<th><strong>Base year start</strong></th>
<th>January 1, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Base year end</strong></td>
<td>December 31, 2015</td>
</tr>
<tr>
<td><strong>Base year emissions (metric tons CO2e)</strong></td>
<td>7,340,381</td>
</tr>
</tbody>
</table>

**Comment**
As re-verified in 2017 for to reflect the PHI merger, as well as the divestiture of Conemaugh and Keystone coal generation stations, former upstream gas investments, and Sunnyside waste coal generation station all of which had previously been part of our equity share portfolio. Pending formal adjustment for Fitzpatrick and Everett LNG acquisitions, and Colorado Bend, Mountain Creek, Wolf Hollow and LaSalle divestitures in 2017 and 2018 not exceeding 5% of total inventory in aggregate.

Scope 2 (market-based)

<table>
<thead>
<tr>
<th><strong>Base year start</strong></th>
<th>January 1, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Base year end</strong></td>
<td>December 31, 2015</td>
</tr>
<tr>
<td><strong>Base year emissions (metric tons CO2e)</strong></td>
<td>5,654,620</td>
</tr>
</tbody>
</table>

**Comment**
As re-verified in 2017 for to reflect the PHI merger, as well as the divestiture of Conemaugh and Keystone coal generation stations, former upstream gas investments, and Sunnyside waste coal generation station all of which had previously been part of our equity share portfolio.
Pending formal adjustment for Fitzpatrick and Everett LNG acquisitions, and Colorado Bend, Mountain Creek, Wolf Hollow and LaSalle divestitures in 2017 and 2018 not exceeding 5% of total inventory in aggregate, portfolio.

C5.2

(C5.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions.

- ISO 14064-1
- The Climate Registry: Electric Power Sector (EPS) Protocol
- The Climate Registry: General Reporting Protocol
- US EPA Mandatory Greenhouse Gas Reporting Rule

C6. Emissions data

C6.1

(C6.1) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

<table>
<thead>
<tr>
<th>Reporting year</th>
<th>Gross global Scope 1 emissions (metric tons CO2e)</th>
<th>Start date</th>
<th>End date</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>9,526,298</td>
<td>January 1, 2018</td>
<td>December 31, 2018</td>
<td></td>
</tr>
</tbody>
</table>
Equity Share Boundary

**C6.2**

(C6.2) Describe your organization’s approach to reporting Scope 2 emissions.

---

**Row 1**

- **Scope 2, location-based**
  - We are reporting a Scope 2, location-based figure

- **Scope 2, market-based**
  - We are reporting a Scope 2, market-based figure

**Comment**

No Comment

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**C6.3**

(C6.3) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

---

**Reporting year**

- **Scope 2, location-based**
  - 6,120,046

- **Scope 2, market-based (if applicable)**
  - 4,817,413

**Start date**

January 1, 2018

**End date**
December 31, 2018

Comment
Equity Share Boundary; Scope 2 location-based uses the specific ISO average emission factor if available for the region, otherwise employing the EPA eGRID sub-regional factors from 2016 data set as issued in 2/2018; Scope 2 market-based use ISO residual factors where available, otherwise employing the EPA eGRID sub-regional factors from 2016 data set as issued in 2/2018 where ISO regional rates are not available. Scope 2 market-based also reflects Exelon purchases of Green-e RECs and PJM Emissions Free Energy Credits attributed to nuclear generation in this ISO where such attributes are tracked and able to be retired to a specific user.

C6.4

(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?
Yes

C6.4a

(C6.4a) Provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure.

Source
Minuscule sources as defined by The Climate Registry for the electric sector.

Relevance of Scope 1 emissions from this source
Emissions are not relevant

Relevance of location-based Scope 2 emissions from this source
No emissions excluded

Relevance of market-based Scope 2 emissions from this source (if applicable)
No emissions excluded

**Explain why this source is excluded**

Emissions may include refrigerants for units of less than 50 pounds, acetylene from welding, site barbecues, lawn mowing equipment, etc that are not significant to our operations.

**C6.5**

(C6.5) Account for your organization’s Scope 3 emissions, disclosing and explaining any exclusions.

**Purchased goods and services**

**Evaluation status**

Not relevant, explanation provided

**Explanation**

At this time, Exelon is focused on reducing emissions within its own operations, as well as maintaining its clean energy fleet to ensure the lowest emission electricity is supplied to the grid for our customers. While we see the goods and services we purchase as an important consideration, we are approaching the management of these emissions through our participation in the Electric Utility Industry Sustainable Supply Chain Alliance. As part of this organization, we engage our suppliers to encourage the tracking, reporting and reduction of GHG emissions associated with the products we buy. The Alliance has also developed supply standards for key high use items material to our business which outlines best management practices for suppliers in these industries to reduce GHG emissions and other environmental impacts. Exelon has not yet calculated GHG emissions specifically related to products that we purchase.

**Capital goods**

**Evaluation status**

Not relevant, explanation provided

**Explanation**

Nuclear fuel is considered a capital good for our business. At this time, there are no potential emissions reductions initiatives that could be undertaken by the company relating to these Scope 3 emissions associated with this category.
### Fuel-and-energy-related activities (not included in Scope 1 or 2)

<table>
<thead>
<tr>
<th>Evaluation status</th>
<th>Relevant, calculated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metric tonnes CO2e</td>
<td>21,022,170</td>
</tr>
</tbody>
</table>

**Emissions calculation methodology**

The emissions that have been calculated include long term power purchase agreements for generation in addition to our owned assets which we sell and trade. Attributes associated with renewable energy may be sold as RECs. eGRID plant specific emissions rates were employed for generation suppliers with long-term PPAs. National average grid mix was used for supply where source generation was not specified. These scope three emissions do not include life cycle emissions of the fuels we use for generation.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

60%

**Explanation**

Scope 3 emissions associated with fossil fuels purchased for use in electric generation are not calculated. These are not seen to be potential emissions reductions that could be undertaken by the company at this time.

### Upstream transportation and distribution

<table>
<thead>
<tr>
<th>Evaluation status</th>
<th>Not relevant, explanation provided</th>
</tr>
</thead>
</table>

**Explanation**

At this time, these are not potential emissions reductions that could be undertaken by the company. Upstream transportation and distribution for Exelon's business would relate to transmission lines for electricity and pipelines for natural gas not owned by Exelon and for which Exelon could not reasonably make an impact on with regard to GHG emissions reductions.

### Waste generated in operations
Evaluation status
Relevant, calculated

Metric tonnes CO2e
10,002

Emissions calculation methodology
Exelon uses the EPA Wastewise WARM model for the calculation of Scope 3 emissions from municipal wastes and scrap metal materials generated from our operations. Presented are the emissions from the waste that is landfilled. Exelon also avoided 487,269 mtCO2e from the recycling of office paper, congregated boxes, mixed plastics and various scrap metals.

Percentage of emissions calculated using data obtained from suppliers or value chain partners
75

Explanation
Exelon does estimate some of the waste generation amounts in association with dumpsters that are only weighed periodically

Business travel

Evaluation status
Relevant, calculated

Metric tonnes CO2e
29,062

Emissions calculation methodology
Exelon uses the EPA Climate Leaders guidance on Optional Emissions from Commuting, Business Travel and Product Transport issued May 2008 for calculation of business travel emissions beyond those captured from our fleet vehicles and aircraft in our Scope 1 emissions.

Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Explanation
Exelon receives summaries of our miles traveled by each mode of transportation from our business travel agency.

**Employee commuting**

**Evaluation status**
Not relevant, explanation provided

**Explanation**
At this time, there are not significant emissions reductions that could be undertaken or influenced by the company for employee commute given that the means of calculating these types of emissions would have to be based on assumptions that would not cleanly pick up efforts made to reduce emissions. However, Exelon has initiated the EZ-EV program and free onsite vehicle charging for employees to encourage a transition to clean forms of commute where possible. We have also develop a program called CarCompanions which helps employees traveling to the same offsite locations share rides and reduce associated GHG emissions from parallel means of transport.

**Upstream leased assets**

**Evaluation status**
Relevant, calculated

**Metric tonnes CO2e**
18,186

**Emissions calculation methodology**
Exelon uses The Climate Registry General Reporting Protocol for the calculation of these emissions. These emissions are included in our annual GHG verification activities and are included as part of our operational control emissions as reported in our verification statement as attached below. There are some buildings for which actual data cannot be obtained and electricity use is estimated based on the square footage leased.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**
90

**Explanation**
Exelon does capture these buildings in its internal performance goals for GHG management, and works to drive emissions reductions where it is able to influence energy purchasing or building efficiency, and considers these emissions as part of its Scope 2 emissions for verification as we verify under an equity share boundary for our inventory. (leased building emissions are considered Scope 3 under an operational boundary).

**Downstream transportation and distribution**

**Evaluation status**
Not relevant, calculated

**Metric tonnes CO2e**
0

**Emissions calculation methodology**
The primary emissions associated with transportation and distribution of our products (electricity and natural gas) are already captured as part of our Scope 1 and 2 inventory.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**
100

**Explanation**
Exelon's emissions associated with transportation and distribution of our products is captured under our Scope 2 emissions associated with T&amp;D Line Losses which are accounted for in accordance with The Climate Registry's Electric Sector Protocol and are verified as part of our annual GHG verification activities. Therefore there are no sources for us to capture under this category of Scope 3 and 0 emissions.

**Processing of sold products**

**Evaluation status**
Not relevant, calculated

**Metric tonnes CO2e**
0

**Emissions calculation methodology**
Exelon does not have processing of sold products that is not captured under its Scope 1 and Scope 2 inventory.

<table>
<thead>
<tr>
<th>Percentage of emissions calculated using data obtained from suppliers or value chain partners</th>
</tr>
</thead>
<tbody>
<tr>
<td>100</td>
</tr>
</tbody>
</table>

**Explanation**
Exelon does not have processing of sold products that is not captured under its Scope 1 and Scope 2 inventory.

**Use of sold products**

**Evaluation status**
Relevant, calculated

<table>
<thead>
<tr>
<th>Metric tonnes CO2e</th>
</tr>
</thead>
<tbody>
<tr>
<td>88,247,749</td>
</tr>
</tbody>
</table>

**Emissions calculation methodology**
These emissions represent emissions associated with electricity not purchased or generated by Exelon, but that is distributed by our utilities ACE, BGE, Delmarva, PECO, Pepco and ComEd to their customers (and accounted for as our customers Scope 2 emissions); as well as emission related to the use of natural gas delivered by Delmarva, PECO and BGE to customers (and accounted for as our customers Scope 1 emissions). Grid emissions rates are used for estimating emissions associated with electricity delivery as supplier rates are not typically available.

<table>
<thead>
<tr>
<th>Percentage of emissions calculated using data obtained from suppliers or value chain partners</th>
</tr>
</thead>
<tbody>
<tr>
<td>100</td>
</tr>
</tbody>
</table>

**Explanation**
Emissions are accounted for in accordance with The Climate Registry's Electric Sector Protocol as a fundamental part of T&D line loss emissions calculations, which are verified as part of our primary emissions verification. Data is as acquired from customer delivery meters.

**End of life treatment of sold products**

**Evaluation status**
Relevant, calculated

Metric tonnes CO2e
0

Emissions calculation methodology
There is no end of life treatment required for of our primary products: wholesale and retail electricity and retail natural gas.

Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Explanation
There is no end of life treatment required for of our primary products: wholesale and retail electricity and retail natural gas.

Downstream leased assets
Evaluation status
Not relevant, explanation provided

Explanation
Exelon's Eddystone facility started to lease a portion of its property for transfer of fuel from rail to barge in 2014. This operation is small in comparison to our other operations.

Franchises
Evaluation status
Relevant, calculated

Metric tonnes CO2e
0

Emissions calculation methodology
Exelon did not have any applicable franchises in 2018.
Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Explanation
Exelon did not have any applicable franchises in 2018.

Investments

Evaluation status
Not relevant, explanation provided

Explanation
At this time, Exelon's primarily business is as an energy holding company with operations associated with electric and gas distribution and electric generation. This Scope 3 category is applicable to investors (i.e., companies that make an investment with the objective of making a profit) and companies that provide financial services, and is thus not relevant to Exelon at this time.

Other (upstream)

Evaluation status
Relevant, calculated

Metric tonnes CO2e
0

Emissions calculation methodology
Exelon did not have any other applicable upstream sources in 2017.

Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Explanation
Exelon did not have any other applicable upstream sources in 2018.
Other (downstream)

Evaluation status
Relevant, calculated

Metric tonnes CO2e
457,753

Emissions calculation methodology
These emissions are accounted for in accordance with The Climate Registry’s General Reporting Protocol. These emissions include emissions associated with electric generation, heating and cooling equipment we do not own but that we operate for others; or lease to others for their operations (such as fuel cells) primarily under our Energy Solutions business.

Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Explanation
These emissions are included in our annual GHG verification activities and are included as part of our operational control emissions reported through the Climate Registry and as reported in our verification statement as attached below.

C6.7

(C6.7) Are carbon dioxide emissions from biologically sequestered carbon relevant to your organization?
Yes

C6.7a

(C6.7a) Provide the emissions from biologically sequestered carbon relevant to your organization in metric tons CO2.

Row 1

Emissions from biologically sequestered carbon (metric tons CO2)
435,626

Comment
Includes emissions from biogas and biomass generation facilities, as well as biogas fuels used in our fleet vehicles. Exelon has 174 mtCO2e of biogenic emissions associated with indirect district heating associated with a trash to steam facility.

C6.10

(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

<table>
<thead>
<tr>
<th>Intensity figure</th>
<th>0.0004</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metric numerator (Gross global combined Scope 1 and 2 emissions)</td>
<td>14,343,711</td>
</tr>
<tr>
<td>Metric denominator</td>
<td>unit total revenue</td>
</tr>
<tr>
<td>Metric denominator: Unit total</td>
<td>35,985,000,000</td>
</tr>
<tr>
<td>Scope 2 figure used</td>
<td>Market-based</td>
</tr>
<tr>
<td>% change from previous year</td>
<td>8.5</td>
</tr>
<tr>
<td>Direction of change</td>
<td>Decreased</td>
</tr>
</tbody>
</table>
Reason for change

Exelon’s GHG revenue intensity rate decreased because revenues increased more than emissions given our overall focus on being a low carbon solutions provider for our customers and communities. We saw decreases in our Scope 1 emissions as a result of various emission reduction activities, such as our natural gas pipe replacement program and fleet vehicle electrification efforts, as well as from divestiture of less efficient generation plants in Texas, which have been replaced in our portfolio by our two new high efficiency combined-cycle generation turbines (CCGTs) which saw their first full year of operation this year. These new plants are significantly cleaner than the grid average emissions rate in the region, are more economic because of that increased fuel efficiency and have the potential to reduce overall emissions from the Texas electric grid. In addition, these new generation assets also increase our generation production volumes and revenues at a rate greater than the emissions that they added, building shareholder benefit in this regard as well. Our overall emissions total, also benefited from reductions in other areas of our emissions inventory, for example Scope 2 emissions associated with our transmission and distribution line losses decreased due in part to emissions reduction infrastructure investments on our utility distribution systems (such as voltage conservation reduction projects and other ongoing infrastructure investments to make systems more efficient and resilient). These combined elements contributed to our overall improved performance for this this emissions per revenue metric.

It should be noted that our new CCGT plants in Texas displaced over 850,000 metric tons from higher emitting generation sources in the Texas region in 2018 (as calculated based on the difference between the amount of power they generated at the grid average emission rate verses the amount of emissions they made generating that same power). While these new plants increase Exelon Scope 1 emissions – they are considered an emissions reduction effort as it relates to our Scope 3 customer emissions because they result in an overall decrease in electric grid emissions associated with power delivered to customers.

C-OG6.12

(C-OG6.12) Provide the intensity figures for Scope 1 emissions (metric tons CO2e) per unit of hydrocarbon category.

Unit of hydrocarbon category (denominator)
Million cubic feet of natural gas

Metric tons CO2e from hydrocarbon category per unit specified
1.78
% change from previous year
9

Direction of change
Decreased

Reason for change
This relates to the portion of our Scope 1 emissions that are associated with gas distribution systems of our utilities BGE, PECO and Delmarve Power combined (368,390 mtCO2e numerator), as compared to their throughput of natural gas for delivery. Exelon utilities BGE, PECO and Delmarva Power have been implementing a proactive pipe replacement plan to eliminate cast iron and unprotected distribution mains and services which are aging and have higher leak rates than the plastic replacements. This emissions reduction effort has resulted in a reduction in our methane emissions to natural gas delivered (mscf) intensity rate.

Comment
It should be noted that in last year's CDP report, we reported the ratio of methane release in mscf as compared to the natural gas delivered (mscf) in alignment with the EPA Methane Challenge reporting. This year's reporting is in mtCO2e/mscf delivered to more directly align with the CDP questionnaire.

C-OG6.13

(C-OG6.13) Report your methane emissions as percentages of natural gas and hydrocarbon production or throughput.

Oil and gas business division
Downstream

Estimated total methane emitted expressed as % of natural gas production or throughput at given division
0.37

Estimated total methane emitted expressed as % of total hydrocarbon production or throughput at given division
0.37
Comment
This relates to fugitive methane emissions (in units of mscf) associated with the natural gas distribution systems of our utilities BGE, PECO and Delmarva Power combined, as compared to their throughput of natural gas for delivery (also in mscf). Exelon utilities BGE, PECO and Delmarva Power have been implementing a proactive pipe replacement plan to eliminate cast iron and unprotected distribution mains and services which are aging and have higher leak rates than the plastic replacements. This emissions reduction effort has resulted in a reduction in our methane emissions (mscf natural gas leaked) to natural gas delivered (mscf) intensity rate. Exelon no longer owns upstream gas production assets as of December 2016.

C7. Emissions breakdowns

C7.1

(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?
Yes

C7.1a

(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).

<table>
<thead>
<tr>
<th>Greenhouse gas</th>
<th>Scope 1 emissions (metric tons of CO2e)</th>
<th>GWP Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO2</td>
<td>9,051,016.1</td>
<td>IPCC Fourth Assessment Report (AR4 - 100 year)</td>
</tr>
<tr>
<td>CH4</td>
<td>378,069.3</td>
<td>IPCC Fourth Assessment Report (AR4 - 100 year)</td>
</tr>
<tr>
<td>N2O</td>
<td>9,291</td>
<td>IPCC Fourth Assessment Report (AR4 - 100 year)</td>
</tr>
<tr>
<td>HFCs</td>
<td>616.1</td>
<td>IPCC Fourth Assessment Report (AR4 - 100 year)</td>
</tr>
<tr>
<td>SF6</td>
<td>87,303</td>
<td>IPCC Fourth Assessment Report (AR4 - 100 year)</td>
</tr>
</tbody>
</table>
**C-EU7.1b**

(C-EU7.1b) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.

<table>
<thead>
<tr>
<th></th>
<th>Gross Scope 1 CO2 emissions (metric tons CO2)</th>
<th>Gross Scope 1 methane emissions (metric tons CH4)</th>
<th>Gross Scope 1 SF6 emissions (metric tons SF6)</th>
<th>Gross Scope 1 emissions (metric tons CO2e)</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Fugitives</strong></td>
<td>7,612.34</td>
<td>14,912.19</td>
<td>3.82</td>
<td>468,336</td>
<td>This line item combines our electric generation business with the emissions associated with the electric distribution systems of our utilities and their natural gas distribution system (which is also reported under O&amp;G 7.1b). For fugitive methane emissions only 1,103 tonnes CO2e is attributable to the electric generation and electric distribution and the balance is fugitive losses from the natural gas distribution system. It should also be noted that our utilities are not vertically integrated such that our electric generation business sells its power to the open market and our electric utilities then buy electricity discretely off the open market (our electricity does not flow directly to our electric utilities). The balance of the fugitives reported in the fourth column is HFCs.</td>
</tr>
<tr>
<td><strong>Combustion</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(Electric utilities)</td>
<td>8,848,023</td>
<td>205</td>
<td>0</td>
<td>8,862,002</td>
<td>This breakdown includes only combustion emissions associated with grid supplied electric generation. It should be noted that our utilities are not vertically integrated with our electric generation business. The fourth column is N2O combustion emissions from electric generation.</td>
</tr>
<tr>
<td>(Gas utilities)</td>
<td>19,489.44</td>
<td>0.36</td>
<td>0</td>
<td>19,509.7</td>
<td>This breakdown includes only the combustion emissions associated with our utilities’ gas distribution system. The fourth</td>
</tr>
</tbody>
</table>
Combustion (Other)  |  75,846.81 |  3.22 |  0 |  76,028.18 |

This breakdown represents combustion emissions beyond electric generation or operation of our utilities' natural gas distribution systems.

Emissions not elsewhere classified  |  100,044.29 |  1.86 |  0 |  100,420.35 |

This breakdown represents mobile emissions across the corporation.

**C-OG7.1b**

(C-OG7.1b) Break down your total gross global Scope 1 emissions from oil and gas value chain production activities by greenhouse gas type.

<table>
<thead>
<tr>
<th>Emissions category</th>
<th>Gross Scope 1 CO2 emissions (metric tons CO2)</th>
<th>Gross Scope 1 methane emissions (metric tons CH4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fugitives</td>
<td>445.33</td>
<td>14,717.77</td>
</tr>
<tr>
<td>Value chain</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Downstream</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Product</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gas</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Total gross Scope 1 emissions (metric tons CO2e)  
368,389.71

Comment  
Includes the fugitive emissions associated with our utilities’ natural gas distribution systems per EPA CFR 40 Part 98 Subpart W. Utilities include BGE, Delmarva Power and PECO. This was also reported under EU7.1b fugitive emissions per the instructions.

Emissions category  
Combustion (excluding flaring)

Value chain  
Downstream

Product  
Gas

Gross Scope 1 CO2 emissions (metric tons CO2)  
5,440.74

Gross Scope 1 methane emissions (metric tons CH4)  
0.1

Total gross Scope 1 emissions (metric tons CO2e)  
5,446.37

Comment  
These emissions are also reported in EU 7.1b under gas utility combustion.

(C7.2) Break down your total gross global Scope 1 emissions by country/region.
## C7.3

(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

By business division

### C7.3a

(C7.3a) Break down your total gross global Scope 1 emissions by business division.

<table>
<thead>
<tr>
<th>Business division</th>
<th>Scope 1 emissions (metric ton CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exelon Generation - our electric generation company operating a mixture of nuclear, natural gas, and renewable generation assets producing grid supplied electric.</td>
<td>8,946,250.4</td>
</tr>
<tr>
<td>BGE - Baltimore Gas &amp; Electric is a de-regulated electric and gas utility operating in Baltimore, Maryland and the surrounding area. This utility is not vertically integrated with our Exelon Generation business, purchasing electricity needed for its customers competitively off the open market or delivering electricity for other electricity retailers.</td>
<td>233,762.1</td>
</tr>
<tr>
<td>ComEd - ComEd is a de-regulated electric utility operating in the ComEd and southern IL region. This utility is not vertically integrated with our Exelon Generation business, purchasing electricity needed for its customers competitively off the open market or delivering electricity for other electricity retailers.</td>
<td>40,031.6</td>
</tr>
<tr>
<td>PECO - PECO is a de-regulated electric and gas utility operating in Philadelphia, Pennsylvania and the surrounding area. This utility is not vertically integrated with our Exelon Generation business, purchasing electricity needed for its customers competitively off the open market or delivering electricity for other electricity retailers.</td>
<td>224,480</td>
</tr>
<tr>
<td>PHI - Pepco Holdings is a grouping of utilities that includes Pepco in Washington DC, Delmarva Power and Gas in Wilmington, DE and Atlantic City Electric in Atlantic City, NJ. These utilities are not vertically integrated with our Exelon Generation business,</td>
<td>75,625</td>
</tr>
</tbody>
</table>
purchasing electricity needed for its customers competitively off the open market or delivering electricity for other electricity retailers. All are electric distribution companies, and Delmarva also has a natural gas distribution system.

BSC / Constellation - Exelon Business Services is our corporate operations that support the other companies. Constellation is our competitive retail business. Both of these companies have GHG emissions primarily commercial building space.

**C-CE7.4/C-CH7.4/C-CO7.4/C-EU7.4/C-MM7.4/C-OG7.4/C-ST7.4/C-TO7.4/C-TS7.4**

(C-CE7.4/C-CH7.4/C-CO7.4/C-EU7.4/C-MM7.4/C-OG7.4/C-ST7.4/C-TO7.4/C-TS7.4) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

<table>
<thead>
<tr>
<th>Sector Production Activity</th>
<th>Gross Scope 1 emissions, metric tons CO2e</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electric utility generation activities</td>
<td>8,862,002</td>
<td>Electric generation stations</td>
</tr>
<tr>
<td>Oil and gas production activities (upstream)</td>
<td>0</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Oil and gas production activities (downstream)</td>
<td>368,390</td>
<td>Includes fugitive and combustion emissions associated with our utilities' natural gas distribution systems (BGE, PECO and Delmarva).</td>
</tr>
</tbody>
</table>

**C7.5**

(C7.5) Break down your total gross global Scope 2 emissions by country/region.

<table>
<thead>
<tr>
<th>Country/Region</th>
<th>Scope 2, location-based (metric tons CO2e)</th>
<th>Scope 2, market-based (metric tons CO2e)</th>
<th>Purchased and consumed electricity, heat, steam or cooling (MWh)</th>
<th>Purchased and consumed low-carbon electricity, heat, steam or cooling accounted in market-based approach (MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>166</td>
<td>166</td>
<td>192,696</td>
<td>0</td>
</tr>
<tr>
<td>United States of America</td>
<td>6,119,880</td>
<td>4,817,247</td>
<td>14,100,474</td>
<td>4,833,705</td>
</tr>
</tbody>
</table>
C7.6

(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.
By business division

C7.6a

(C7.6a) Break down your total gross global Scope 2 emissions by business division.

<table>
<thead>
<tr>
<th>Business division</th>
<th>Scope 2, location-based emissions (metric tons CO2e)</th>
<th>Scope 2, market-based emissions (metric tons CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exelon Generation - our electric generation company operating a mixture of nuclear, natural gas, and renewable generation assets producing grid supplied electric.</td>
<td>405,501</td>
<td>111,997</td>
</tr>
<tr>
<td>BGE - Baltimore Gas &amp; Electric is a de-regulated electric and gas utility operating in Baltimore, Maryland and the surrounding area. This utility is not vertically integrated with our Exelon Generation business, purchasing electricity needed for its customers competitively off the open market or delivering electricity for other electricity retailers.</td>
<td>932,907</td>
<td>770,449.6</td>
</tr>
<tr>
<td>ComEd - ComEd is a de-regulated electric utility operating in the ComEd and southern IL region. This utility is not vertically integrated with our Exelon Generation business, purchasing electricity needed for its customers competitively off the open market or delivering electricity for other electricity retailers.</td>
<td>3,002,746</td>
<td>2,417,549.6</td>
</tr>
<tr>
<td>PECO - PECO is a de-regulated electric and gas utility operating in Philadelphia, Pennsylvania and the surrounding area. This utility is not vertically integrated with our Exelon Generation business, purchasing electricity needed for its customers competitively off the open market or delivering electricity for other electricity retailers.</td>
<td>883,101</td>
<td>757,987</td>
</tr>
<tr>
<td>PHI - Pepco Holdings is a grouping of utilities that includes Pepco in Washington DC, Delmarva Power and Gas in Wilmington, DE and Atlantic City Electric in Atlantic City, NJ. These utilities are not vertically integrated with our Exelon Generation business, purchasing electricity needed for its customers</td>
<td>884,280</td>
<td>759,419</td>
</tr>
</tbody>
</table>
competitively off the open market or delivering electricity for other electricity retailers. All are electric
distribution companies, and Delmarva also has a natural gas distribution system.

| BSC / Constellation - Exelon Business Services is our corporate operations that support the other
| companies. Constellation is our competitive retail business. Both of these companies have GHG
| emissions primarily commercial building space. | 11,511 | 11 |

**C-CE7.7/C-CH7.7/C-CO7.7/C-MM7.7/C-OG7.7/C-ST7.7/C-TO7.7/C-TS7.7**

(C-CE7.7/C-CH7.7/C-CO7.7/C-MM7.7/C-OG7.7/C-ST7.7/C-TO7.7/C-TS7.7) Break down your organization’s total gross global Scope 2
emissions by sector production activity in metric tons CO2e.

<table>
<thead>
<tr>
<th>Sector</th>
<th>Scope 2, location-based, metric tons CO2e</th>
<th>Scope 2, market-based (if applicable), metric tons CO2e</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oil and gas production activities (upstream)</td>
<td>0</td>
<td>0</td>
<td>Exelon does not have these operations</td>
</tr>
<tr>
<td>Oil and gas production activities (downstream)</td>
<td>0</td>
<td>0</td>
<td>There are no discrete electric uses broken out for our utilities’ natural gas distribution systems.</td>
</tr>
</tbody>
</table>

**C7.9**

(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Decreased

**C7.9a**

(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined) and for each of them specify how your emissions compare to the previous year.
<table>
<thead>
<tr>
<th>Change in emissions (metric tons CO2e)</th>
<th>Direction of change</th>
<th>Emissions value (percentage)</th>
<th>Please explain calculation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Change in renewable energy consumption</td>
<td>Decreased</td>
<td>0.14</td>
<td>Due to ‘increased renewable energy consumption’ implemented during the year, despite an increase in our generation output, emissions have not grown as high as could be expected. Last year 1,028 metric tons of CO2e were reduced from our market-based inventory as a result in expanded purchases of Renewable energy credits to cover the power that we consume. In addition, 20,123 metric tons of emissions were avoided from traditional fossil generation as a result of 29.5 MW of new distributed solar generation built by Exelon in 2018. Our total Scope 1 and Scope 2 emissions in the previous year was 14,599,742 metric tons CO2e, therefore we arrived at -0.14% through (-21,151/14599742) * 100= -0.14% (i.e. a 0.14% decrease in emissions)</td>
</tr>
<tr>
<td>Other emissions reduction activities</td>
<td>Decreased</td>
<td>1.46</td>
<td>Due to ‘other emissions reduction activities’ implemented during the year, Exelon reduced its emissions 212,808 mtCO2e. Emissions reduction activities include building energy efficiency improvements; fleet vehicle electrification, biofuel blend increases and fuel efficiency improvements; natural gas distribution system modernization; fuel switching for auxiliary boilers; replacement of first generation breakers to reduce SF6 use; implementation of conservation voltage reduction in our utility systems; and increased use of zero carbon nuclear generation for our own electric consumption. Using 212,808 metric tons of CO2e reduced in 2018 by our emissions reduction projects, and our total Scope 1 and Scope 2 emissions in the previous year was 14,599,742 metric tons CO2e, therefore we arrived at -1.46% through (-212,808/14,599,742) * 100= -1.46% (i.e. a 1.46% decrease in emissions)</td>
</tr>
<tr>
<td>Divestment</td>
<td>Decreased</td>
<td>13.48</td>
<td>Due to ‘divestments’ that occurred during the year, despite an increase in generation output at our other sites, total emissions from generation were reduced. The divestment that occurred was the sale of Colorado Bend I, Wolf Hollow I, Mountain</td>
</tr>
</tbody>
</table>
Creek, and LaPorte, all located in Texas. These sales were completed in April 2018, making our total emissions in 2018 1,968,484 metric tons of CO2e less than 2017, because of the 8 additional months that these plants operated as part of our fleet during that year. Our total Scope 1 and Scope 2 emissions in the previous year was 14,599,742 metric tons CO2e, therefore we arrived at -13.48% through (-1,968,484/14,599,742) * 100= -13.48% (i.e. a 13.48% decrease in emissions)

<table>
<thead>
<tr>
<th>Acquisitions</th>
<th>15,232</th>
<th>Increased</th>
<th>0.1</th>
</tr>
</thead>
</table>
| Due to 'acquisitions' that occurred during the year, emissions reductions from other efforts were somewhat dampened. The acquisition that occurred was the Everett LNG import plant in Boston, MA. This acquisition occurred in November 2018, so impact to our 2018 inventory was limited two months of the plants 2018 operations or 15,232 metric tons of CO2e. Our total Scope 1 and Scope 2 emissions in the previous year was 14,599,742 metric tons CO2e, therefore we arrived at - 0.10% through (15,232/14,599,742) * 100= 0.10% (i.e. a 0.10% increase in emissions)

<table>
<thead>
<tr>
<th>Mergers</th>
<th>Not Applicable</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Change in output</th>
<th>1,125,414</th>
<th>Increased</th>
<th>7.71</th>
</tr>
</thead>
<tbody>
<tr>
<td>Due to 'changes in output' that occurred during 2018, despite other efforts to reduce emissions, emissions associated with our electric generation portfolio increased. These emissions increases are primarily related to our two new high efficiency natural gas plants which came online in TX in July 2017. It should be noted that while these new plants increased our corporate emissions, they are also helped to displace over 850,000 metric tons of emissions from the ERCOT grid annually by displacing higher emitting generation facilities that would have otherwise been dispatched to fulfill electricity demands. The impact of these new emissions to our inventory was offset somewhat by decreased emissions from other northeast fossil generation plants which dispatched less due to grid demand changes, as well as increases in our distributed solar supply. The total increase attributable to change in output in 2018 was 1,125,414 metric tons CO2e. Our total Scope 1 and Scope 2 emissions in the previous year was 14,599,742 metric tons CO2e, therefore we arrived at 7.71% through (1,125,414/14,599,742) * 100= 7.71% (i.e. a 7.71% increase in emissions)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Change in methodology | Not Applicable
--- | ---
Change in boundary | Not Applicable
Change in physical operating conditions | 805,110 | Increased | 5.51

Due to ‘changes in physical operating conditions’ that occurred during 2018 emissions were slightly higher than expected. The physical operating conditions relate to change in dispatch of our existing fossil plants and the delivery demands for electricity to our utility service territories as a result of weather and other external conditions. The total change in emissions attributable to these physical operating conditions is estimated at 805,110 metric tons CO2e. With our total Scope 1 and Scope 2 emissions in the previous year was 14,599,742 metric tons CO2e, we arrived at -5.51% through (805,110/14,599,742) * 100= 5.51% (i.e. a 5.51% increase in emissions)

Unidentified | Not Applicable
Other | Not Applicable

C7.9b

(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Market-based

C8. Energy

C8.1

(C8.1) What percentage of your total operational spend in the reporting year was on energy?

More than 50% but less than or equal to 55%
C8.2

(C8.2) Select which energy-related activities your organization has undertaken.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Heating value</th>
<th>MWh from renewable sources</th>
<th>MWh from non-renewable sources</th>
<th>Total MWh</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consumption of fuel (excluding feedstocks)</td>
<td></td>
<td>1,450,119</td>
<td>53,111,767</td>
<td>54,561,886</td>
</tr>
<tr>
<td>Consumption of purchased or acquired electricity</td>
<td></td>
<td>32,343</td>
<td>14,090,054</td>
<td>14,163,129</td>
</tr>
<tr>
<td>Consumption of purchased or acquired heat</td>
<td></td>
<td>958</td>
<td>958</td>
<td>1,915</td>
</tr>
<tr>
<td>Consumption of purchased or acquired steam</td>
<td></td>
<td>0</td>
<td>546</td>
<td>546</td>
</tr>
<tr>
<td>Consumption of purchased or acquired cooling</td>
<td></td>
<td>0</td>
<td>546</td>
<td>546</td>
</tr>
<tr>
<td>Consumption of self-generated non-fuel renewable energy</td>
<td></td>
<td>6,279,230</td>
<td></td>
<td>6,279,230</td>
</tr>
</tbody>
</table>
| Total energy consumption                               |               | 7,803,382                   | 67,203,326                     | 75,006,707    

C8.2a

(C8.2a) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Heating value</th>
<th>MWh from renewable sources</th>
<th>MWh from non-renewable sources</th>
<th>Total MWh</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consumption of fuel (excluding feedstock)</td>
<td>HHV (higher heating value)</td>
<td>1,450,119</td>
<td>53,111,767</td>
<td>54,561,886</td>
</tr>
<tr>
<td>Consumption of purchased or acquired electricity</td>
<td></td>
<td>32,343</td>
<td>14,090,054</td>
<td>14,163,129</td>
</tr>
<tr>
<td>Consumption of purchased or acquired heat</td>
<td></td>
<td>958</td>
<td>958</td>
<td>1,915</td>
</tr>
<tr>
<td>Consumption of purchased or acquired cooling</td>
<td></td>
<td>0</td>
<td>546</td>
<td>546</td>
</tr>
<tr>
<td>Consumption of self-generated non-fuel renewable energy</td>
<td></td>
<td>6,279,230</td>
<td></td>
<td>6,279,230</td>
</tr>
<tr>
<td>Total energy consumption</td>
<td></td>
<td>7,803,382</td>
<td>67,203,326</td>
<td>75,006,707</td>
</tr>
</tbody>
</table>
C8.2b

(C8.2b) Select the applications of your organization’s consumption of fuel.

<table>
<thead>
<tr>
<th>Consumption of fuel</th>
<th>Indicate whether your organization undertakes this fuel application</th>
</tr>
</thead>
<tbody>
<tr>
<td>for the generation of electricity</td>
<td>Yes</td>
</tr>
<tr>
<td>for the generation of heat</td>
<td>Yes</td>
</tr>
<tr>
<td>for the generation of steam</td>
<td>No</td>
</tr>
<tr>
<td>for the generation of cooling</td>
<td>No</td>
</tr>
<tr>
<td>for co-generation or tri-generation</td>
<td>Yes</td>
</tr>
</tbody>
</table>

C8.2c

(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

<table>
<thead>
<tr>
<th>Fuels (excluding feedstocks)</th>
<th>Heating value</th>
<th>Total fuel MWh consumed by the organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas</td>
<td>HHV (higher heating value)</td>
<td>44,910,148</td>
</tr>
<tr>
<td></td>
<td></td>
<td>MWh fuel consumed for self-generation of electricity</td>
</tr>
<tr>
<td></td>
<td></td>
<td>MWh fuel consumed for self-generation of heat</td>
</tr>
</tbody>
</table>
MWh fuel consumed for self-cogeneration or self-trigeneration
0

Comment
No Comment

Fuels (excluding feedstocks)
Landfill Gas

Heating value
HHV (higher heating value)

Total fuel MWh consumed by the organization
1,085,605

MWh fuel consumed for self-generation of electricity
1,085,605

MWh fuel consumed for self-generation of heat
0

MWh fuel consumed for self-cogeneration or self-trigeneration
0

Comment
No Comment

Fuels (excluding feedstocks)
Wood Waste
Heating value
HHV (higher heating value)

Total fuel MWh consumed by the organization
321,684

MWh fuel consumed for self-generation of electricity
0

MWh fuel consumed for self-generation of heat
66

MWh fuel consumed for self-cogeneration or self-trigeneration
321,619

Comment
No Comment

Fuels (excluding feedstocks)
Fuel Oil Number 2

Heating value
HHV (higher heating value)

Total fuel MWh consumed by the organization
741,293

MWh fuel consumed for self-generation of electricity
662,653

MWh fuel consumed for self-generation of heat
78,639

**MWh fuel consumed for self-cogeneration or self-trigeneration**

0

**Comment**

No Comment

---

**Fuels (excluding feedstocks)**

Fuel Oil Number 6

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

482,418

**MWh fuel consumed for self-generation of electricity**

482,418

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-cogeneration or self-trigeneration**

0

**Comment**

No Comment
Fuels (excluding feedstocks)
  Diesel

Heating value
  HHV (higher heating value)

Total fuel MWh consumed by the organization
  241,411

MWh fuel consumed for self-generation of electricity
  0

MWh fuel consumed for self-generation of heat
  241,411

MWh fuel consumed for self-cogeneration or self-trigeneration
  0

Comment
  Includes the diesel portion of our bio-diesel blends

Fuels (excluding feedstocks)
  Motor Gasoline

Heating value
  HHV (higher heating value)

Total fuel MWh consumed by the organization
  126,289

MWh fuel consumed for self-generation of electricity
MWh fuel consumed for self-generation of heat
126,289

MWh fuel consumed for self-cogeneration or self-trigeneration
0

Comment
Includes the gasoline portion of our ethanol blends

Fuels (excluding feedstocks)
Biodiesel

Heating value
HHV (higher heating value)

Total fuel MWh consumed by the organization
31,618

MWh fuel consumed for self-generation of electricity
0

MWh fuel consumed for self-generation of heat
31,618

MWh fuel consumed for self-cogeneration or self-trigeneration
0

Comment
Does not include the diesel percent of blended fuels
Fuels (excluding feedstocks)
   Bioethanol

Heating value
   HHV (higher heating value)

Total fuel MWh consumed by the organization
   11,211

MWh fuel consumed for self-generation of electricity
   0

MWh fuel consumed for self-generation of heat
   11,211

MWh fuel consumed for self-cogeneration or self-trigeneration
   0

Comment
   Does not include the gasoline percent of blended fuels

Fuels (excluding feedstocks)
   Propane Liquid

Heating value
   HHV (higher heating value)

Total fuel MWh consumed by the organization
   349
MWh fuel consumed for self-generation of electricity
0

MWh fuel consumed for self-generation of heat
349

MWh fuel consumed for self-cogeneration or self-trigeneration
0

Comment
No Comment

Fuels (excluding feedstocks)
Jet Kerosene

Heating value
HHV (higher heating value)

Total fuel MWh consumed by the organization
15,206

MWh fuel consumed for self-generation of electricity
0

MWh fuel consumed for self-generation of heat
15,206

MWh fuel consumed for self-cogeneration or self-trigeneration
0

Comment
No Comment

C8.2d

(C8.2d) List the average emission factors of the fuels reported in C8.2c.

Biodiesel

<table>
<thead>
<tr>
<th>Emission factor</th>
<th>9.45</th>
</tr>
</thead>
</table>

Unit

kg CO2 per gallon

Emission factor source

The Climate Registry Table 13.1 US Default CO2 Emission Factors for Transport Fuels

Comment

It should be noted that this factor is only used for the biofuel portion of the fuel and that the balance of the fuel would use the diesel emissions rate. Exelon uses several different blends of biodiesels in its operations. Associated NO2 and CH4 emissions are calculated separately.

Bioethanol

<table>
<thead>
<tr>
<th>Emission factor</th>
<th>5.75</th>
</tr>
</thead>
</table>

Unit

kg CO2 per gallon

Emission factor source

The Climate Registry Table 13.1 US Default CO2 Emission Factors for Transport Fuels

Comment
It should be noted that this factor is only used for the biofuel portion of the fuel and that the balance of the fuel would use the gasoline emissions rate. Exelon primarily uses 10% or 85% ethanol blends in its operations. Associated NO2 and CH4 emissions are calculated separately.

**Diesel**

<table>
<thead>
<tr>
<th>Emission factor</th>
<th>10.21</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Unit</strong></td>
<td>kg CO2 per gallon</td>
</tr>
</tbody>
</table>

**Emission factor source**
The Climate Registry Table 13.1 US Default CO2 Emission Factors for Transport Fuels

**Comment**
Associated NO2 and CH4 emissions are calculated separately.

**Fuel Oil Number 2**

<table>
<thead>
<tr>
<th>Emission factor</th>
<th>73.96</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Unit</strong></td>
<td>kg CO2 per million Btu</td>
</tr>
</tbody>
</table>

**Emission factor source**
EPA 40 CFR Part 98 Final Mandatory Reporting of Greenhouse Gases Rule Tables C-1 and AA-1

**Comment**
Direct measure of CO2 with Continuous Emissions Monitoring (CEMs) is available for some systems. Associated NO2 and CH4 emissions are calculated separately.
Emission factor
75.1

Unit
kg CO2 per million Btu

Emission factor source
EPA 40 CFR Part 98 Final Mandatory Reporting of Greenhouse Gases Rule Tables C-1 and AA-1

Comment
Direct measure of CO2 with Continuous Emissions Monitoring (CEMs) is available for some systems. Associated NO2 and CH4 emissions are calculated separately.

Jet Kerosene

Emission factor
9.75

Unit
kg CO2 per gallon

Emission factor source
The Climate Registry Table 13.1 US Default CO2 Emission Factors for Transport Fuels

Comment
Other portions of the calculations for aircraft emissions (i.e. LTO factors) come from IPCC Chapter 3 Energy, Civil Aviation; Associated NO2 and CH4 emissions are calculated separately.

Landfill Gas

Emission factor
52.07
**Unit**

- kg CO2 per million Btu

**Emission factor source**

- EPA 40 CFR Part 98 Final Mandatory Reporting of Greenhouse Gases Rule Tables C-1 and AA-1

**Comment**

Direct measure of CO2 with Continuous Emissions Monitoring (CEMs) is available for some systems. Associated NO2 and CH4 emissions are calculated separately.

**Motor Gasoline**

**Emission factor**

8.78

**Unit**

- kg CO2 per gallon

**Emission factor source**

- The Climate Registry Table 13.1 US Default CO2 Emission Factors for Transport Fuels

**Comment**

Associated NO2 and CH4 emissions are calculated separately.

**Natural Gas**

**Emission factor**

53.06

**Unit**

- kg CO2 per million Btu


**Emission factor source**
EPA 40 CFR Part 98 Final Mandatory Reporting of Greenhouse Gases Rule Tables C-1 and AA-1

**Comment**
Direct measure of CO2 with Continuous Emissions Monitoring (CEMs) is available for some systems. Associated NO2 and CH4 emissions are calculated separately.

**Propane Liquid**

<table>
<thead>
<tr>
<th>Emission factor</th>
<th>5.72</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit</td>
<td>kg CO2 per gallon</td>
</tr>
</tbody>
</table>

**Emission factor source**
The Climate Registry Table 13.1 US Default CO2 Emission Factors for Transport Fuels

**Comment**
Emission factor for propane will depend on whether it is for stationary or mobile combustion source. Associated NO2 and CH4 emissions are calculated separately.

**Wood Waste**

<table>
<thead>
<tr>
<th>Emission factor</th>
<th>204.91</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit</td>
<td>lb CO2 per short ton</td>
</tr>
</tbody>
</table>

**Emission factor source**
EPA 40 CFR Part 98 Final Mandatory Reporting of Greenhouse Gases Rule Tables C-1 and AA-1
Comment

Direct measure of CO2 with Continuous Emissions Monitoring (CEMs) is available for some systems. Associated NO2 and CH4 emissions are calculated separately.

**C8.2e**

(C8.2e) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

<table>
<thead>
<tr>
<th></th>
<th>Total Gross generation (MWh)</th>
<th>Generation that is consumed by the organization (MWh)</th>
<th>Gross generation from renewable sources (MWh)</th>
<th>Generation from renewable sources that is consumed by the organization (MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electricity</td>
<td>201,856,093</td>
<td>7,632,467</td>
<td>6,596,359</td>
<td>67,430</td>
</tr>
<tr>
<td>Heat</td>
<td>1,228,457</td>
<td>1,196,159</td>
<td>32,299</td>
<td>32,299</td>
</tr>
<tr>
<td>Steam</td>
<td>304,463</td>
<td>0</td>
<td>304,463</td>
<td>0</td>
</tr>
<tr>
<td>Cooling</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**C-EU8.2e**

(C-EU8.2e) For your electric utility activities, provide a breakdown of your total power plant capacity, generation, and related emissions during the reporting year by source.

**Coal – hard**

- **Nameplate capacity (MW)**
  
  0

- **Gross electricity generation (GWh)**
  
  0

- **Net electricity generation (GWh)**

  0
Absolute scope 1 emissions (metric tons CO2e) 
0

Scope 1 emissions intensity (metric tons CO2e per GWh)
0

Comment
Exelon has divested all previous ownership of coal assets.

Lignite

Nameplate capacity (MW)
0

Gross electricity generation (GWh)
0

Net electricity generation (GWh)
0

Absolute scope 1 emissions (metric tons CO2e)
0

Scope 1 emissions intensity (metric tons CO2e per GWh)
0

Comment
Exelon does not have this type of generation.
Nameplate capacity (MW)  
2,879

Gross electricity generation (GWh)  
1,382

Net electricity generation (GWh)  
1,292

Absolute scope 1 emissions (metric tons CO2e)  
943,577

Scope 1 emissions intensity (metric tons CO2e per GWh)  
730.52

Comment  
Includes both fully oil fired and dual fuel units (those that over the course of the year may burn both natural gas and fuel oil). Emissions intensity is based off of Net GWh generation.

Gas

Nameplate capacity (MW)  
6,586

Gross electricity generation (GWh)  
20,651

Net electricity generation (GWh)  
19,834

Absolute scope 1 emissions (metric tons CO2e)  
7,894,515
Scope 1 emissions intensity (metric tons CO2e per GWh)
398.04

Comment
Units that burn both natural gas and fuel oil have been included under oil units in this breakdown. Emissions intensity is based off of Net GWh generation.

Biomass

Nameplate capacity (MW)
46

Gross electricity generation (GWh)
71

Net electricity generation (GWh)
71

Absolute scope 1 emissions (metric tons CO2e)
1,484

Scope 1 emissions intensity (metric tons CO2e per GWh)
20.96

Comment
Plant referenced did not operate much of the year due to an unexpected outage. Emissions intensity is based on Net GWh generation and does not account for the additional steam benefits of this co-generation plant.

Waste (non-biomass)

Nameplate capacity (MW)
0
Gross electricity generation (GWh) 0
Net electricity generation (GWh) 0
Absolute scope 1 emissions (metric tons CO2e) 0
Scope 1 emissions intensity (metric tons CO2e per GWh) 0

Comment
Exelon does not have this type of asset.

Nuclear

Nameplate capacity (MW) 19,713
Gross electricity generation (GWh) 173,243
Net electricity generation (GWh) 166,569
Absolute scope 1 emissions (metric tons CO2e) 0
Scope 1 emissions intensity (metric tons CO2e per GWh) 0

Comment
Oyster Creek station retired in 2018.

**Geothermal**

- **Nameplate capacity (MW)**
  0

- **Gross electricity generation (GWh)**
  0

- **Net electricity generation (GWh)**
  0

- **Absolute scope 1 emissions (metric tons CO2e)**
  0

- **Scope 1 emissions intensity (metric tons CO2e per GWh)**
  0

**Comment**

Exelon does not own any geothermal generation stations.

**Hydroelectric**

- **Nameplate capacity (MW)**
  572

- **Gross electricity generation (GWh)**
  2,788

- **Net electricity generation (GWh)**
  2,788
Absolute scope 1 emissions (metric tons CO2e)
0

Scope 1 emissions intensity (metric tons CO2e per GWh)
0

Comment
This includes generation associated with Conowingo Hydroelectric plant. Per directions Muddy Run pumped storage facility has been omitted.

Wind

Nameplate capacity (MW)
945

Gross electricity generation (GWh)
2,825

Net electricity generation (GWh)
2,769

Absolute scope 1 emissions (metric tons CO2e)
0

Scope 1 emissions intensity (metric tons CO2e per GWh)
0

Comment
Name plate capacity is based on equity ownership at the end of the year.

Solar

Nameplate capacity (MW)
564
**Gross electricity generation (GWh)**
1,087

**Net electricity generation (GWh)**
1,086

**Absolute scope 1 emissions (metric tons CO2e)**
0

**Scope 1 emissions intensity (metric tons CO2e per GWh)**
0

**Comment**
No Comment

**Other renewable**

**Nameplate capacity (MW)**
78

**Gross electricity generation (GWh)**
230

**Net electricity generation (GWh)**
236

**Absolute scope 1 emissions (metric tons CO2e)**
7,198

**Scope 1 emissions intensity (metric tons CO2e per GWh)**
30.48

**Comment**
Includes Exelon's landfill gas generation sites. Exelon's Clinton battery is not included in the report out as it is not primary generation.

### Other non-renewable

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Nameplate capacity (MW)</td>
<td>0</td>
</tr>
<tr>
<td>Gross electricity generation (GWh)</td>
<td>0</td>
</tr>
<tr>
<td>Net electricity generation (GWh)</td>
<td>0</td>
</tr>
<tr>
<td>Absolute scope 1 emissions (metric tons CO2e)</td>
<td>0</td>
</tr>
<tr>
<td>Scope 1 emissions intensity (metric tons CO2e per GWh)</td>
<td>0</td>
</tr>
<tr>
<td>Comment</td>
<td>No Comment</td>
</tr>
</tbody>
</table>

### Total

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Nameplate capacity (MW)</td>
<td>31,383</td>
</tr>
<tr>
<td>Gross electricity generation (GWh)</td>
<td>202,278</td>
</tr>
<tr>
<td>Net electricity generation (GWh)</td>
<td>194,645</td>
</tr>
</tbody>
</table>
Absolute scope 1 emissions (metric tons CO2e)
8,846,773

Scope 1 emissions intensity (metric tons CO2e per GWh)
45.45

Comment
Because of the specific rules of the CDP reporting to exclude certain sources, there may be slight differences in how this compares to our other public disclosures. Specifically, Exelon does also have a 1070 MW capacity hydro pumped storage facility and a 10 MW battery storage facility that it typically includes in generation accounting in our Corporate Sustainability Report (CSR).

C8.2f
(C8.2f) Provide details on the electricity, heat, steam and/or cooling amounts that were accounted for at a low-carbon emission factor in the market-based Scope 2 figure reported in C6.3.

Basis for applying a low-carbon emission factor
Energy attribute certificates, Renewable Energy Certificates (RECs)

Low-carbon technology type
Wind

Region of consumption of low-carbon electricity, heat, steam or cooling
North America

MWh consumed associated with low-carbon electricity, heat, steam or cooling
73,075

Emission factor (in units of metric tons CO2e per MWh)
0
Comment

Green-e RECs retired for LEED Building certifications.

Basis for applying a low-carbon emission factor

Other, please specify

Emissions Free Energy Credits

Low-carbon technology type

Nuclear

Region of consumption of low-carbon electricity, heat, steam or cooling

North America

MWh consumed associated with low-carbon electricity, heat, steam or cooling

1,800,000

Emission factor (in units of metric tons CO2e per MWh)

0

Comment

Emissions Free Energy Certificates formally retired in the PJM Generation All-Attributes Tracking System to formally remove them from the PJM residual emissions rate. An additional 1,419,912 MWh of EFECs were also retired to cover the Muddy Run Pumped Storage facility pumping power, most of which is returned to the grid. Only the portion that is considered consumed has been included above.

Basis for applying a low-carbon emission factor

Contract with suppliers or utilities (e.g. green tariff), not supported by energy attribute certificates

Low-carbon technology type
Exelon fossil division maintains a contract with the PJM Interconnect grid operator to purchase electric needed at its generation stations when they are not otherwise generating electricity from other Exelon generation stations within the region that are operating (also known as Remote Self Supply). Because this generation is contractually coming from Exelon Generation, emissions associated with its generation are seen to have already been accounted for in our Scope 1 emissions.

Basis for applying a low-carbon emission factor
Power Purchase Agreement (PPA) without energy attribute certificates

Low-carbon technology type
Other low-carbon technology, please specify
Power Portfolio

Region of consumption of low-carbon electricity, heat, steam or cooling
North America

MWh consumed associated with low-carbon electricity, heat, steam or cooling
83,022

Emission factor (in units of metric tons CO2e per MWh)
0

Comment
Exelon fossil division maintains a contract with the PJM Interconnect grid operator to purchase electric needed at its generation stations when they are not otherwise generating electricity from other Exelon generation stations within the region that are operating (also known as Remote Self Supply). Because this generation is contractually coming from Exelon Generation, emissions associated with its generation are seen to have already been accounted for in our Scope 1 emissions.
Emission factor (in units of metric tons CO2e per MWh)
129.23

Comment
Exelon utilities BGE, PECO, Delmarva, ACE, and PEPCO procure off the open market a certain amount of Exelon Generation when it is the most cost-effect supply option for their customers. This amount of Exelon Generation is disclosure as part of each utility's annual FERC Form 1 report. In contract-based accounting, this contract is recognized and the Exelon Generation wholesale emissions rate (total supply less our owned generation already accounted for in Scope 1) for the Mid-Atlantic region is applied for the same percentage of their T&D line losses as the purchase is of their total load purchases. The balance of the power purchased is calculated at the PJM residual emission rate since no other Supplier specific emission factors are currently available.

Basis for applying a low-carbon emission factor
Power Purchase Agreement (PPA) without energy attribute certificates

Low-carbon technology type
Other low-carbon technology, please specify
Power portfolio

Region of consumption of low-carbon electricity, heat, steam or cooling
North America

MWh consumed associated with low-carbon electricity, heat, steam or cooling
1,566,896

Emission factor (in units of metric tons CO2e per MWh)
31.03

Comment
Exelon utility ComEd procures off the open market a certain amount of Exelon Generation when it is the most cost-effect supply option for their customers. This amount of Exelon Generation is disclosure as part of each utility's annual FERC Form 1 report. In contract-based accounting,
this contract is recognized and the Exelon Generation wholesale emissions rate (total supply less our owned generation already accounted for in Scope 1) for the Midwest region is applied for the same percentage of their T&D line losses as the purchase is of their total load purchases. The balance of the power purchased is calculated at the PJM residual emission rate since no other Supplier specific emission factors are currently available.

C-EU8.4

(C-EU8.4) Does your electric utility organization have a transmission and distribution business?
Yes

C-EU8.4a

(C-EU8.4a) Disclose the following information about your transmission and distribution business.

<table>
<thead>
<tr>
<th>Country/Region</th>
<th>United States of America</th>
</tr>
</thead>
<tbody>
<tr>
<td>Voltage level</td>
<td>Distribution (low voltage)</td>
</tr>
<tr>
<td>Annual load (GWh)</td>
<td>205,814</td>
</tr>
<tr>
<td>Scope 2 emissions (basis)</td>
<td>Market-based</td>
</tr>
<tr>
<td>Scope 2 emissions (metric tons CO2e)</td>
<td>4,626,758</td>
</tr>
<tr>
<td>Annual energy losses (% of annual load)</td>
<td></td>
</tr>
</tbody>
</table>
### 6.3

**Length of network (km)**  
259,419

**Number of connections**  
8,930,728

**Area covered (km2)**  
63,299

**Comment**  
The is includes the information of all Exelon Utilities combined. Exelon does own some transmission and this has been included in the above, as the majority of its system is distribution. Number of connections shown is the number of electric customers served by our combined utilities in 2018.

### C9. Additional metrics

**C9.1**

(C9.1) Provide any additional climate-related metrics relevant to your business.

<table>
<thead>
<tr>
<th>Description</th>
<th>Metric value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other, please specify</td>
<td>84,054</td>
</tr>
</tbody>
</table>

Percent of waste recycled
Metric numerator
Tons of potential municipal solid waste recycled

Metric denominator (intensity metric only)
Total tons of municipal solid waste generated

% change from previous year
2

Direction of change
Decreased

Please explain
Across our businesses, we are enacting best management practices to reduce, reuse and recycle the waste we generate. Through the efforts of our employees and contractors, we achieved a company-wide recycling rate for municipal solid waste of approximately 75 percent during 2018. Additionally, our utilities found beneficial outlets, including new construction materials and utility excavation backfill, for more than 399,000 tons of recovered materials, leading to an overall recycling rate of nearly 85 percent for the combined municipal and industrial solid waste we generated in 2018. During 2018, we also generated approximately 1,460 tons of hazardous waste, recycling more than 20 percent of these materials before they required highly regulated disposal.

In addition, many of our initiatives stop the generation of waste before it begins, including double-sided copies in the office, reusable totes in the field, contractor take-back programs and finding outlets for refurbished meters and computer electronics. Likewise, our extensive recycling programs target conventional materials like paper, plastic and metals as well as non-conventional materials such as construction and demolition debris. These programs not only keep waste out of landfills, but they also save money, conserve energy and natural resources and reduce GHG emissions.

C-OG9.3a

(C-OG9.3a) Disclose your total refinery throughput capacity in the reporting year in thousand barrels per year.

| Total refinery throughput capacity (Thousand barrels per day) |  |
**Capacity**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

**C-OG9.3b**

(C-OG9.3b) Disclose feedstocks processed in the reporting year in million barrels per year.

<table>
<thead>
<tr>
<th>Feedstock</th>
<th>Throughput (Million barrels)</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oil</td>
<td>0</td>
<td>Feedstocks are not applicable to our business</td>
</tr>
<tr>
<td>Other feedstocks</td>
<td>0</td>
<td>Feedstocks are not applicable to our business</td>
</tr>
<tr>
<td>Total</td>
<td>0</td>
<td>Feedstocks are not applicable to our business</td>
</tr>
</tbody>
</table>

**C-OG9.3c**

(C-OG9.3c) Are you able to break down your refinery products and net production?

Yes

**C-OG9.3d**

(C-OG9.3d) Disclose your refinery products and net production in the reporting year in million barrels per year.

<table>
<thead>
<tr>
<th>Product produced</th>
<th>Refinery net production (Million barrels) *not including products used/consumed on site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fuel oils</td>
<td>0</td>
</tr>
</tbody>
</table>

**C-EU9.5a**

(C-EU9.5a) Break down, by source, your total planned CAPEX in your current CAPEX plan for power generation.

<table>
<thead>
<tr>
<th>Primary power generation source</th>
<th>CAPEX planned for power generation from this source</th>
<th>Percentage of total CAPEX planned for power generation</th>
<th>End year of CAPEX plan</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Products and services</td>
<td>Description of product/service</td>
<td>CAPEX planned for product/service</td>
<td>Percentage of total CAPEX planned products and services</td>
<td>End of year CAPEX plan</td>
</tr>
<tr>
<td>-------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------</td>
<td>----------------------------------------------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Other, please specify</td>
<td>Exelon invested $5.3 billion across its regulated utilities in 2018 and plans to invest approximately $23 billion in our utilities from 2019 through 2022. Of this approximately 15.5 billion will be invested specifically in the electrical distribution systems. Across our utilities, we have installed, or plan to install, smart meters at customer properties to support smart grid operations (with over 10 million installed as of December 2018). Smart meters not only help customers manage energy use, but they also allow for better integration of distributed energy resources (such as solar photovoltaics at homes and businesses) into the grid. As a result, we can provide more detailed usage information to customers from smart meter data and we supplement this with programs that encourage conservation and energy savings. Smart meters also facilitate improved customer service and smart grid operations. Utilities are able to utilize data from smart meters to more quickly deploy solutions to customer inquiries,</td>
<td>23,000,000,000</td>
<td>100</td>
<td>2022</td>
</tr>
</tbody>
</table>
including for remote service connect or disconnect. This in turn reduces the utility’s fuel consumption, lowering GHG emissions. In 2018, Exelon utilities avoided over 750,000 service truck connect/disconnect trips through the use of smart meters, up from 658,000 in 2017. When outages do occur, the new metering technology significantly aids response time and allows for quicker and more targeted restoration work during storms or other power disturbances. Over the coming years, we expect to leverage smart meter data in increasingly innovative ways to improve service to customers.

Due to the structure of our industry, Exelon’s utilities are generally unable to directly invest in and own power generation resources. However, the smart meter technology we are installing also helps to integrate local generation. Exelon’s utilities enabled almost 103,688 customers to connect 1,232 MW of local renewable generation to the emerging smart grid, and we continue to work on ways to assist customers in connecting local resources to the grid. Exelon’s utilities are also evaluating potential actions to evolve their business models and state regulatory frameworks so they can play an even more significant and central role in enabling renewable energy integration into the emerging smart grid.

C-CO9.6/C-EU9.6/C-OG9.6

(C-CO9.6/C-EU9.6/C-OG9.6) Disclose your investments in low-carbon research and development (R&D), equipment, products, and services.
Investment start date
March 1, 2016

Investment end date
December 31, 2018

Investment area
R&D

Technology area
Carbon capture and storage/utilisation

Investment maturity
Pilot demonstration

Investment figure
140,000,000

Low-carbon investment percentage
81-100%

Please explain
In March 2016, NET Power, Exelon Generation, CB&I and 8 Rivers Capital broke ground on a 50-MW plant to demonstrate supercritical carbon dioxide (sCO2) cycle technology that offers higher density and competitive thermal efficiencies versus conventional steam- and turbine-driven power generation technologies without producing atmospheric emissions. Construction of the demonstration project was largely completed during 2017, with early startup completed in the third quarter of 2018. The NET Power project, located in La Porte, Texas, uses Allam Cycle technology to combust natural gas with pure oxygen and high pressure sCO2 as a working fluid to drive a combustion turbine. The CO2 that the NET Power plants generate from burning fuel is produced as a high-pressure, high quality byproduct, ready for pipeline transportation and storage. In many places, this CO2 can be sold for use in enhanced oil recovery, permanently sequestering the CO2 and providing significant added value for NET Power plant owners. This investment is an example of
Exelon’s continued focus on finding new technologies to provide customers with low-carbon energy solutions. The $140 million project, which includes technology development, plant design and constructions and a full testing and operations program, is funded by a combination of cash and in-kind contributions from Exelon and CB&I. More information is available at www.netpower.com.

C-OG9.7

(C-OG9.7) Disclose the breakeven price (US$/BOE) required for cash neutrality during the reporting year, i.e. where cash flow from operations covers CAPEX and dividends paid/ share buybacks.

0

C-OG9.8

(C-OG9.8) Is your organization involved in the sequestration of CO2?

Yes

C-OG9.8a

(C-OG9.8a) Provide, in metric tons CO2, gross masses of CO2 transferred in and out of the reporting organization (as defined by the consolidation basis).

<table>
<thead>
<tr>
<th></th>
<th>CO2 transferred – reporting year (metric tons CO2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO2 transferred in</td>
<td>0</td>
</tr>
<tr>
<td>CO2 transferred out</td>
<td>0</td>
</tr>
</tbody>
</table>

C-OG9.8b

(C-OG9.8b) Provide gross masses of CO2 injected and stored for the purposes of CCS during the reporting year according to the injection and storage pathway.
## Injection and storage pathway

<table>
<thead>
<tr>
<th>Injection and storage pathway</th>
<th>Injected CO2 (metric tons CO2)</th>
<th>Percentage of injected CO2 intended for long-term (&gt;100 year) storage</th>
<th>Year in which injection began</th>
<th>Cumulative CO2 injected and stored (metric tons CO2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other, please specify</td>
<td>0</td>
<td>0</td>
<td>January 5, 2018</td>
<td>0</td>
</tr>
<tr>
<td>Pilot New Generation Technology● Pilot New Generation TechnologyPilot o</td>
<td>0</td>
<td>0</td>
<td></td>
<td>0</td>
</tr>
</tbody>
</table>

### C-OG9.8c

(C-OG9.8c) Provide clarification on any other relevant information pertaining to your activities related to transfer and sequestration of CO2.

Exelon constantly seeks new technologies to provide customers with low-carbon energy solutions. One example is the NET Power project, located in LaPorte, Texas. The project uses Allam Cycle technology to combust natural gas with pure oxygen and uses high-pressure supercritical carbon dioxide (sCO2) as a working fluid to drive a combustion turbine. The NET Power plant technology produces a high quality CO2 byproduct, ready for pipeline transportation and storage. In many locations, this CO2 could be sold for use in enhanced oil recovery, permanently sequestering the CO2 and providing significant added value to future plants that use this technology. In March 2016, NET Power, Exelon Generation, McDermott and 8 Rivers Capital broke ground on a 50-MWth plant to demonstrate sCO2 cycle technology. This technology offers higher density and competitive thermal efficiencies versus conventional steam- and turbine-driven power generation technologies without producing atmospheric emissions. Construction of the demonstration project was completed in 2017, and combustor testing and Balance of Plant startup completed in August 2018. The turbine testing phase began in November 2018 and first fire was achieved with the integrated turbine and combustor in December 2018. The turbine testing phase will complete in 2019. In November 2018, the NET Power project received the 2018 Breakthrough Technological Project of the Year award at the Abu Dhabi International Petroleum Exhibition and Conference (ADIPEC). ADIPEC is one of the world’s largest and most influential oil and gas events. More information is available at www.netpower.com.
C10. Verification

C10.1

(C10.1) Indicate the verification/assurance status that applies to your reported emissions.

<table>
<thead>
<tr>
<th>Scope</th>
<th>Verification/assurance status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scope 1</td>
<td>Third-party verification or assurance process in place</td>
</tr>
<tr>
<td>Scope 2 (location-based or market-based)</td>
<td>Third-party verification or assurance process in place</td>
</tr>
<tr>
<td>Scope 3</td>
<td>Third-party verification or assurance process in place</td>
</tr>
</tbody>
</table>

C10.1a

(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 and/or Scope 2 emissions and attach the relevant statements.

Scope
Scope 1

Verification or assurance cycle in place
Annual process

Status in the current reporting year
Complete

Type of verification or assurance
Reasonable assurance
Attach the statement

Exelon  EY2018_TCR-EPS-Verification-Statement-TRsigned-signed.pdf

Page/ section reference
Page 2 - Total Entity-Wide Emissions Verified (Equity Share Criteria)

Relevant standard
The Climate Registry's General Verification Protocol

Proportion of reported emissions verified (%)
100

Scope
Scope 2 location-based

Verification or assurance cycle in place
Annual process

Status in the current reporting year
Complete

Type of verification or assurance
Reasonable assurance

Attach the statement

Exelon  EY2018_TCR-EPS-Verification-Statement-TRsigned-signed.pdf

Page/ section reference
Relevant standard
The Climate Registry's General Verification Protocol

Proportion of reported emissions verified (%)
100

Scope
Scope 2 market-based

Verification or assurance cycle in place
Annual process

Status in the current reporting year
Complete

Type of verification or assurance
Reasonable assurance

Attach the statement

Exelon EY2018_TCR-EPS-Verification-Statement-TRsigned-signed.pdf

Page/section reference
Page 2 - Total Entity-Wide Emissions Verified (Equity Share Criteria)

Relevant standard
The Climate Registry's General Verification Protocol

Proportion of reported emissions verified (%)

C10.1b

(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

---

**Scope**
- Scope 3 - at least one applicable category

**Verification or assurance cycle in place**
- Annual process

**Status in the current reporting year**
- Complete

**Attach the statement**

- [CY18 Exelon Scope 3 Assurance Statement-FINALver2.pdf](#)

**Page/section reference**
- Whole document. Provides verification for the relevant categories Exelon is current calculating.

**Relevant standard**
- ISO14064-3

---

C10.2

(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?
### C10.2a

(C10.2a) Which data points within your CDP disclosure have been verified, and which verification standards were used?

<table>
<thead>
<tr>
<th>Disclosure module verification relates to</th>
<th>Data verified</th>
<th>Verification standard</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>C4. Targets and performance</td>
<td>Other, please specify Generation emissions intensity</td>
<td>TCR Electric Sector Protocol</td>
<td>Verification of the CO2, NOx and SO2 emissions from our owned generation per MWh that generation delivers to the grid.</td>
</tr>
<tr>
<td>C12. Engagement</td>
<td>Other, please specify Supply Specific Emissions Factors for our Constellation retail customers</td>
<td>TCR Electric Sector Protocol</td>
<td>Verification of Constellation customer electricity CO2/MWh by state (based on contractual supply)</td>
</tr>
<tr>
<td>C5. Emissions performance</td>
<td>Other, please specify Adjusted Baseline after acquisition</td>
<td>TCR / ISO 14064–3</td>
<td>Exelon acquired PHI and divested several generation plants, thus we revised and verified a new baseline for measuring performance.</td>
</tr>
<tr>
<td>C12. Engagement</td>
<td>Other, please specify EFEC Retirement</td>
<td>ISO 14064–3</td>
<td>Exelon third-party verifies the retirement of the Emissions Free Energy Credits (EFECs) it retires on behalf of its customers that have specifically requested it. Attached is the verification of those retired for Exelon’s own corporate goal. Others done for customers for use at the discretion of the customers that purchased that product.</td>
</tr>
</tbody>
</table>

1 CY18 Exelon Air Intensity Assurance Statement-ASRauthorized.pdf
2 CY18 Exelon CNE Supplier Specific Assurance Statement-ASRauthorized.pdf
C11. Carbon pricing

C11.1

(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?
Yes

C11.1a

(C11.1a) Select the carbon pricing regulation(s) which impacts your operations.
RGGI

C11.1b

(C11.1b) Complete the following table for each of the emissions trading systems in which you participate.

<table>
<thead>
<tr>
<th>System</th>
<th>% of Scope 1 emissions covered by the ETS</th>
<th>Period start date</th>
<th>Period end date</th>
</tr>
</thead>
<tbody>
<tr>
<td>RGGI</td>
<td>22</td>
<td>January 1, 2018</td>
<td>December 31, 2018</td>
</tr>
</tbody>
</table>
Allowances allocated
0

Allowances purchased
2,076,588

Verified emissions in metric tons CO2e
2,076,588

Details of ownership
Facilities we own and operate

Comment
Represents 2018 CO2 emissions covered by RGGI rules that will be covered by our RGGI compliance strategy.

C11.1d

(C11.1d) What is your strategy for complying with the systems in which you participate or anticipate participating?
Exelon supports and advocates for more meaningful prices on carbon emissions. For our own emitting facilities, Exelon operates in compliance with those regulations where they exist and apply to our facilities. The RGGI program covers fossil fuel electricity generation facilities larger than 25 MW in participating states, which includes Exelon’s Mystic and Medway generation stations. RGGI requires that we surrender allowances (1 allowance permits 1 short ton of emissions) equal to our facilities’ CO2 emissions over the three-year control or compliance period. The current compliance cycle (fourth control period) is for 2018 through 2020. Compliance is evaluated at the end of each three-year control period, with interim requirements. Exelon purchases allowances based on estimated emissions from our generation planning process and carries forward any additional allowances that are not needed for meeting actual obligations, which are determined by the actual year end emissions resulting from each plant’s operation. We purchase our compliance needs in the auctions or through the market as needed to meet the regulatory deadlines. Our overall impact from RGGI is positive since our generation fleet is largely emissions-free and therefore, the allowance cost adder turns out to result in a competitive advantage for our generation business in the RGGI region.
C11.2

(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?

No

C11.3

(C11.3) Does your organization use an internal price on carbon?

Yes

C11.3a

(C11.3a) Provide details of how your organization uses an internal price on carbon.

Objective for implementing an internal carbon price

- Navigate GHG regulations
- Stress test investments

GHG Scope

- Scope 1

Application

Exelon uses a cost on carbon in its market fundamentals analysis to guide our investments in new and existing electric generation projects and help to guide the implementation of our strategic plan. Exelon typically models a number of wholesale power price scenarios based on a combination of factors including fossil fuel prices, economic growth, and the effects of state and federal policies. To inform management of the long-term potential impacts and opportunities of carbon policy for our generation fleet, Exelon models policy scenarios through a 2040 time frame.

Actual price(s) used (Currency /metric ton)
Variance of price(s) used
In regions with existing GHG policies, such as the Regional Greenhouse Gas Initiative, Exelon uses current and projected market prices for emissions allowances. In RGGI trading prices in 2018 were in the $4.00-$5.00 per ton range and in the CA Cap and Trade program they were closer to $15.00 per ton. Using these and other considerations, we run various scenarios of how carbon pricing may impact our generation business or investments now and into the future.

Type of internal carbon price
Shadow price

Impact & implication
Exelon generates more than twice as much carbon-free electricity as any other company in the U.S. With regard to internal decision-making, we continually conduct near- and long-term modeling to best determine and inform our daily electric market positions, near-term generation portfolio management, and generation investment and new build development decisions. Our Market Fundamentals organization identifies and regularly reviews key market drivers, including potential regulatory or policy influences such as a price on carbon, and use them in our ongoing analysis to capture a range of plausible future outcomes and develop our overall generation strategy. Regulation of carbon (or not) is one of many considerations in our planning models (to include current, anticipated or plausible regulations or lack thereof), and results are weighed with other issues that may affect market conditions.

C12. Engagement

C12.1

(C12.1) Do you engage with your value chain on climate-related issues?
Yes, our suppliers
Yes, our customers
Yes, other partners in the value chain
C12.1a

(C12.1a) Provide details of your climate-related supplier engagement strategy.

<table>
<thead>
<tr>
<th>Type of engagement</th>
<th>Compliance &amp; onboarding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Details of engagement</td>
<td>Included climate change in supplier selection / management mechanism</td>
</tr>
<tr>
<td></td>
<td>Climate change is integrated into supplier evaluation processes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>% of suppliers by number</th>
<th>100</th>
</tr>
</thead>
<tbody>
<tr>
<td>% total procurement spend (direct and indirect)</td>
<td>100</td>
</tr>
<tr>
<td>% Scope 3 emissions as reported in C6.5</td>
<td>0.01</td>
</tr>
</tbody>
</table>

**Rationale for the coverage of your engagement**

Exelon is active in industry and government efforts to improve supply chain operations and cognizant of the influence we can have toward sustainable practices given our position as a large purchaser. We evaluate and monitor all of our suppliers for potential environmental impacts as part of entry into our e-sourcing process. Our rationale for targeting all suppliers is that we need to understand our supply chain and how it may either impact the environment or be affect as a result of new environmental regulations or requirements. This engagement is accomplished when any supplier is invited for a bid, as they must answer the screening questions on our e-sourcing tool. Based on their answers, suppliers receive a score weighted by price, quality, safety, diversity and environmental performance. The standard set of environmental questions on every RFP are meant to capture risks associated with environmental compliance and climate change issues prior to contracting. The questions also help to inform additional supplier engagement that may be needed for certain critical supply chain items with regard to managing environmental risk or climate change resilience.
We advance sustainability in our supply chain through both our direct relationships with our suppliers and our engagement with the Electric Utility Industry Sustainable Supply Chain Alliance (EUISSCA) of which Exelon was a founding member. EUISSCA, or “The Alliance”, is an organization of utilities and suppliers working together to advance sustainability best practices in utility supply chain activities and supplier networks. Exelon continues to pursue progress against the Alliance’s sustainability maturity model by creating more rigor around the scoring of sustainability aspects of supplier proposals in bids and by recognizing top suppliers with awards related to their environmental performance. As part of the Alliance in 2018, Exelon worked with 15 other utilities to drive sustainability through the development of voluntary standards for products, as well as the coordination of supplier sustainability performance surveys, educational materials for buyers and suppliers and speaking engagements at major supply chain events. In 2018, Exelon was represented on the Alliance’s executive committee serving in the role of Vice Chair, automatically ascending to the role of Chair in 2019.

**Impact of engagement, including measures of success**

Success of this engagement is measured by the number of suppliers responding to these questions each year as part of this process. We view the effort taken by suppliers to complete the questions as part of the awareness building process, setting the stage for the high environmental standards set by Exelon. In 2018, the questionnaire was completed by 2,058 unique suppliers as part of various bid events (note that suppliers already in the system or under longer term contracts do not always need to complete the survey for each project the work on with us).

As a result of our supplier engagement efforts, we have also implemented a number of best practices and communicate high level environmental expectations in contract language and in a suppliers’ code of conduct. For example, when applicable, we specify in contracts that vendors take back recyclable materials and properly dispose of waste products. All Exelon business partners, including our suppliers are required to comply with Exelon’s Code of Business Conduct, which establishes requirements for how Exelon and our business partners will conduct their business operations. All suppliers must meet Exelon’s standards, including environmental performance review. At Exelon, we make a concerted effort to minimize potential impacts of the goods and services we procure and to motivate our suppliers to improve their operational performance.

We are still in the process of developing a quantification method for our upstream Scope 3 emissions associated with Goods and Services, which would be the emissions associated with the operations of these Suppliers - however, we do calculate the downstream emissions associated with our waste management, which is indirectly impacted by the supplier relationships and focus on waste minimization established through this engagement. Waste emissions make up 0.01% of the Scope 3 emissions currently calculated.
Comment
No Comment

Type of engagement
Information collection (understanding supplier behavior)

Details of engagement
Other, please specify
Collect and review business continuity planning, including potential impacts from climate change

% of suppliers by number
2

% total procurement spend (direct and indirect)
54

% Scope 3 emissions as reported in C6.5
0

Rationale for the coverage of your engagement
Exelon employs a risk management process developed by our Supply and Enterprise Credit Risk Management team to identify, communicate and mitigate risks. Our semiannual review of all suppliers determines supplier criticality to our business. This team conducts in-depth risk reviews of our critical suppliers, considering how essential the supplier is to Exelon’s business functions and company objectives (such as diversity and sustainability), probability of a risk event, the potential severity of impacts and our resilience to a disruption through alternate suppliers. Our rationale is to make sure we understand what elements of our supply chain could have the great impact on our operations if disruption were to occur. The results of these risk reviews are regularly communicated to management.

In December 2018, Exelon conducted its semiannual detailed risk assessment that identified 96 critical Tier 1 suppliers, representing 54 percent of total spend. It is this group of suppliers that we target for more in depth engagement around business continuity issues, including potential impacts associated with climate change.
Impact of engagement, including measures of success
As part of this process, we identified two high-risk critical Tier 1 suppliers and implemented risk mitigation strategies with these suppliers. Of the 96 critical Tier 1 suppliers, six percent were audited in 2018 and five percent were on a supplier watchlist or performance improvement plan in 2018. Exelon actively works with all suppliers on a watchlist or with a performance improvement plan to implement corrective action strategies to remediate any performance issues.

We are still in the process of developing a quantification method for our upstream Scope 3 emissions associated with Goods and Services, which would be the emissions associated with the operations of these Suppliers. We are exploring opportunities to add GHG emissions information to our annual engagement. At this time, we do calculate the downstream emissions associated with our waste management, which is indirectly impacted by the supplier relationships and focus on waste minimization established through this engagement. Waste emissions make up 0.01% of the Scope 3 emissions currently calculated.

Comment
No Comment

Type of engagement
Engagement & incentivization (changing supplier behavior)

Details of engagement
Run an engagement campaign to educate suppliers about climate change
Other, please specify
new supplier survey tool designed to educate suppliers on environmental best practices and benchmark their sustainability progress

% of suppliers by number
2

% total procurement spend (direct and indirect)
50

% Scope 3 emissions as reported in C6.5
Rationale for the coverage of your engagement

In 2018, EUISSCA launched The Sustainability Project (TSP), a new supplier survey tool designed to educate suppliers on environmental best practices and benchmark their sustainability progress. As a member of EUISSCA, Exelon participated in the piloting of the project. The survey tool has customized questions for over 23 supplier types that ask a variety of questions, from the details of a supplier’s operational controls to the level of leadership engagement and commitment. It also offers benchmarking which enables suppliers to plan for improved performance in the future and can be used for sharing best practices.

Exelon targeted 93 of its critical Tier I suppliers (as identified by our risk profile model), representing approximately 50 percent of our spend, to take the TSP Survey in the fall of 2018. We are using the results of the survey to help us further identify sustainability risks associated with our current suppliers and potential future business partners.

Impact of engagement, including measures of success

Exelon EUISSCA/TSP Supplier Survey Results are as follows: 93 Exelon suppliers were targeted to complete the TSP Survey. Of those, 57 suppliers completed the Survey, representing 61%; 23 suppliers completed the Survey, Assessment Phase and Planning Phase, representing 25%; 14 suppliers completed the Survey, Assessment Phase and have started the Improvement Planning process, representing 15%; and 20 suppliers completed only the Survey and Assessment Phase, representing 22%.

Of the suppliers invited to participate, 36 did not. Those that did not have been contacted to confirm Exelon’s expectation that they participate. The survey, which is tailored to different categories of suppliers, focuses on an initial assessment of performance and programs, with benchmarking and other tools provided to aid in the identification and implementation of performance improvement opportunities. This effort helps Exelon to work collaboratively with its suppliers to advance sustainability performance in the most relevant areas for each type of supplier and the services or materials that they are providing to Exelon. Exelon is currently in the process of reviewing the results more fully as part of the pilot evaluation process.

Comment

No Comment
**C12.1b**

(C12.1b) Give details of your climate-related engagement strategy with your customers.

---

**Type of engagement**
Education/information sharing

**Details of engagement**
Run an engagement campaign to educate customers about the climate change impacts of (using) your products, goods, and/or services

**% of customers by number**
100

**% Scope 3 emissions as reported in C6.5**
19

**Please explain the rationale for selecting this group of customers and scope of engagement**
Exelon's retail electric sales organization, Constellation New Energy began to provide Supplier specific emissions factors and enhanced communications around its voluntary renewable energy credit (REC) and Emissions Free Energy Credits (EFECs) with its Commercial and Industrial (C&I) customers in response to increased interest in GHG emissions reduction and renewable energy commitments associated with the Paris Agreement. The engagement was first extended to all C&I customers, making available third-party verified supplier specific emission factors to assist with Scope 2 accounting, as well as assistance for customers in understanding the new WRI Scope 2 reporting and how to incorporate our new clean energy products such as Carbon-Free (nuclear supply) and CORe (easy access renewable packaged PPAs) that can help them to reach their climate change goals. CNE is now exploring how these products can also be offered to other customer classes. This program highlights Exelon's low carbon generation portfolio and shows our customers how our product can assist in their efforts to reduce GHG emissions. These efforts relate directly to Upstream Energy related emissions associated with the purchased power needed to fulfill our customer load commitments. Upstream Energy related Scope 3 emissions accounts for 19% of the emissions reported in C6.5.

**Impact of engagement, including measures of success**
In 2018, Exelon’s Constellation New Energy retail electric business successfully marketed 3.2 million RECs for voluntary retirement by their C&I customers, equivalent to avoided emissions of over 1.6 million metric tonnes of GHG emissions. Also, since the Carbon-Free EFEC program began in June 2016 and as of May 25, 2018, 378 CNE C&I customers committed to covering 13.6 TWh of load with nuclear EFECs in support of continuing this zero-carbon generation resource supply on the grid. The success of this program is measured by the continued sales of the product and through one on one calls with our customers to ensure we are meeting their needs for GHG reporting.

**Type of engagement**
Education/information sharing

**Details of engagement**
Run an engagement campaign to educate customers about the climate change impacts of (using) your products, goods, and/or services

**% of customers by number**
100

**% Scope 3 emissions as reported in C6.5**
80

**Please explain the rationale for selecting this group of customers and scope of engagement**
Exelon’s utilities are helping customers save energy and reduce their monthly bills by providing them with the tools necessary to allow them to take control of their energy usage that will make their homes and businesses more efficient. These tools include a variety of energy efficiency, real-time pricing and smart usage rewards programs available to all customers served by our distribution utilities.

**Impact of engagement, including measures of success**
In 2018, through the results of a combination of new and prior-year investments, our Exelon utilities helped customers save over 21.9 million MWh of energy through the ComEd and PECO Smart Ideas® programs, BGE Smart Energy Savers Program® and PHI Home Energy Savings Program®. This equates to over 9.7 million metric tons of CO2e emissions avoided. These programs encourage customer savings through home energy audits, lighting discounts, appliance recycling, home improvement rebates, equipment upgrade incentives and new innovative programs like smart thermostats and combined heat and power (CHP) programs.
**C12.1c**

**(C12.1c) Give details of your climate-related engagement strategy with other partners in the value chain.**

Every year, we facilitate specialized forums with individual stakeholder groups to discuss their sustainability interests and concerns to incorporate findings in our business and sustainability planning. For example, we engaged with Ceres, a nonprofit organization advocating for sustainability leadership, since 2008. Ceres provides an external perspective on key issues to help Exelon advance our sustainability performance. As part of the engagement, Ceres convened a group of external stakeholders and Exelon participants in April 2018 to participate in a structured feedback session. The session covered the sustainability-related aspects of our corporate strategic plan, as well as our sustainability performance and reporting activities and key areas of concern such as climate change. (https://www.exeloncorp.com/sustainability/Documents/Ceres%20Response.pdf).

Additionally, we engaged with RobecoSAM, an international investment company with a specific focus on sustainability investments, on our DJSI scorecard and with CDP, an organization running the global disclosure system for investors, companies, cities, states and regions to manage their environmental impacts, on our disclosure results to better understand scoring and areas for improvement. Our operating companies also participated in dozens of stakeholder engagement activities related to specific local issues.

In recent years, investors have sought more information about how companies manage climate and sustainability risks. In response, Exelon engaged with more than 20 institutional investors in 2018 on the issues of climate change and other sustainability topics. We will continue engaging with investors and communities in the coming years to ensure our climate strategies align with our business and societal needs.

As Exelon continually seeks to build deeper and more meaningful relationships with our stakeholders, we need to know what our stakeholders expect of us and how we can meet those expectations. Exelon conducted research among various stakeholder audiences across our businesses and markets. In 2017, we launched a comprehensive research initiative to understand how we can better meet stakeholder needs. We have conducted extensive qualitative (focus groups and in-depth interviews) and quantitative research (online and telephone surveys). Through the end of 2018, we conducted 725 qualitative interviews and 11,649 quantitative survey interviews across all stakeholders and markets. The research included the following key stakeholder audiences:

- **Customers.** Separate from our regular surveys on customer satisfaction, we conducted a broader investigation into the deeper expectations of customers on how we operate and address critical issues. We interviewed residential utility customers in each of our service territories. In addition to our residential utility customers in each of our service territories, we interviewed current and potential Constellation customers.
• Communities. We interviewed more than 1,700 people who live in our 34 plant communities (people who live within 10 miles of an Exelon Generation facility).
• Policy Leaders. We interviewed a wide range of elected officials or senior staff for federal, state, county and municipal governments. We also interviewed non-governmental organizations and activists who focus on key issues affecting our business.
• Investors & Analysts. Professionals who invest in or cover the energy sector were also included in our research.
• Employees. Finally, we interviewed a representative sample of all our employees across all of our operating companies.

One of the most important insights gleaned from the research is how the expectations of our stakeholders differ from their expectations of most other businesses. Because of the unique relationship we have with our customers and communities — the “universality” of our utilities business — expectations on our social and environmental impacts are heightened compared to other consumer product companies. We are viewed as both a business that serves individual customers as well as a public service that serves a community. Therefore, we must balance the changing needs of customers with a commitment to addressing social and environmental challenges.

C12.3

(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?
   Direct engagement with policy makers
   Trade associations
   Funding research organizations

C12.3a

(C12.3a) On what issues have you been engaging directly with policy makers?

<table>
<thead>
<tr>
<th>Focus of legislation</th>
<th>Corporate position</th>
<th>Details of engagement</th>
<th>Proposed legislative solution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other, please specify</td>
<td>Support</td>
<td>Direct communication with legislators and regulators, as well as broadly through our investor and stakeholder materials such as Exelon believes that a federal policy that places a value on carbon emissions would be the most efficient solution. Incorporating the cost of carbon emissions into the generation unit dispatch would be the most</td>
<td></td>
</tr>
</tbody>
</table>
### C12.3b

(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership?

Yes

### C12.3c

(C12.3c) Enter the details of those trade associations that are likely to take a position on climate change legislation.

**Trade association**

Edison Electric Institute

**Is your position on climate change consistent with theirs?**

Consistent
Please explain the trade association's position
Global climate change presents one of the biggest energy and environmental policy challenges this country has ever faced. EEI member companies are committed to addressing the challenge of climate change and have undertaken a wide range of initiatives over the last 30 years to reduce, avoid or sequester GHG emissions. Policies to address climate change should seek to minimize impacts on consumers and avoid harm to U.S. industry and the economy.

How have you influenced, or are you attempting to influence their position?
Exelon consistently supports an effective price on carbon emissions and use of competitive markets to value carbon equally across all technologies and would do so in this forum as well. Exelon supports regulatory efforts to price carbon emissions properly.

Trade association
Nuclear Energy Institute

Is your position on climate change consistent with theirs?
Consistent

Please explain the trade association's position
Reducing carbon dioxide emissions, while fostering sustainable development, is a major global challenge of the 21st century. Nuclear energy is a vital source of electricity that can meet the nation's growing energy needs with a secure, domestic energy supply that also protects our air quality.

How have you influenced, or are you attempting to influence their position?
Exelon consistently supports an effective price on carbon emissions and use of competitive markets to value carbon equally across all technologies and would do so in this forum as well. Exelon supports regulatory efforts to price carbon emissions properly, and has encouraged NEI to be more vocal on these issues.

Trade association
Center for Climate and Energy Solutions
Is your position on climate change consistent with theirs?
Consistent

Please explain the trade association’s position
The Center for Climate and Energy Solutions is as a non-profit, non-partisan, and independent organization dedicated to providing credible information, straight answers, and innovative solutions in the effort to address global climate change. The Center engages business leaders, policy makers, and other key decision makers at the international, national, regional, and state levels to advance meaningful, cost-effective climate policy and action.

How have you influenced, or are you attempting to influence their position?
Exelon consistently supports an effective price on carbon emissions and use of competitive markets to value carbon equally across all technologies and would do so in this forum as well. Exelon supports regulatory efforts to price carbon emissions properly.

C12.3d

(C12.3d) Do you publicly disclose a list of all research organizations that you fund?
No

C12.3f

(C12.3f) What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?
Exelon maintains a Government and Regulatory Affairs and Public Policy department to ensure that we stay up to date and involved in regulatory and policy activities relating to clean energy and other climate change issues. We have specialist on the federal level, as well as those focused specifically on state and the utility jurisdiction level. Exelon’s Executive Vice President of Government and Regulatory Affairs and Public Policy is responsible for the development and coordination of the Corporation’s overall position on various policies which may affect our businesses and works with executives across all operating companies to maintain alignment with more local issues. Policy coordination is also part of Exelon’s strategic planning process, with our strategy periodically reviewed by the Exelon Executive Committee.
Exelon’s Government and Regulatory Affairs and Public Policy Department also works closely with the Corporate Strategy Department with regards to developments in industry trends and ongoing climate change analysis that may influence our public position or engagement efforts. Every year with the production of our Corporate Sustainability report, a review board is established with representation across the company to capture and share all related activities. This structured process also helps to ensure that our direct and indirect activities that influence policy are consistent with our overall clean energy and climate change strategy.

C12.4

(C12.4) Have you published information about your organization’s response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Publication
In mainstream reports

Status
Complete

Attach the document

2018 Exelon 10-K.pdf

Page/Section reference
Exelon 10-K: Page 24-25; 31-32; 39-43; 89-90; 95

Content elements
Governance
Strategy
Risks & opportunities

Comment
No Comment

**Publication**
In mainstream reports, incorporating the TCFD recommendations

**Status**
Complete

**Attach the document**

🔗 [2018 dwnd_Exelon_CSR.pdf](attachment:2018_dwnd_Exelon_CSR.pdf)

**Page/Section reference**
Exelon Corporate Sustainability Report: Pages 19-40; 42-60; 164-169

**Content elements**
- Governance
- Strategy
- Risks & opportunities
- Emissions figures
- Emission targets
- Other metrics

**Comment**
No Comment
C14. Signoff

C-FI

(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

No additional comments at this time.

C14.1

(C14.1) Provide details for the person that has signed off (approved) your CDP climate change response.

<table>
<thead>
<tr>
<th>Job title</th>
<th>Corresponding job category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Christopher D. Gould, Senior Vice President Corporate Strategy and Chief Sustainability Officer</td>
<td>Chief Sustainability Officer (CSO)</td>
</tr>
</tbody>
</table>

SC. Supply chain module

SC0.0

(SC0.0) If you would like to do so, please provide a separate introduction to this module.

Exelon as a Supplier: As a power producer, marketer and distributor, Exelon’s electricity and natural gas related services contribute to the GHG emissions profile of a wide variety of wholesale and retail consumers, including residential customers, businesses, manufacturers and government agencies. The actions we take to reduce GHG emissions within our electricity generation mix or distribution systems not only flow through to the benefit of our customers but also have a beneficial impact on the overall emission rates in the markets where we operate. These actions include investments in our delivery systems to help us better align with customer needs and to improve overall load management. Exelon utilities, ACE, BGE, ComEd, Delmarva, PECO and Pepco, invested $5.3 billion in technology and infrastructure in 2018, and are among the leaders in the nation in deploying smart meter and smart grid technologies.
Exelon Generation continues to focus on operating power generation assets at world class performance levels. In support of our customers’ interests in affordable, reliable and clean energy, we take pride in operating one of the most reliable power generation fleets in the country — a fleet with the lowest CO2 emission rate of, by an order of magnitude, the nation’s 20 largest investor-owned power generators. Our nuclear, wind, solar, hydroelectric and battery storage plants represent about 22,500 MW of zero-emission electricity. Exelon Generation is the largest generator of zero-carbon power in the United States due to our generation technology investments and our methodical approach to operational excellence and investment in increased capacity at existing zero-carbon plants.

Within our competitive retail offerings and utility services, we also provide customers with energy efficiency solutions to reduce their GHG emissions by more effectively managing the energy they use over time, and load response solutions to help them reduce consumption in response to energy price signals in the market. Additionally, through our utility-wide energy efficiency programs we are educating thousands of residential and business customers on the importance of energy efficiency and we directly help our customers make changes that will result in the reduction of the Scope 2 emissions associated with their electricity use.

We are also using our unique perspective, from having interests across the electricity value chain, to support the integration of clean energies through competitive markets that preserve reliability of supply and affordability for customers. Through Renewable Energy Credits (RECs) and Emission Free Energy Certificate (EFEC) products (associated with emissions free nuclear generation), Exelon helps our customers engage in carbon reduction activities, supports the development of low-carbon generation, and advocates for addressing the issue of climate change. In addition, through our compliance with Renewable Portfolio Standards (RPS) within the states where we do business, we are contributing to renewable generation development and a cleaner energy future.

Exelon as a Consumer: Exelon was also a founding member of the Electric Utilities Industry Sustainable Supply Chain Alliance, as we recognized the impact and influence that we could have with the suppliers we use and through the product choices that we make. The Alliance currently has 15 members and benefits from working together to green the electric utility industry supply chain. The Alliance is a 501(c) 6 Standards Development Organization with the mission to work with its members and interested stakeholders to develop voluntary consensus standards for the creation of a supply chain that is environmentally responsible, efficient, cost effective and positively impacts communities. Exelon has continued to be an active member in the Alliance as we have helped develop a sustainability framework that identifies best practices for embedding sustainability into an organization’s supply chain operations, products and services, and supplier performance. Exelon continues to pursue progress against the Alliance’s sustainability maturity model by creating more rigor around the scoring of sustainability aspects of supplier proposals in bids and by recognizing top suppliers with awards related to their environmental performance. In 2018, Exelon was represented on the Alliance’s executive committee, serving in the role of Vice Chair and in 2019, Exelon’s Chief Supply Offer became Chair of the executive committee.
SC0.1

(SC0.1) What is your company’s annual revenue for the stated reporting period?

<table>
<thead>
<tr>
<th></th>
<th>Annual Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1</td>
<td>35,985,000,000</td>
</tr>
</tbody>
</table>

SC0.2

(SC0.2) Do you have an ISIN for your company that you would be willing to share with CDP?

Yes

SC0.2a

(SC0.2a) Please use the table below to share your ISIN.

<table>
<thead>
<tr>
<th>ISIN country code (2 letters)</th>
<th>ISIN numeric identifier and single check digit (10 numbers overall)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1 US</td>
<td>US30161N10</td>
</tr>
</tbody>
</table>

SC1.1

(SC1.1) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.

Requesting member
AT&T Inc.

Scope of emissions
Scope 1
Allocation level
  Business unit (subsidiary company)

Allocation level detail
  Emissions rate will differ based on which of Exelon's operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
  For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

Verified
  Yes

Allocation method
  Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
  For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at http://www.exeloncorp.com/sustainability/Documents/dwnld_Exelon_CSR%20(1).pdf
  Retail customers are recommended to use these factors for their Market-based accounting. The grid average rates are also provided as
needed for location-based accounting. For those purchasing retail electric supply through one of our utilities, it is recommended that they use the PJM ISO residual emissions rate of 985.82 lbs/MWh.

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**Requesting member**
AT&T Inc.

**Scope of emissions**
Scope 2

**Allocation level**
Business unit (subsidiary company)

**Allocation level detail**
Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchased their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D losses per MWh delivered from each of our utilities is the most efficient way to respond to this question. Emissions related to T&D line losses are part of our third party verified Scope 2 inventory.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**
For electric customers: Emissions from Transmission & Distribution (T&D) line losses

**Verified**
Yes

**Allocation method**
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electricity commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh; Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh. For retail customers who purchase electricity from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.

Requesting member
AT&T Inc.

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)
Major sources of emissions
For natural gas customers: Fugitive emissions from the natural gas distribution system

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities: BGE - 0.225 kg CO2e/therm delivered; Delmarva Power - 0.124 kg CO2e/therm delivered PECO - 0.143 kg CO2e/therm delivered. For customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon’s distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.

Requesting member
Bank of America

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions rate will differ based on which of Exelon’s operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission
factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**
For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

**Verified**
Yes

**Allocation method**
Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**
For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at http://www.exeloncorp.com/sustainability/Documents/dwnld_Exelon_CSR%20(1).pdf
Retail customers are recommended to use these factors for their Market-based accounting. The grid average rates are also provided as needed for location-based accounting. For those purchasing retail electric supply through one of our utilities, it is recommended that they use the PJM ISO residual emissions rate of 985.82 lbs/MWh.

**Requesting member**
Eaton Corporation
**Scope of emissions**  
Scope 1

**Allocation level**  
Business unit (subsidiary company)

**Allocation level detail**  
Emissions rate will differ based on which of Exelon's operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**  
For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

**Verified**  
Yes

**Allocation method**  
Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**  
For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at
Retail customers are recommended to use these factors for their Market-based accounting. The grid average rates are also provided as needed for location-based accounting. For those purchasing retail electric supply through one of our utilities, it is recommended that they use the PJM ISO residual emissions rate of 985.82 lbs/MWh.

**Requesting member**
General Motors Company

**Scope of emissions**
Scope 1

**Allocation level**
Business unit (subsidiary company)

**Allocation level detail**
Emissions rate will differ based on which of Exelon's operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**
For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

**Verified**
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at http://www.exeloncorp.com/sustainability/Documents/dwnld_Exelon_CSR%20(1).pdf
Retail customers are recommended to use these factors for their Market-based accounting. The grid average rates are also provided as needed for location-based accounting. For those purchasing retail electric supply through one of our utilities, it is recommended that they use the PJM ISO residual emissions rate of 985.82 lbs/MWh.

Requesting member
Hewlett Packard Enterprise Company

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions rate will differ based on which of Exelon's operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

Emissions in metric tonnes of CO2e
Uncertainty (±%)

Major sources of emissions
For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at http://www.exeloncorp.com/sustainability/Documents/dwnld_Exelon_CSR%20(1).pdf
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Requesting member
HP Inc

Scope of emissions
Scope 1
Allocation level
   Business unit (subsidiary company)

Allocation level detail
   Emissions rate will differ based on which of Exelon's operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
   For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

Verified
   Yes

Allocation method
   Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
   For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at http://www.exeloncorp.com/sustainability/Documents/dwnld_Exelon_CSR%20(1).pdf
   Retail customers are recommended to use these factors for their Market-based accounting. The grid average rates are also provided as
needed for location-based accounting. For those purchasing retail electric supply through one of our utilities, it is recommended that they use the PJM ISO residual emissions rate of 985.82 lbs/MWh.

Requesting member
L'Oréal

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions rate will differ based on which of Exelon's operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

Verified
Yes
Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at http://www.exeloncorp.com/sustainability/Documents/dwnld_Exelon_CSR%20(1).pdf
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Requesting member
NRG Energy Inc

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions rate will differ based on which of Exelon's operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

Emissions in metric tonnes of CO2e
Uncertainty (±%)  

Major sources of emissions  
For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

**Verified**  
Yes

Allocation method  
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made  
For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at http://www.exeloncorp.com/sustainability/Documents/dwnld_Exelon_CSR%20(1).pdf  
Retail customers are recommended to use these factors for their Market-based accounting. The grid average rates are also provided as needed for location-based accounting. For those purchasing retail electric supply through one of our utilities, it is recommended that they use the PJM ISO residual emissions rate of 985.82 lbs/MWh.

Requesting member  
Bank of America

Scope of emissions  
Scope 2

Allocation level  
Business unit (subsidiary company)
Allocation level detail
Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchased their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D losses per MWh delivered from each of our utilities is the most efficient way to respond to this question. Emissions related to T&D line losses are part of our third party verified Scope 2 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
For electric customers: Emissions from Transmission & Distribution (T&D) line losses

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electricity commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh For retail customers who purchase electricity from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.
Requesting member
Eaton Corporation

Scope of emissions
Scope 2

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchased their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D losses per MWh delivered from each of our utilities is the most efficient way to respond to this question. Emissions related to T&D line losses are part of our third party verified Scope 2 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%) 

Major sources of emissions
For electric customers: Emissions from Transmission & Distribution (T&D) line losses

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electricity commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh For retail customers who purchase electricity from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.

Requesting member  
General Motors Company

Scope of emissions  
Scope 2

Allocation level  
Business unit (subsidiary company)

Allocation level detail  
Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchased their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D losses per MWh delivered from each of our utilities is the most efficient way to respond to this question. Emissions related to T&D line losses are part of our third party verified Scope 2 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions  
For electric customers: Emissions from Transmission & Distribution (T&D) line losses
Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electricity commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh For retail customers who purchase electricity from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.

Requesting member
Hewlett Packard Enterprise Company

Scope of emissions
Scope 2

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchased their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D losses per MWh delivered from each of our utilities is the most efficient way to respond to this question. Emissions related to T&D line losses are part of our third party verified Scope 2 inventory.
Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
For electric customers: Emissions from Transmission & Distribution (T&D) line losses

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electricity commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh For retail customers who purchase electricity from our company Constellation, but who are outside the territories of one of Exelon’s distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.

Requesting member
HP Inc

Scope of emissions
Scope 2
Allocation level
   Business unit (subsidiary company)

Allocation level detail
   Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchased their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D losses per MWh delivered from each of our utilities is the most efficient way to respond to this question. Emissions related to T&D line losses are part of our third party verified Scope 2 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
   For electric customers: Emissions from Transmission & Distribution (T&D) line losses

Verified
   Yes

Allocation method
   Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
   T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electricity commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh For retail customers who purchase electricity from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.
Requesting member
L’Oréal

Scope of emissions
Scope 2

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchased their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D losses per MWh delivered from each of our utilities is the most efficient way to respond to this question. Emissions related to T&D line losses are part of our third party verified Scope 2 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
For electric customers: Emissions from Transmission & Distribution (T&D) line losses

Verified
Yes

Allocation method
Allocation based on the volume of products purchased
Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electricity commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh; Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh. For retail customers who purchase electricity from our company Constellation, but who are outside the territories of one of Exelon’s distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.

Requesting member
NRG Energy Inc

Scope of emissions
Scope 2

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchased their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D losses per MWh delivered from each of our utilities is the most efficient way to respond to this question. Emissions related to T&D line losses are part of our third party verified Scope 2 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)
Major sources of emissions
For electric customers: Emissions from Transmission & Distribution (T&D) line losses

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electricity commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh For retail customers who purchase electricity from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.

Requesting member
Bank of America

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**
- For natural gas customers: Fugitive emissions from the natural gas distribution system

**Verified**
- Yes

**Allocation method**
- Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**
- Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities: BGE - 0.225 kg CO2e/therm delivered; Delmarva Power - 0.124 kg CO2e/therm delivered PECO - 0.143 kg CO2e/therm delivered. For customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.

**Requesting member**
- Eaton Corporation
Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
For natural gas customers: Fugitive emissions from the natural gas distribution system

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities: BGE - 0.225 kg CO2e/therm delivered; Delmarva Power - 0.124 kg CO2e/therm delivered PECO - 0.143 kg CO2e/therm delivered. For
customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.

Requesting member
General Motors Company

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
For natural gas customers: Fugitive emissions from the natural gas distribution system

Verified
Yes

Allocation method
Allocation based on the volume of products purchased
Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities: BGE - 0.225 kg CO2e/therm delivered; Delmarva Power - 0.124 kg CO2e/therm delivered PECO - 0.143 kg CO2e/therm delivered. For customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.

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**Requesting member**
Hewlett Packard Enterprise Company

**Scope of emissions**
Scope 1

**Allocation level**
Business unit (subsidiary company)

**Allocation level detail**
Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**
For natural gas customers: Fugitive emissions from the natural gas distribution system

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities: BGE - 0.225 kg CO2e/therm delivered; Delmarva Power - 0.124 kg CO2e/therm delivered PECO - 0.143 kg CO2e/therm delivered. For customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.

Requesting member
HP Inc

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.
**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**
For natural gas customers: Fugitive emissions from the natural gas distribution system

**Verified**
Yes

**Allocation method**
Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**
Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities: BGE - 0.225 kg CO2e/therm delivered; Delmarva Power - 0.124 kg CO2e/therm delivered PECO - 0.143 kg CO2e/therm delivered. For customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.

**Requesting member**
L'Oréal

**Scope of emissions**
Scope 1
**Allocation level**
- Business unit (subsidiary company)

**Allocation level detail**
Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**
For natural gas customers: Fugitive emissions from the natural gas distribution system

**Verified**
Yes

**Allocation method**
Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**
Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities:
- BGE - 0.225 kg CO2e/therm delivered;
- Delmarva Power - 0.124 kg CO2e/therm delivered;
- PECO - 0.143 kg CO2e/therm delivered.

For customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon’s distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.
**Requesting member**  
NRG Energy Inc

**Scope of emissions**  
Scope 1

**Allocation level**  
Business unit (subsidiary company)

**Allocation level detail**  
Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**  
For natural gas customers: Fugitive emissions from the natural gas distribution system

**Verified**  
Yes

**Allocation method**  
Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**
Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities: BGE - 0.225 kg CO2e/therm delivered; Delmarva Power - 0.124 kg CO2e/therm delivered PECO - 0.143 kg CO2e/therm delivered. For customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.

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**Requesting member**

U.S. General Services Administration - OMB ICR #3090-0319

**Scope of emissions**

Scope 1

**Allocation level**

Business unit (subsidiary company)

**Allocation level detail**

Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**

For natural gas customers: Fugitive emissions from the natural gas distribution system

**Verified**
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities: BGE - 0.225 kg CO2e/therm delivered; Delmarva Power - 0.124 kg CO2e/therm delivered PECO - 0.143 kg CO2e/therm delivered. For customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.

Requesting member
U.S. General Services Administration - OMB ICR #3090-0319

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions rate will differ based on which of Exelon's operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

Emissions in metric tonnes of CO2e
Uncertainty (±%)

Major sources of emissions
For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific emission factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at: https://www.exeloncorp.com/sustainability/Documents/dwnld_Exelon_CSR%20(1).pdf
Retail customers are recommended to use these factors for the Market-based accounting. The grid average rates are also provided as needed for location-based accounting. For those purchasing retail electric supply through one of our utilities, it is recommended that they use the PJM ISO residual emission rate of 985.82 lbs/MWh.

Requesting member
U.S. General Services Administration - OMB ICR #3090-0319

Scope of emissions
Scope 2
Allocation level
   Business unit (subsidiary company)

Allocation level detail
   Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchase their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D line losses per MWh delivered from each of our utilities is the more efficient way to respond to this question. Emission related to T&D line losses are part of our third party verified Scope 2 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
   For electric customers: Emissions associated with Transmission & Distribution line losses

Verified
   Yes

Allocation method
   Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
   T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electric commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh; Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh. For retail customers who purchase from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.
Requesting member
Grupo Bimbo, S.A.B. de C.V.

Scope of emissions
Scope 2

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchase their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D line losses per MWh delivered from each of our utilities is the more efficient way to respond to this question. Emission related to T&D line losses are part of our third party verified Scope 2 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
For electric customers: Emissions associated with Transmission & Distribution line losses

Verified
Yes

Allocation method
Allocation based on the volume of products purchased
Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electric commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh; Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh. For retail customers who purchase from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.

Requesting member
Stanley Black & Decker, Inc.

Scope of emissions
Scope 2

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers located within one of our utility service territories, and would apply regardless of which electric retailer they use to purchase their electric commodity. Since some companies have locations in several of our utility areas, providing emission factors for T&D line losses per MWh delivered from each of our utilities is the more efficient way to respond to this question. Emission related to T&D line losses are part of our third party verified Scope 2 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)
Major sources of emissions
For electric customers: Emissions associated with Transmission & Distribution line losses

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
T&D emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of electricity. This impact would be relevant even if the customer were purchasing the electric commodity from another retailer, and only delivery was through one of our utilities. The per KWh emissions rate for T&D line losses is as shown below for each of the Exelon utilities: ACE - 0.022 kg/kwh; BGE - 0.025 kg/kwh; ComEd - 0.023 kg/kwh; Delmarva Power - 0.018 kg/kwh; Pepco - 0.011 kg/kwh; PECO - 0.022 kg/kwh. For retail customers who purchase from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant T&D loss emissions.

Requesting member
Grupo Bimbo, S.A.B. de C.V.

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions rate will differ based on which of Exelon's operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission
factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

Emissions in metric tonnes of CO2e

Uncertainty (±%)

Major sources of emissions
For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific emission factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at: https://www.exeloncorp.com/sustainability/Documents/dwnld_Exelon_CSR%20(1).pdf
Retail customers are recommended to use these factors for the Market-based accounting. The grid average rates are also provided as needed for location-based accounting. For those purchasing retail electric supply through one of our utilities, it is recommended that they use the PJM ISO residual emission rate of 985.82 lbs/MWh.

Requesting member
Stanley Black & Decker, Inc.
**Scope of emissions**

Scope 1

**Allocation level**

Business unit (subsidiary company)

**Allocation level detail**

Emissions rate will differ based on which of Exelon's operating companies the customer purchases electricity from. In some cases, companies will purchase from several of our operating companies based on where their various operations are located. That is why providing emission factors for electricity as delivered from each of our operating companies is the most efficient way to respond to this question. Supplier specific emission factors are third party verified.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**

For electric customers: Emissions from generation (Exelon Scope 1 emissions from owned generation assets and Scope 3 from power we purchase for resale)

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

For those purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific emission factors for each state which is available on page 169 of our Corporate Sustainability Report available on our website at:
Retail customers are recommended to use these factors for the Market-based accounting. The grid average rates are also provided as needed for location-based accounting. For those purchasing retail electric supply through one of our utilities, it is recommended that they use the PJM ISO residual emission rate of 985.82 lbs/MWh.

**Requesting member**
Grupo Bimbo, S.A.B. de C.V.

**Scope of emissions**
Scope 1

**Allocation level**
Business unit (subsidiary company)

**Allocation level detail**
Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.

**Emissions in metric tonnes of CO2e**

**Uncertainty (±%)**

**Major sources of emissions**
For natural gas customers: Fugitive emissions from the natural gas distribution system

**Verified**
Yes
Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities: BGE - 0.225 kg CO2e/therm delivered; Delmarva Power - 0.124 kg CO2e/therm delivered PECO - 0.143 kg CO2e/therm delivered. For customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.

Requesting member
Stanley Black & Decker, Inc.

Scope of emissions
Scope 1

Allocation level
Business unit (subsidiary company)

Allocation level detail
Emissions only apply to customers purchasing natural gas within one of our utility service territories. Since some companies have locations in several of our utility areas, providing emission factors for emissions per therm delivered from each of our utilities is the most efficient way to respond to this question. Emissions from our natural gas distribution system are part of our third party verified Scope 1 inventory.

Emissions in metric tonnes of CO2e

Uncertainty (±%)
Major sources of emissions
For natural gas customers: Fugitive emissions from the natural gas distribution system

Verified
Yes

Allocation method
Allocation based on the volume of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
Fugitive methane emissions allocation is appropriate for retail customers located within one of our utility service territories for which our utility systems provide distribution of natural gas. This impact would be relevant even if the customer were retailing the natural gas commodity from another retailer. The per therm emissions rate for natural gas distribution would be as shown below for each of the applicable Exelon utilities: BGE - 0.225 kg CO2e/therm delivered; Delmarva Power - 0.124 kg CO2e/therm delivered PECO - 0.143 kg CO2e/therm delivered. For customers who purchase retail natural gas from our company Constellation, but who are outside the territories of one of Exelon's distribution utilities should contact the delivery utility for their area for relevant fugitive emissions from natural gas delivery.

SC1.2

(SC1.2) Where published information has been used in completing SC1.1, please provide a reference(s).
Exelon is an energy holding company that operates an electric generation business (Exelon Generation), an electric and natural gas commodities business (Constellation), as well as six distribution utilities including: ACE in Atlantic City, BGE in Baltimore, ComEd in Chicago, Delmarva Power in Delaware and Maryland, PECO in Philadelphia, and Pepco in Washington DC. Allocation of our GHG emissions is different depending upon which company the customer is purchasing from - and what commodity or service they are purchasing.

Exelon annually publishes a Corporate Sustainability Report to help customers and other stakeholders better understand Exelon's approach to the issues of sustainability - and includes a section on GHG emissions and verification, mitigation efforts and climate change adaptation and resiliency efforts. The most current report can be located at: https://www.exeloncorp.com/sustainability/Documents/dwnld_Exelon_CSR%20(1).pdf. For those
purchasing retail electric from Constellation, we have prepared and third-party verified supplier specific factors for each state which is available on page 169 of that report. For those purchasing natural gas, additional information on natural gas pipe replacement program and associated GHG emissions from our natural gas systems can be found in the CSR on page 60.

Retail customers are recommended to use these factors for their Market-based accounting. The grid average rates are also provided as needed for location-based accounting. For those purchasing retail electric supply through one of our utilities, it is recommended that they use the PJM ISO residual emissions rate of 985.82 lbs/MWh. PJM annual average and residual emissions rates can be found at: https://www.pjm-eis.com/reports-and-events/public-reports.aspx

**SC1.3**

(SC1.3) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

<table>
<thead>
<tr>
<th>Allocation challenges</th>
<th>Please explain what would help you overcome these challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other, please specify Complete Attribute Tracking for Electric</td>
<td>Complete attribute tracking is not available for the electric sector, especially when power may be traded several times and/or imported or exported from various ISO grid regions. Currently eGRID or ISO factors are considered to be most representative for location-based reporting under WRI Scope 2 protocol, and Constellation is still developing an appropriate means of reporting contractual &quot;as delivered&quot; rates that reflect Exelon's clean generation fleet.</td>
</tr>
<tr>
<td>Customer base is too large and diverse to accurately track emissions to the customer level</td>
<td>From the CDP requests as received it is difficult to determine which operating company and what type of purchases were associated with the requesting company. In addition, depending on the customer and/or type of product, total purchased volumes were not always possible to obtain in order to perform the allocation, as account numbers tend to be by location and our system does not always allow for pulling this information by a corporate entity name. It would be helpful to have requestors provide some additional information on the products for which they are interested in having emissions allocated.</td>
</tr>
</tbody>
</table>

**SC1.4**

(SC1.4) Do you plan to develop your capabilities to allocate emissions to your customers in the future?
Yes

**SC1.4a**

*(SC1.4a) Describe how you plan to develop your capabilities.*

Exelon has been working with the World Resource Institute (WRI) and The Climate Registry (TCR) to work through how best to report Supplier Specific emission rates for electric supplied at the retail level with the objective of issuing third party verified Supplier Specific rates that support the WRI Scope 2 accounting revisions issued January 2015. Exelon third-party verified its first set of Supplier Specific Emissions rates by state served in March 2017, have continued to publish this customer resource annually. We continue to work with peers and industry groups to develop consistency in this accounting between suppliers.

**SC2.1**

*(SC2.1) Please propose any mutually beneficial climate-related projects you could collaborate on with specific CDP Supply Chain members.*

---

**Requesting member**  
AT&T Inc.

**Group type of project**  
New product or service

**Type of project**  
Other, please specify  
App for Employee and Customer engagement on reducing your personal carbon footprint

**Emissions targeted**  
Actions that would reduce both our own and our customers' emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
to be determined

Details of proposal

Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The App promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the App and provide feedback on how the App could be used to service their sustainability purposes. For more information, please see http://www.ecocred.io/

Requesting member
Bank of America

Group type of project
New product or service

Type of project
Other, please specify
App for Employee and Customer engagement on reducing your personal carbon footprint

Emissions targeted
Actions that would reduce both our own and our customers’ emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
to be determined

Details of proposal

Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The App promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the App and provide feedback on how the App could be used to service their sustainability purposes. For more information, please see http://www.ecocred.io/

Requesting member
Eaton Corporation

Group type of project
New product or service

Type of project
Other, please specify
App for Employee and Customer engagement on reducing your personal carbon footprint

Emissions targeted
Actions that would reduce both our own and our customers' emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
Variations depending on the person and level of engagement

Details of proposal

Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The app promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the app and provide feedback on how the app could be used to service their sustainability purposes. For more information, please see http://www.ecocred.io/

Requesting member
General Motors Company

Group type of project
New product or service

Type of project
Other, please specify
App for Employee and Customer engagement on reducing your personal carbon footprint

Emissions targeted
Actions that would reduce both our own and our customers’ emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
Varies depending on the person and level of engagement

Details of proposal
Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The App promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the App and provide feedback on how the App could be used to service their sustainability purposes. For more information, please see http://www.ecocred.io/

Requesting member
Hewlett Packard Enterprise Company

Group type of project
New product or service

Type of project
Other, please specify
App for Employee and Customer engagement on reducing your personal carbon footprint

Emissions targeted
Actions that would reduce both our own and our customers’ emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
Variates depending on the person and level of engagement

Details of proposal
Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The App promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the App and provide feedback on how the App could be used to service their sustainability purposes. For more information, please see [http://www.ecocred.io/](http://www.ecocred.io/)

Requesting member
HP Inc

Group type of project
New product or service

Type of project
Other, please specify
App for Employee and Customer engagement on reducing your personal carbon footprint

Emissions targeted
Actions that would reduce both our own and our customers’ emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
Varies depending on the person and level of engagement

Details of proposal
Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The App promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the App and provide feedback on how the App could be used to service their sustainability purposes. For more information, please see http://www.ecocred.io/

Requesting member
L’Oréal

Group type of project
New product or service

Type of project
Other, please specify
App for Employee and Customer engagement on reducing your personal carbon footprint

Emissions targeted
Actions that would reduce both our own and our customers’ emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
Varies depending on the person and level of engagement

Details of proposal

Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The App promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the App and provide feedback on how the App could be used to service their sustainability purposes. For more information, please see http://www.ecocred.io/

Requesting member
NRG Energy Inc

Group type of project
New product or service

Type of project
Other, please specify
App for Employee and Customer engagement on reducing your personal carbon footprint

Emissions targeted
Actions that would reduce both our own and our customers’ emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
Varies depending on the person and level of engagement

Details of proposal
Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The App promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the App and provide feedback on how the App could be used to service their sustainability purposes. For more information, please see http://www.ecocred.io/

Requesting member
U.S. General Services Administration - OMB ICR #3090-0319

Group type of project
New product or service

Type of project
Other, please specify
App for Employee and Customer engagement on reducing your personal carbon footprint

Emissions targeted
Actions that would reduce both our own and our customers’ emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
Varies depending on the person and level of engagement

Details of proposal
Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The App promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the App and provide feedback on how the App could be used to service their sustainability purposes. For more information, please see http://www.ecocred.io/

Requesting member
Grupo Bimbo, S.A.B. de C.V.

Group type of project
New product or service

Type of project
Other, please specify
App for Employee and Customer engagement on reducing your personal carbon footprint

Emissions targeted
Actions that would reduce both our own and our customers’ emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
Varies depending on the person and level of engagement

Details of proposal
Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The App promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the App and provide feedback on how the App could be used to service their sustainability purposes. For more information, please see http://www.ecocred.io/

Requesting member
Stanley Black & Decker, Inc.

Group type of project
New product or service

Type of project
Other, please specify
App for Employee and Customer engagement on reducing your personal carbon footprint

Emissions targeted
Actions that would reduce both our own and our customers’ emissions
Estimated timeframe for carbon reductions to be realized
0-1 year

Estimated lifetime CO2e savings

Estimated payback
Other, please specify
Varies depending on the person and level of engagement

Details of proposal

Exelon is working on the development of a phone app that can be used for customer or employee engagement around the topic of personal carbon footprint and climate change. The App promotes awareness of what drives a personal carbon footprint and how that can tie back to city or corporate goals, as well as how products or initiatives might help make progress towards those goals. We are currently seeking corporations to pilot the App and provide feedback on how the App could be used to service their sustainability purposes. For more information, please see http://www.ecocred.io/

SC2.2

(SC2.2) Have requests or initiatives by CDP Supply Chain members prompted your organization to take organizational-level emissions reduction initiatives?
Yes

SC2.2a

(SC2.2a) Specify the requesting member(s) that have driven organizational-level emissions reduction initiatives, and provide information on the initiatives.
Requesting member
AT&T Inc.

Initiative ID

Group type of project

Type of project

Description of the reduction initiative
Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.

Emissions reduction for the reporting year in metric tons of CO2e

Did you identify this opportunity as part of the CDP supply chain Action Exchange?
No

Would you be happy for CDP supply chain members to highlight this work in their external communication?
No

Requesting member
Bank of America

Initiative ID
Group type of project

Type of project

Description of the reduction initiative

Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.

Emissions reduction for the reporting year in metric tons of CO2e

Did you identify this opportunity as part of the CDP supply chain Action Exchange?

No

Would you be happy for CDP supply chain members to highlight this work in their external communication?

No

Requesting member

Eaton Corporation

Initiative ID

Group type of project

Type of project
Description of the reduction initiative
   Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.

Emissions reduction for the reporting year in metric tons of CO2e

Did you identify this opportunity as part of the CDP supply chain Action Exchange?
   No

Would you be happy for CDP supply chain members to highlight this work in their external communication?
   No

---

Requesting member
   General Motors Company

Initiative ID

Group type of project

Type of project

Description of the reduction initiative
   Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.

Emissions reduction for the reporting year in metric tons of CO2e
Did you identify this opportunity as part of the CDP supply chain Action Exchange?

No

Would you be happy for CDP supply chain members to highlight this work in their external communication?

No

Requesting member

e H Hewlett Packard Enterprise Company

Initiative ID

Group type of project

Type of project

Description of the reduction initiative

Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.

Emissions reduction for the reporting year in metric tons of CO2e

Did you identify this opportunity as part of the CDP supply chain Action Exchange?

No

Would you be happy for CDP supply chain members to highlight this work in their external communication?

No
Requesting member
HP Inc

Initiative ID

Group type of project

Type of project

Description of the reduction initiative
Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.

Emissions reduction for the reporting year in metric tons of CO2e

Did you identify this opportunity as part of the CDP supply chain Action Exchange?
No

Would you be happy for CDP supply chain members to highlight this work in their external communication?
No
Group type of project

Type of project

Description of the reduction initiative
Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.

Emissions reduction for the reporting year in metric tons of CO2e

Did you identify this opportunity as part of the CDP supply chain Action Exchange?
No

Would you be happy for CDP supply chain members to highlight this work in their external communication?
No

Requesting member
NRG Energy Inc

Initiative ID

Group type of project

Type of project
Description of the reduction initiative
Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.

Emissions reduction for the reporting year in metric tons of CO2e

Did you identify this opportunity as part of the CDP supply chain Action Exchange?
No

Would you be happy for CDP supply chain members to highlight this work in their external communication?
No

Requesting member
U.S. General Services Administration - OMB ICR #3090-0319

Initiative ID

Group type of project

Type of project

Description of the reduction initiative
Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.
Emissions reduction for the reporting year in metric tons of CO2e

Did you identify this opportunity as part of the CDP supply chain Action Exchange?  
No

Would you be happy for CDP supply chain members to highlight this work in their external communication?  
No

Requesting member
Stanley Black & Decker, Inc.

Initiative ID

Group type of project

Type of project

Description of the reduction initiative
Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.

Emissions reduction for the reporting year in metric tons of CO2e

Did you identify this opportunity as part of the CDP supply chain Action Exchange?  
No
Would you be happy for CDP supply chain members to highlight this work in their external communication?
No

Requesting member
Grupo Bimbo, S.A.B. de C.V.

Initiative ID

Group type of project

Type of project

Description of the reduction initiative
Attention by our customers on this topic helps to reinforce our business case for continued expansion of our low carbon generation fleet and other energy efficiency efforts.

Emissions reduction for the reporting year in metric tons of CO2e

Did you identify this opportunity as part of the CDP supply chain Action Exchange?
No

Would you be happy for CDP supply chain members to highlight this work in their external communication?
No

SC3.1

(SC3.1) Do you want to enroll in the 2019-2020 CDP Action Exchange initiative?
No

SC3.2

(SC3.2) Is your company a participating supplier in CDP’s 2018-2019 Action Exchange initiative?

No

SC4.1

(SC4.1) Are you providing product level data for your organization’s goods or services?

No, I am not providing data

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

<table>
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<tr>
<th>Public or Non-Public Submission</th>
<th>I am submitting to</th>
<th>Are you ready to submit the additional Supply Chain Questions?</th>
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</thead>
<tbody>
<tr>
<td>I am submitting my response</td>
<td>Public</td>
<td>Investors Customers</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Yes, submit Supply Chain Questions now</td>
</tr>
</tbody>
</table>

Please confirm below

I have read and accept the applicable Terms