



## Welcome to your CDP Climate Change Questionnaire 2022

### C0. Introduction

#### C0.1

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

Exelon Corporation is the nation's largest utility company by customer count, serving more than 10 million customers through six fully regulated T&D utilities — Atlantic City Electric Company (ACE), Baltimore Gas and Electric Company (BGE), Commonwealth Edison Company (ComEd), Delmarva Power & Light Company (DPL), PECO Energy Company (PECO) and Potomac Electric Power Company (Pepco). In addition to the electric T&D services provided by all our utilities, three of our utilities (PECO, BGE and DPL) also provide natural gas service. In 2021, 91 percent of utility revenues were derived from electric operations and 9 percent from natural gas operations. Exelon trades on the NASDAQ Global Market<sup>SM</sup> under the symbol EXC and is a Fortune 200 company. Post separation from Constellation Energy, Exelon does not own any electric power generation resources. Unless otherwise noted, this report presents information and data that reflects the footprint of the current day T&D utilities business of Exelon. . Reporting on the generation side of the business would be now associated with Constellation Energy.

On February 21, 2021, Exelon's Board of Directors approved a plan to separate Exelon's utilities and its competitive power generation and customer-facing energy businesses into two publicly traded companies with the resources necessary to best serve customers and sustain long-term investment and operational excellence. After receiving the necessary regulatory approvals, and approval from Exelon's Board of Directors, the separation was completed on February 1, 2022, with the utilities business retaining the Exelon name. The competitive power and customer-facing energy businesses company now trades as Constellation Energy (NASDAQ: CEG); more information is available on the Constellation website. Each independent company now has its own core business strategy and financial and strategic focus. Exelon's purpose endures as a clear articulation of what we stand for and is embraced by our workforce: Powering a cleaner and brighter future for our customers and communities. This statement underscores our



commitment to advancing a better, more sustainable energy future — as well as our commitment to continuously improving the lives of those we serve. Follow Exelon on Twitter @Exelon.

This disclosure contains certain written and oral forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995 that are subject to risks and uncertainties. Words such as “could,” “should,” “likely,” “may,” “expects,” “anticipates,” “will,” “targets,” “goals,” “projects,” “intends,” “plans,” “believes,” “seeks,” “estimates,” “predicts,” and variations on such words, and similar expressions that reflect our current views with respect to future events and operational, economic and financial performance, are intended to identify such forward-looking statements. The factors that could cause actual results to differ materially from the forward-looking statements made by Exelon Corporation, Commonwealth Edison Company, PECO Energy Company, Baltimore Gas and Electric Company, Pepco Holdings LLC, 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) the Registrants 2021 Annual Report on Form 10-K filed with the Securities and Exchange Commission (SEC) on February 25, 2022 Part I ITEM 1A. Risk Factors; (2) the Registrants’ Current Report on Form 8-K filed with the SEC on June 30, 2022 to recast Exelon’s consolidated financial statements and certain other financial information originally included in the 2021 Form 10-K in (a) Part II ITEM 7. Management’s Discussion and Analysis of Financial Condition and Results of Operations and (b) Part II ITEM 8. Financial Statements and Supplementary Data: Note 17, Commitments and Contingencies; (3) the Registrants’ First Quarter 2022 Quarterly Report on Form 10-Q in (a) Part II, ITEM 1A. Risk Factors, (b) Part I, ITEM 2. Management’s Discussion and Analysis of Financial Condition and Results of Operations and (c) Part I, ITEM 1. Financial Statements: Note 12, Commitments and Contingencies; and (4) other factors discussed in filings with the SEC by the Registrants. Readers are cautioned not to place undue reliance on these forward-looking statements, whether written or oral, which apply only as of the date of this report. 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 report. The inclusion of information in this report should not be construed as a characterization regarding the materiality or financial impact of that information. For a discussion of information that is material to the Registrants, please see our filings with the SEC, including our Annual Reports on Form 10-K and Quarterly Reports on Form 10-Q.

## C0.2

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

	Start date	End date	Indicate if you are providing emissions data for past reporting years
Reporting year	January 1, 2021	December 31, 2021	No



## C0.3

**(C0.3) Select the countries/areas in which you operate.**

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 chosen approach for consolidating your GHG 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**

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### **Electric utilities value chain**

Transmission

Distribution

### **Other divisions**

Gas storage, transmission and distribution

Smart grids / demand response

Battery storage

Micro grids



## C0.8

**(C0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?**

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, an ISIN code	US30161N1019

## 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.**

Position of individual(s)	Please explain
Board-level committee	For Exelon, climate change considerations are fundamental to our business strategy. The Exelon Board’s Corporate Governance Committee oversees the company’s strategy and performance for addressing sustainability and environmental issues, including climate change. Our executive management team is supported by our new corporate Sustainability Council, established in early 2022 as an advisory body to oversee Exelon’s integrated ESG program and disclosures, including Exelon’s management of climate change. We maintain a Climate Change Policy that establishes our corporate position, and over the past year have developed a new Path to Clean plan that outlines our GHG mitigation goals and how we will drive to achieve them. Our Senior Vice President and Chief Strategy and Sustainability Officer (CSO) is responsible for chairing the Sustainability Council and overseeing the establishment and maintenance of our climate change efforts in coordination with our broader business strategy. The CSO also periodically reports to the Board’s Corporate



Governance Committee, including last year when Exelon’s Path to Clean 50% by 2030 and Net Zero by 2050 goals were established. We report progress on our GHG mitigation goal to executives quarterly, and as additional metrics are developed, we will establish similar reporting for technology and policy advancements. Our GHG inventory is third-party verified annually under ISO 14064, and our GHG management program and process is reviewed annually as part of our ISO 14001 certified Environmental Management System (EMS).

## C1.1b

### (C1.1b) Provide further details on the board’s oversight of climate-related issues.

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Please explain
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	Delivering clean, affordable and reliable energy to our customers is the essence of our business. Therefore, issues related to climate change and the impacts that the changing climate will have on our customers and the business are relevant to and of interest to the Exelon Board. Many elements of our overall business strategy are associated with climate change issues such as modernizing our distribution systems to enable clean energy solutions and improved energy management for our customers. Emerging and innovative technologies, operational performance to ensure reliability, as well as advocacy in support of policies that advance a decarbonized, resilient and equitable energy future, are topics relevant to our overall business strategy and are regularly included in our Board discussions. Other climate related issues are also discussed as appropriate or at least annually as part of the Corporate Governance Committee agenda.



	Monitoring and overseeing progress against goals and targets for addressing climate-related issues	
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### C1.1d

**(C1.1d) Does your organization have at least one board member with competence on climate-related issues?**

	Board member(s) have competence on climate-related issues	Criteria used to assess competence of board member(s) on climate-related issues
Row 1	Yes	Several members of our Board bring a thorough understanding of the transmissions and distribution system and drivers of system disruption, as well as experience in risk management and long-term planning through the insurance industry. The Exelon Board of Directors also has a program for providing continuing education for all directors. This education is provided during portions of board and committee meetings and focuses on emerging issues and topics relevant to issues before the directors (such as various implications of climate change). Education may take the form of presentations from senior leadership or other subject matter experts within the Company, presentations from external advisors, or “white papers” which are deep dives into timely subjects or topics. Continuing education also involves individual directors’ attendance at director education seminars and occasionally invited to tour Exelon’s facilities, both at Exelon’s expense. The Enterprise Risk Management organization within Exelon regularly evaluates the most significant risks of the business and emerging risks and discusses those risks with the Audit and Risk Committee of the Exelon Board of Directors. [Exelon 2022 Proxy Statement page 36]

### C1.2

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

Name of the position(s) and/or committee(s)	Responsibility	Frequency of reporting to the board on climate-related issues



Chief Sustainability Officer (CSO)	Both assessing and managing climate-related risks and opportunities	Quarterly
Chief Operating Officer (COO)	Other, please specify Performance under Path to Clean GHG Reduction Goal	Annually

## 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 Chief Sustainability Officer (CSO) 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 CSO 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, including climate change, is incorporated in decision-making at the highest levels within the company. The CSIS department recognizes opportunities associated with addressing climate change 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 CSO presents business strategy materials at least annually to the Board of Directors and is supported on the implementation and refinement of these programs by the CSIS management team, the COO, as well as the senior management of our operating companies, ComEd, PECO, BGE, PHI and Business Services Company (BSC). Performance associated with goals and targets of Key Performance Indicators, which include climate change related metrics, are presented quarterly to the CEO and Executive Committee. Our CSIS department is responsible strategic analysis of long-term climate change risks and scenario analysis in coordination with other key areas of the company. Our CSIS department is also responsible for the administration of the corporate GHG emissions reduction goal and the aggregation of the GHG emissions of the corporation, which are monitored quarterly and verified annually, with long-term planning for the identification and execution of needed emissions reduction actions coordinated through our Utility Operations Organization. Physical 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 (as it relates to site level physical climate change impacts).



### C1.3

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

Provide incentives for the management of climate-related issues		Comment
Row 1	Yes	No Comment

### 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).**

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Corporate executive team	Monetary reward	Emissions reduction target Efficiency target	For 2021, the corporate executive team was rewarded for meeting key business and financial targets including production targets for zero carbon electric generation, which reduces emissions associated with the broader grid supply (capacity factor targets for nuclear generation and capture rates for utility scale wind and solar), investment in utility infrastructure for reliability and resiliency and driving sustainable value through clean energy advocacy and our GHG emissions reduction goal. Going forward, following the company separation, revised executive compensation is being considered to better reflect our new transmission and distribution utility business model and new GHG goal.
Business unit manager	Monetary reward	Emissions reduction target Efficiency target	Exelon has utilized a corporate scorecard that includes a specific goal for managing GHG emissions. For 2021, before the announcement of our current goal, each Operating Company (OpCo) had renewed its 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) and Scope 3 customer abatement elements (energy efficiency and renewable energy credits) as they applied to their unique business area.





			Performance towards these metrics was a consideration in manager personal performance evaluations, which determine annual financial incentive payments. Going forward, a similar process is being realigned to the new Exelon GHG emissions reduction goal (50% reduction by 2030 from 2015), and utility level annual milestones are set.
Environment/Sustainability manager	Monetary reward	Emissions reduction target	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), annual performance rating takes into account working towards those goals and compensation is linked to those results. In 2021, 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.
All employees	Non-monetary reward	Emissions reduction project Energy reduction project Efficiency project	Employees receive recognition through various contests and initiatives that help to communicate climate change issues and lifestyle changes that can result in a reduced carbon footprint for employees at home. Exelon recognizes outstanding employee projects that help sustain the environment while creating company value for the company or local communities through annual performance reviews. Exelon uses its Re-Invent site and Innovation Centers to encourage employees to come forward with ideas and help them blossom into projects and initiatives that can be implemented.

## C2. Risks and opportunities

### C2.1

**(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?**

Yes



## C2.1a

### (C2.1a) How does your organization define short-, medium- and long-term time horizons?

	From (years)	To (years)	Comment
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.

## C2.1b

### (C2.1b) How does your organization define substantive financial or strategic impact on your business?

Our definition of 'substantive financial impact' when identifying or assessing and disclosing climate-related risks is generally consistent with that used for other business risk in our regular SEC 10-K filing. These risks may be characterized in a different manner for the purposes of the CDP survey in an effort to respond to the survey's structure and specificity. For the purposes of our enterprise risk management (ERM) process, we view climate change as an external risk, and incorporate into our risk valuation process as a potential stress multiplier to existing risks and opportunities already under consideration. For example, system disruption from a weather event is a longstanding risk that Exelon has integrated into its risk assessment process, and potential climate change projections for more frequent storms would be a multiplier for this risk category but not necessarily broken out as an incremental impact nor added separately. Similarly, disruption from new technology is another risk category that is already being captured in our ERM process that could also be increased by climate change-related actions, but not necessarily fully attributable to climate change. We also recognize that climate change may affect different parts of our business in different ways, and thus it is our approach to integrate climate change considerations into our regular business policies, processes, and procedures.

## C2.2

### (C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.



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**Value chain stage(s) covered**

Direct operations  
Upstream  
Downstream

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

More than once a year

**Time horizon(s) covered**

Short-term  
Medium-term  
Long-term

**Description of process**

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.

Part 1 IDENTIFICATION:

Risk monitoring covers all geographic areas where we operate and occurs continuously throughout the year. Structural independence from the businesses is established through a centralized ERM organization within Exelon. The ERM Director reports directly to Exelon's EVP, Compliance, Audit, and Risk, who reports to the CEO and the chair of the Exelon Board's Audit and Risk Committee. Risk issues are regularly reviewed with Executives as well as Exelon's Board of Directors. Operationally, ERM interacts regularly with the business. Each operating company has a Risk Management Committee tasked with identifying and evaluating the most significant risks of the business and the actions needed to manage and mitigate those risks.

In addition, Exelon has adopted a "Three Lines" operating model to delineate responsibilities across the enterprise: First Line: Functions that own and manage risk; Second Line: Functions that monitor internal and external compliance and risk (Compliance and Enterprise Risk



Management); and Third Line: Functions that provide independent assurance (Internal Audit).

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.

**Part 2 ASSESSMENT:**

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).

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. For the purposes of our ERM process, we consider climate change as an external risk with the potential to affect the already captured risk of disruption to our distribution systems. For example, system disruption from a weather event is a long-standing risk that Exelon has integrated into its risk assessment process, and potential climate change projections for more frequent storms would not necessarily be broken out as an incremental impact being added separately. Disruption from new technology is another risk category that can be viewed similarly.

**Part 3 PROCESS FOR RESPONDING:**

**Mitigation/Transition:** Potential climate change impacts to our business model as identified in our ERM process are included in our corporate strategic plan. Exelon's business strategy is informed by our views of the key trends in our industry, encompassing these climate change/decarbonization transition risks. As a response to the key trends, our 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.

**Physical Climate:** 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. The identification of potential climate change risks is still primarily event driven, since longer-term climate projections carry a level of uncertainty that limits use in cost-benefit analyses. However, because all Exelon utilities share best practices, a disruptive event at one utility can drive performance improvement and proactive planning across all of Exelon utilities.

Exelon is also taking proactive efforts to explore the integration of future climate change projections into our already robust planning processes. We have worked to expand and improve our climate risk management efforts since we joined the DOE Partnership for Electric Sector Climate Resilience as a founding member in 2015 and now with a renewed focus through the Electric Power Resource Institute Climate Resilience program.

**CASE STUDIES on the process:**

**TRANSITIONAL OPPORTUNITY:**

- Situation: Exelon recognized the increased focus and ambition of our customers and communities to drive towards decarbonization, which



would put new pressures on our systems to meet these clean energy ambitions.

- Task: Exelon has researched and participated in a variety of stakeholder and industry studies around decarbonization and listened and participated with community program development and goal setting such that we could develop an informed position around how it could play a role in the transition to a clean energy future.

- Action: Electrification and grid decarbonization are key levers for economy-wide emissions reductions. Exelon sees supporting this growth and evolution of electric distribution and expansion of zero-carbon generation at a local level as an important business opportunity.

- Result: Currently Exelon plans to invest almost \$29 billion from 2022 through 2025 in grid modernization and resilience. This investment will result in added customer benefits and increased performance and reliability metrics would improve our ability to earn at or above our current rate of recovery.

**PHYSICAL RISK:**

- Situation: The Exelon utilities' distribution and transmission infrastructures could be impacted by more frequent and more extreme weather events, changes in temperature and precipitation patterns. Severe weather or other natural disasters are destructive and result in O&M and capital costs for recovery.

- Task: Exelon reviews its year over year changes in storm related costs. As referenced in the Results of Operations in our 10-K (pg 72 to 92), based on last year, estimated financial implications of storm recovery costs could swing by up to \$64 million per year for any of our 6 utilities. Not included in this estimate is the potential for increased costs associated with any related supply disruptions.

- Action: Exelon is investing in smart meter and smart grid initiatives to help speed storm recovery, as well as system upgrades and improved vegetation management to help improve system resiliency and part of its 5 year plan to invest almost \$29 billion from 2022 through 2025 in grid modernization and resilience.

-Result: Through implementation of the pro-active system hardening and resiliency efforts we can minimize the potential swing in storm recovery costs.

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**Value chain stage(s) covered**

Direct operations

Upstream

Downstream

**Risk management process**



A specific climate-related risk management process

**Frequency of assessment**

Every three years or more

**Time horizon(s) covered**

Medium-term

Long-term

**Description of process**

As part of our medium- and longer-term risk assessment efforts, Exelon and its affiliates have used various climate change scenarios and run our own exploratory long-term economy-wide modelling to help inform the long-term viability of, or challenges to, our assets and business model as a result of climate change. In our scenario analysis efforts, we have considered our own assets, as well as how our upstream power suppliers might be affected as a result of climate-related load, grid technology, regulation changes. We also consider how our downstream customers might use or seek to buy electricity differently as a result of climate-related changes to demand and/or desire to adopt distributed generation. For example, in relation to physical risks, we have looked at how projected temperature changes over time might affect heating loads in our service territories. An example related to transitional risks includes modelling how demand might change with the level of electrification that would be needed to meet deep decarbonization goals and looking at the potential speed of transition if tied to sales and stock turnover. The results of these scenario analyses are shared with our risk management and operating companies' teams to ensure they are aware of these projected physical changes and transitional possibilities.

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**Value chain stage(s) covered**

Direct operations

**Risk management process**

A specific climate-related risk management process

**Frequency of assessment**

Annually



**Time horizon(s) covered**

Short-term

**Description of process**

Exelon’s assets undergo seasonal readiness efforts to ensure they are ready for the weather projections of the summer and winter months. Project climate conditions and asset conditions are examined to identify risks. Pro-active maintenance opportunities are assessed, prioritized and implemented to avoid potential system disruptions and outages. An example of this would be the proactive tree trimming that is completed each year before storm season begins.

**C2.2a**

**(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?**

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	Regulations can carry a risk of limiting the 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 (PSCs). 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. 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’s current business model is referred to as a “distribution utility,” since Exelon Corporation now only owns regulated T&D utilities (ACE, BGE, DPL, ComEd, PECO and Pepco), after all of our competitive power generation was split off as a separate company in early 2022 (Constellation). Exelon is continuing to participate in efforts to transform policies and regulations so that utilities



		<p>may perform valuable functions and offer services that would benefit customers that were 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 (e.g. energy efficiency and demand response).</p>
Emerging regulation	Relevant, always included	<p>Exelon supports GHG emission reduction policies to combat climate change. Exelon's utilities each buy or deliver electricity based on the generation resources that are available on the PJM electric grid and in line with our state or jurisdictional targets and goals. While Exelon continues to work at multiple levels of government and in all our jurisdictions to advance a clean, affordable and reliable energy future, a comprehensive, meaningful national climate program remains necessary to drive decarbonization of the electric grid. At the federal level, the Biden Administration has announced goals to transform the U.S. economy to drive decarbonization, expand access to clean and affordable energy, modernize and harden the underlying energy system and supporting communications networks, and create new opportunities for under-resourced and under-represented communities. At the state level, the jurisdictions in which we operate continue to advance policies and programs to reduce GHG emissions, increase efficiency and electrification and build resilience. As recently as March 2022, the Maryland General Assembly passed legislation that would cut economy-wide GHG emissions by 60 percent from 2006 levels by 2031 and achieve net-zero by 2045 — one of the most ambitious state net-zero targets in the nation. We expect to continue to see a convergence of energy and climate policy in the years to come. The mechanisms used to drive decarbonization of the electric grid will determine both how successful the effort is and at what cost.</p>
Technology	Relevant, always included	<p>New and emerging technology creates a risk of disrupting existing systems and processes by approaching solutions in different ways. As a result, the T&amp;D system 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 monitor and manage energy usage, as well as to integrate local generation resources into the emerging smart grid more efficiently. 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. In order to stay on top of the potential impacts of these new technologies, Exelon has 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 collaborate with government and industry associations, national labs, top universities,</p>





		<p>venture capital and private equity firms. To date, the effort 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: 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 2021, Exelon also welcomed its second cohort of start-ups focus on climate change impact through our newest 2c2i climate change funding initiative in partnership with Exelon Foundation, which is yet another way we are working to foster new technologies and stay involved in emerging technologies.</p>
Legal	Relevant, always included	<p>New or emerging markets relating to renewable, clean energy, or carbon emissions reduction offsets pose risks to meeting our utilities' clean energy obligations under state regulations in a cost-effective 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, and that environmental claims associated with these products are credible. An example of Exelon's involvement in these emerging environmental attribute markets is our participation in 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 and is working to implement that methodology for the creation of offsets.</p>
Market	Relevant, always included	<p>In general, existing electricity markets focus on lowest commodity cost and assign no value to clean energy. In addition to clean energy, our customers demand an affordable and resilient power system that provides electricity under a wide range of weather and load scenarios which could be impacted by climate-related changes. Wholesale energy markets need to evolve to properly value reliable, clean and affordable energy. Wholesale competitive power markets, as currently designed, also do not adequately consider generating resources' ability to withstand fuel supply disruptions, whether from extreme winter weather or physical supply infrastructure risk. All of these issues relate to the cost of electricity which we pass on to our customers, and therefore our involvement in market evolution is critical to maintaining cost effective electricity.</p>



<p>Reputation</p>	<p>Relevant, always included</p>	<p>As a long-term proponent of clean energy policy, 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 U.S. Environmental Protection Agency (EPA) Climate Leaders program in 2008 resulting in a 36% reduction in our own emissions, and 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, with the separation of the low carbon generation fleet and transition to a delivery-only utility, Exelon needs to continue to highlight its commitment to decarbonization, as well as remain an active participant in this important effort. That is why in August 2021, Exelon utilities expanded and extended our greenhouse gas (GHG) emissions goal for our new company structure following the split with Constellation. Exelon set a goal to reduce its operations-driven emissions 50% by 2030 and achieve net-zero operations by 2050, while also supporting our customers and communities in achieving their clean energy goals. This is our “Path to Clean.” This goal encompasses our fleet vehicle transition goal to electrify 30% of our vehicle fleets at all six of our utilities by 2025, and most recently a commitment to set a supporting building energy efficiency target as part of the DOE Better Climate Challenge. By setting high ambitions for our own operations, we hope to inspire and pull forward best practices that can support our customers and communities in meeting their own decarbonization goals. We know that performing to this goal is important to our stakeholders and investors, which is why we are standing up a strong governance structure around the management of this goal to ensure it is achieved.</p>
<p>Acute physical</p>	<p>Relevant, always included</p>	<p>Acute physical risks are event-driven, and include extreme weather events, such as cyclones, hurricanes, or floods. Exelon’s operating companies each have and will continue to face acute physical risks associated with the extreme events typical to their geographic location as well as projected increases in their severity and frequency over time. For our east coast utilities, these acute physical risks include severe thunderstorms, tropical storms, and hurricanes, but in recent years have also included Derecho windstorms and tornados. For our Mid-West utility, acute physical risks include severe thunderstorms, tornados, and ice storms. All areas have begun to note more intense rainfall as well, which has caused inland flooding along streams and over roadways. Because of our focus on reliability, this risk is always relevant to Exelon, and many processes and programs are in place to help prepare for such events. All Exelon assets undergo seasonal readiness efforts to ensure that they are ready for the weather projections of the summer and winter months, and each utility is investing in its systems to install advanced equipment and reinforce the local electric system, making it more weather resistant and less vulnerable to storm damage. This includes inspecting and replacing poles and trimming</p>



		<p>vegetation and trees, as well as testing and drills to keep storm response skills sharp and ensure crews are ready to respond to severe storms or emergencies, if needed. And, as part of the Exelon family of companies, each utility can call on resources from sister utilities in Pennsylvania, Delaware, Maryland, New Jersey, Washington, D.C., and Illinois to restore power more quickly after major storms. For storm events that are forecast relatively accurately in advance of impact (such as hurricanes or some winter storms, for instance), Exelon may acquire extra resources or “pre-staging” crews in advance. For storms with little to no warning (summer thunderstorms and derechos, for example), resources are acquired as quickly as possible after impact and are sought from as close-by as possible, to minimize mobilization times. Exelon is also considering projections for potential changes to physical risk challenges associated with climate change and working to integrate these into our already robust planning and recovery progresses.</p>
<p>Chronic physical</p>	<p>Relevant, sometimes included</p>	<p>Chronic physical risks are longer-term shifts in climate patterns, such as sustained higher temperatures, changes to typical precipitation patterns and sea level rise, which may cause chronic issues for the communities in our service territories. Based on a review of the United States Fourth National Climate Assessment, all off our operations are projected to experience varying degrees of heat increases over the coming years, with a combined heat and humidity increases in the Mid-Atlantic and Mid-West where our service territories reside. Our Mid-Atlantic our coastal utilities face issues associated with potential sea level rise in some of the areas that they serve. In the Mid-West, both periods of drought (which challenge certain of our communities), as well as periods of excess rainfall with the potential to flood distribution system assets are shown as potential climate changes. While the extent of these threats is continuing to unfold, these potential risks are something that Exelon is beginning to consider within its infrastructure planning work. Examples of how climate change considerations are incorporated into this process include revision of current engineering and constructions standards and the revamp of the overall material condition assessment process within our utilities, with the intent to review all 13 major asset classes by 2026. Through this effort we are reviewing standards associated with our most critical asset classes to identify climate critical components and thresholds that will help inform our infrastructure planning over the long-term to better capture climate change risks.</p>

**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.**

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### Identifier

Risk 1

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

Direct operations

### Risk type & Primary climate-related risk driver

Current regulation

Mandates on and regulation of existing products and services

### Primary potential financial impact

Other, please specify

Decreased revenue due to inability to recover costs

Through our current business model as a regulated utility, our primary revenues are based on our ability to recover system investment costs through the rate making process with approval from the Public Utility Commission. As decarbonization efforts will require expansion and enhancement of existing distribution systems; inability to receive approval for needed investments could prevent or slow these needed system improvements.

### Company-specific description

Through our current business model as a regulated utility, our primary revenues are based on our ability to recover system investment costs through the rate making process with approval from the Public Utility Commission. As decarbonization efforts will require expansion and enhancement of existing distribution systems; inability to receive approval for needed investments could prevent or slow these needed system improvements.

Each of Exelon's utilities are required to engage in regulatory approval proceedings as a part of the process of establishing the terms and rates



for its respective services. These proceedings typically involve multiple parties, including governmental bodies and officials, consumer advocacy groups, and various consumers of energy, who have differing concerns; many of these parties have the objective of limiting rate increases or even reducing rates. Decisions are subject to appeal, potentially leading to additional uncertainty associated with the approval proceedings. The potential duration of such proceedings creates a risk that rates ultimately approved by the applicable regulatory body may not be sufficient for a utility to recover its costs by the time the rates become effective. Established rates are also subject to subsequent prudency reviews by state regulators, whereby various portions of rates could be adjusted, subject to refund or disallowed, including recovery mechanisms for costs associated with the procurement of electricity or gas, smart grid infrastructure, system expansion, hardening or enhancements and energy efficiency and demand response programs - all of which are needed to support decarbonization efforts. As significant system investment will potentially be required to support increased load from electrification, enablement of distributed resources, and overall grid management in support of decarbonization efforts, there is risk associated with on-going approvals of recovery of these costs through rate proceedings.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

Medium-high

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

Yes, an estimated range

**Potential financial impact figure (currency)**

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

3,000,000

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

114,000,000



**Explanation of financial impact figure**

This is a risk already identified in our 2021 Form 10-K financial disclosure, page 202, and the current gap between current rate filing requests and what was approved ranges from \$3 to \$114 million. This range is based on the completed distribution base rate case proceedings in 2021 and is reflective of the variance possible in future cases that may incorporate decarbonization investments.

**Cost of response to risk**

0

**Description of response and explanation of cost calculation**

Exelon has focused on optimizing investment plans over time to ensure prudent and necessary investments are prioritized. We are also informing our strategy and policy advocacy through a variety of decarbonization studies and involvement in research & development and early-stage pilots to ensure we understand cost effective decarbonization solutions and how best to work them into our future planning and investments to align with the needs and ambitions of our communities. Exelon maintains a Corporate Strategy and Sustainability group and State and Federal policy specialists as part of its regular business costs and do not require additional discrete costs for the consideration of climate-related issues which we view as foundational to our business and incremental for climate change.

Regulatory planning and certainty over multiple years provides opportunities for more efficient procurement, enables hiring and longer-term contracting with our local, diverse suppliers, and allows us to attract capital at lower cost. It also provides transparency to our customers about what future energy costs will be and opportunities for all stakeholders to understand the investments we intend to make before making them. This forward-looking approach to regulation can take many forms. For example, Pepco and BGE have multi-year plans in effect for their jurisdictions, while ComEd will transition to a form of forward-looking ratemaking as a result of the Clean Energy Jobs Act. DPL Maryland has also filed a multi-year plan in 2022. In Pennsylvania, PECO uses a fully projected future test year, while ACE and DPL have capital trackers that execute on an agreed-upon multi-year category of investments. This move toward multi-year rate mechanisms will enable greater levels of transparency, certainty and engagement for us and our customers alike. An example case study is in November 2021, PECO obtained approval from the Pennsylvania Public Utility Commission for its transportation electrification pilot programs to encourage the deployment of EV infrastructure for public transit and commercial customers. The pilot authorized more than \$1.5 million in funding for these programs and customer education efforts.

**Comment**

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**Identifier**

Risk 2

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

Direct operations

**Risk type & Primary climate-related risk driver**

Acute physical

Cyclone, hurricane, typhoon

**Primary potential financial impact**

Increased direct costs

**Company-specific description**

Exelon periodically performs analyses to better understand how climate change could affect our facilities and operations. Exelon primarily operates in the Midwest and Mid-Atlantic of the United States, areas that historically have been prone to various types of severe weather events, and as such we have well-developed response and recovery programs based on these historical events. However, Exelon's physical facilities could be placed at greater risk of damage should changes in the global climate impact temperature and weather patterns, and result in more intense, frequent and extreme weather events, unprecedented levels of precipitation, sea level rise, increased surface water temperatures, and/or other effects.

Examples of extreme storms that have impacted our utilities in recent years include Hurricanes Ida in August 2021 and Isaias in August 2020, each of which brought significant rainfall and winds to our east coast utilities.

**Time horizon**

Short-term

**Likelihood**

Very likely



**Magnitude of impact**

Medium-high

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

Yes, an estimated range

**Potential financial impact figure (currency)**

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

0

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

64,000,000

**Explanation of financial impact figure**

Storm recovery costs are planned for in each of our utility's annual operating budgets, but costs can vary at each utility year to year by millions of dollars to upwards of 100 million dollars, depending on the significance of storm events experienced by each utility. Variations on storm-related costs are reported by utility in our Form 10-K under Results of Operations (starting on page 72 for the 2021 Form 10-K). In the summer of 2021, Hurricane Ida brought significant rainfall and winds to our Mid-Atlantic utilities, while powerful thunderstorms affected ComEd in the Midwest. Restoration efforts included significant costs for employee overtime, support from other utilities, and contracted tree trimming crews, which result in incremental O&M expense and capital expenditures. However, despite these storms, nearly all of our utilities saw less storm costs in 2021 than they did in 2020. PECO experienced reduced storm costs by \$64 million as compared to 2020 (which was the highest swing in costs and used as the upper band in the financial impacts shown above), while ComEd's were \$6 million lower than they were 2020. BGE's and PEPCO's storm-related costs increased by \$7 million and \$5 million respectively as compared to 2020, DPL's and ACE's storm-related costs decreased in 2021 by \$20 million and \$9 million respectively as compared to 2020. The potential financial impact figure range that is shown is reflective of the variation in storm recovery costs increases as reported in the 2021 Form 10-K, although this variability may change depending on the types of storms in a given year and may not be entirely attributable to climate change.

**Cost of response to risk**

0





### **Description of response and explanation of cost calculation**

Maintaining energy system reliability is of paramount importance to Exelon and weather-related risk is always a key focus area for the company. We have many processes and programs in place to help prepare for the types of events that we have historically experienced, and we review and provide training on climate change projections. Each utility is investing in its systems to install new and advanced equipment and technology designed to support higher levels of reliability and resilience, including more than 10 million smart electric and gas meters and are using these technologies to avoid outages and speed recovery through early identification of outage location and specifics, as well as identifying equipment that is experiencing issues such that outages can be averted, all making our systems more weather-resistant and less vulnerable to the effects of extreme weather events that are expected with climate change. This includes inspecting and replacing poles and trimming vegetation and trees, as well as drills to keep storm response skills sharp and ready to respond to emergencies. In addition, each Exelon utility can call on resources from its sister utilities to restore power more quickly after major storms. 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. We also work with our local communities to develop cost effective and appropriate resilience efforts and have demonstration projects within each of our utility service territories, ranging from LED smart streetlight conversions to resiliency hubs and complete microgrids. Exelon maintains a Storm Response/Emergency Management organization as part of its regular business costs and do not require additional discrete costs for the consideration of climate-related issues which we view as foundational to our business. Exelon is also partnering with NOAA and others on further informing publicly available climate change projections. Exelon invested \$6.6 billion in 2021 in grid modernization and resilience. System hardening and improved grid management are difficult to fully define and are not discretely measured at this time. It is assumed that all infrastructure investments work together to improve resiliency while also providing other customer benefits, and system recovery functions are core to our business, therefore no discrete incremental cost can be associated with just climate change.

### **Comment**

---

#### **Identifier**

Risk 3

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

Direct operations



**Risk type & Primary climate-related risk driver**

Reputation

Increased stakeholder concern or negative stakeholder feedback

**Primary potential financial impact**

Decreased access to capital

**Company-specific description**

As a long-term proponent of clean energy policy, 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 United States Environmental Protection Agency (EPA) Climate Leaders program in 2008, resulting in a 36% reduction in our own emissions, and 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, with the separation from our low carbon generation fleet and transition to a delivery-only utility, Exelon must continue to emphasize its commitment to decarbonization and highlight its role as a steward of the energy transition. That is why, in August 2021, Exelon utilities made the bold step of expanding and extending our greenhouse gas (GHG) emissions goal for our new company structure following the separation of Constellation. Exelon set a goal to reduce its operations-driven emissions 50% by 2030 and achieve net-zero operations by 2050, while also supporting our customers and communities in achieving their clean energy goals. This is our “Path to Clean.” This goal encompasses our fleet vehicle transition goal to electrify 30% of our fleet vehicles at all six of our utilities to electric vehicles by 2025, and most recently a commitment to set a supporting building energy efficiency target as part of the DOE Better Climate Challenge. By setting high ambitions for our own operations, we hope to inspire best practices that can support our customers and communities in meeting their own decarbonization goals. We know that performing to this goal is important to our stakeholders and investors, which is why we are standing up a strong governance structure around the management of this goal to ensure it is achieved.

**Time horizon**

Short-term

**Likelihood**

About as likely as not

**Magnitude of impact**



Medium

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

Yes, an estimated range

**Potential financial impact figure (currency)**

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

0

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

309,000,000

**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 have financial metrics, such as: stock price, cost of capital, relationships with regulatory authorities, customer satisfaction, and 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. Exelon's adjusted market value based on its new configuration as of June 30, 2021, was 30.9 billion dollars, if up to 1% of that annual market value were to be impacted by climate change-related reputation, the potential financial impact could range from 0 to 309 million dollars. This is the estimated value range is shown as the potential financial impact for perspective of scope and scale only.

**Cost of response to risk**

24,000,000

**Description of response and explanation of cost calculation**

In August 2021, the Utility Registrants announced a "Path to Clean" goal to collectively reduce their operations-driven emissions 50% by 2030 against a 2015 baseline, and to reach net zero operations-driven emissions by 2050, while also supporting customers and communities to achieve their clean energy and emissions goals. This goal builds upon Exelon's long-standing commitment to reducing our GHG emissions.



Exelon's "path to clean" will include efficiency and clean electricity for operations, vehicle fleet electrification, equipment and processes to reduce sulfur hexafluoride (SF6) leakage, modern natural gas infrastructure to minimize methane leaks and increase safety and reliability, and investment and collaboration to develop new technologies.

Over the next 10 years, Exelon anticipates investing approximately \$4.8 billion in infrastructure investments that will contribute towards its "Path to Clean" goal; with much of that investment to maintain the safety and reliability of our natural gas systems by systematically replacing older gas system pipes and service connections; this investment also supports Exelon's Path to Clean plan by reducing low-level fugitive methane releases that may exist across older portions of our gas distribution system. Due to the global warming potential of methane, reduction of these fugitive emissions is playing a significant role in reducing Exelon's operations-driven GHG emissions under our Path to Clean program. The value shown is a single year of this investment annualized over 20 years. Exelon believes it has line of sight into solutions available today to achieve 80% of its "path to clean" goal and that achieving full net-zero operations will require further technology advancement and consistent policy support. Exelon is laying the groundwork for that by partnering with national labs, universities, and research consortia to research, develop and pilot clean technologies. See also 10-K page 22.

### Comment

## 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?**

Downstream

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Development and/or expansion of low emission goods and services

**Primary potential financial impact**

Increased revenues through access to new and emerging markets

**Company-specific description**

As U.S. states and companies make commitments to cleaner, renewable generation sources, the electrification of transportation and other end uses continues to grow as a key tool for decarbonization. Beneficial electrification is a subset of broader electrification opportunities that meet one or more of the following conditions without adversely affecting the other two: enabling better grid management; reducing negative environmental and health impacts; or saving customers money over the long run. Specifically, electrification of vehicles presents this opportunity now, and with cost-effective vehicles available, customers in Exelon's utilities service territories are beginning to convert. Exelon sees this as a growth opportunity, increasing use of its product and services to supply the needed electricity, as well as the charging infrastructure and helping manage overall affordability for all customers. New rate structures will be required to meet these emerging needs.

PECO is a leading advocate of legislation to authorize utilities to recover the costs of EV infrastructure incentives and support the deployment of charging infrastructure on essential public access corridors and in underserved communities. PECO supports legislation introduced in the Pennsylvania state senate (SB 435) that will further these aims. In addition, in November 2021, PECO obtained approval from the Pennsylvania Public Utility Commission for its transportation electrification pilot programs to encourage the deployment of EV infrastructure for public transit and commercial customers. The pilot authorized more than \$1.5 million in funding for these programs and customer education efforts.

BGE and the PHI Maryland utilities have been executing some of the nation's earliest and most innovative EV infrastructure and incentive programs since their 2019 launch of EVsmart initiatives in the state. From building an expansive network of utility-owned and -operated public



EV chargers, to providing incentives to consumers and businesses to purchase and install smart EV chargers, to BGE's implementing a first-of-its-kind EV-Only Time-of-Use rate without having to set a second meter at customers' homes — the Exelon Maryland utilities have pushed Maryland to be in the top 10 of all states in rankings of EV readiness and friendliness. And, in New Jersey, Atlantic City Electric received approval from the New Jersey Board of Public Utilities to implement a make-ready and customer rebate program.

**Time horizon**

Medium-term

**Likelihood**

Very 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**

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 investments through utility ownership, incentives or rebates with cost recovery and return opportunities. Exact financial impact of support for vehicle electrification through customer programs and installation of public chargers is dependent on our ability to recover our increased investment and the development of policies around the utilities role in the management of these systems.



## **Cost to realize opportunity**

### **Strategy to realize opportunity and explanation of cost calculation**

Exelon has a number of internal groups to foster and manage the business activities to drive electric vehicle (EV) adoption in the regions we operate. Our operating companies and corporate support functions 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. In 2020, Exelon also announced that our six utilities will take major steps to electrify our fleet, setting a goal to electrify 30 percent of our vehicle fleet by 2025, increasing to 50 percent by 2030. This transition will be achieved through a combination of fully electric vehicles, vehicles with plug-in idle mitigation units and plug-in hybrids. This initiative covers a combined fleet of more than 7,200 vehicles and will provide valuable insights into how we can better support our communities in their desire to electrify transportation. Beyond our fenceline, our utilities are enabling transportation electrification by investing in two key areas through their EVSmart programs: 1) the distribution system investments that support customer demand for EVs, and 2) charging infrastructure investments as a result of utility ownership, incentives or rebates with cost recovery and return opportunities. Exelon's utilities invested almost \$6.6 billion across our regulated utilities in 2021 for grid advancements in reliability and resiliency, with \$4.35 billion specifically focused the electric distribution system, including integration of EV charging technologies or improving the systems to meet this new growth in demand. Exact investment in grid advancement directly or indirectly relating specifically to EV programs resulting from climate change is not currently broken out in our financial disclosures, but we have developed a table in our CSR page 25 that describes the key focus areas of Exelon's future investment plan in more detail.

### **Comment**

No Comment

---

### **Identifier**

Opp2

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

Downstream



**Opportunity type**

Energy source

**Primary climate-related opportunity driver**

Use of new technologies

**Primary potential financial impact**

Increased value of fixed assets

**Company-specific description**

Due to our state utility regulatory framework and business model, Exelon's utilities are generally unable to directly invest in and own power generation resources. However, our utilities use other means to enable renewable energy investment and deployment in our service territories by third parties. For example, we are deploying smart meter technology to integrate local generation and making other physical grid improvements. Through net metering, utilities purchase excess electricity produced from residential and commercial customers' renewable energy equipment. At year-end of 2021, Exelon utilities had a total of 173,284 customers with 2,660 megawatts (MW) of renewable energy generation resources installed, primarily solar photovoltaic systems, with a limited amount of wind and other resources.

But purchasing that distributed resource is only the beginning of the opportunities for the distribution utilities. A smart grid is a modern electrical system that uses automated data collection, two-way communications, and technology to deliver energy more reliably and efficiently. It provides data on hourly energy usage for customers and allows utilities to control and monitor the power system at a much more granular level than was previously possible. By investing in a smarter grid, we enable an electric system that is reliable, resilient, responsive, efficient and secure. Our customers benefit through instant access to energy information, faster outage detection and response, enhanced reliability, greater energy efficiency and increased involvement in the energy system.

**Time horizon**

Medium-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**

As Exelon supports the integration of distributed energy systems, there are increase opportunities to invest the expansion of our system and our ability to control these two way flows. Exact financial impact of increased solar enablement is dependent on our ability to recover our increased investment and the development of policies around the utilities role in the management of these systems.

**Cost to realize opportunity**

**Strategy to realize opportunity and explanation of cost calculation**

Exelon's utilities have worked over the last several years to develop common approaches and platforms to assist and enable customers and contractors to deploy residential and commercial renewable energy, primarily solar photovoltaics, in our utility service areas. Each utility's Green Power Connection website has resources to assist customers from start to finish on their renewable energy projects. Digital Solar Toolkits are a flagship resource from our Green Power Connection programs, offering solar calculators to help customers evaluate their options and other tools and tips to assist in decision-making. For customers deciding to install solar, the toolkits help them select qualified solar contractors, monitor project progress, track energy usage and calculate savings.

From the Exelon perspective, increased interest in distributed generation presents an opportunity to support our communities' preferences in their interests and ensure it can be done with reliability in mind. Therefore, we similarly invest in upgrades to our system to support these



efforts. Exelon's regulated utilities invested almost \$6.6 billion in 2021 for grid advancements in reliability and resiliency, with \$4.35 billion specifically focused the electric distribution system, including integration of distributed solar enabling technologies or improving the systems to meet this new distributed supply . Exact investment in grid advancement directly or indirectly relating specifically to distributed generation programs is not currently broken out in Exelon public disclosures, but we have developed a table in our CSR page 25 that describes the key focus areas of Exelon's future investment plan in more detail.

**Comment**

No Comment

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**Identifier**

Opp3

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

Upstream

**Opportunity type**

Energy source

**Primary climate-related opportunity driver**

Use of lower-emission sources of energy

**Primary potential financial impact**

Increased revenues through access to new and emerging markets

**Company-specific description**

As an energy T&D company, Exelon is preparing to deliver a range of clean energy options to our customers and communities. To support these efforts, we liaise with national labs, industry associations, developers and marketers to understand the emerging technological and economic landscape for clean fuels such as hydrogen and biomethane, also known as renewable natural gas (RNG). These fuels have the potential to reduce the overall methane or carbon dioxide equivalent (CO<sub>2</sub>e) content of the gas we deliver to customers over time.



New technologies and energy options continue to emerge that allow us to leverage our delivery systems to further drive decarbonization. Renewable natural gas and hydrogen offer opportunities to adapt our existing natural gas distribution systems into clean-fuel networks that can be optimized and coordinated with our co-located electric distribution systems to drive an integrated approach to decarbonization. We see these clean fuels as an opportunity to ensure our gas distribution systems can be part of an integrated energy solution that supports an affordable, reliable clean energy future by providing customers access to a range of energy solutions.

**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**

Because the use of biofuel blending is still emerging, we are not able to estimate the potential financial impact of this opportunity at this time.

**Cost to realize opportunity**



**Strategy to realize opportunity and explanation of cost calculation**

RNG is the most market-ready of these options today and we have already taken steps in our utility jurisdictions to establish interconnection standards to use this gas. RNG is produced from the capture, cleaning and reuse of methane where it would otherwise have been released through decomposition of organic materials from sources such as dairies, food waste facilities or wastewater treatment plants. BGE was the first utility in Maryland with an approved interconnection for RNG. Bioenergy Devco has developed Howard County, Maryland’s flagship anaerobic digestion facility that will produce RNG from food waste.

We are supporting thought leadership and exploring the technical aspects of hydrogen blending in our gas distribution system through various partnership R&D efforts. For example, with the support of a \$1 million ARPA-E grant from the U.S. Department of Energy, our experts are supporting the University of Maryland to develop a novel approach for applying protective coatings to gas distribution pipelines that could prolong their service life and support hydrogen blending in legacy pipelines. We participate in the HyBlend consortium of national lab and industry partners that is addressing the technical barriers to blending hydrogen in natural gas infrastructure and is studying life-cycle emissions of hydrogen blends. In addition, Exelon is an anchor sponsor in the EPRI-GTI Low Carbon Research Initiative that is researching lower carbon fuels along the value chain. Exact investment in RNG partnership and pilots programs are not currently broken out in Exelon public disclosures.

**Comment**

## **C3. Business Strategy**

### **C3.1**

**(C3.1) Does your organization’s strategy include a transition plan that aligns with a 1.5°C world?**

**Row 1**

**Transition plan**

No, our strategy has been influenced by climate-related risks and opportunities, but we do not plan to develop a transition plan within two years



**Explain why your organization does not have a transition plan that aligns with a 1.5°C world and any plans to develop one in the future**

As an essential service provider, we operate under regulation by public utility commissions and must manage our activities with consideration for the different priorities of the various jurisdictions in which we operate. We have begun to consider how these policies and expectations align with what is necessary for a successful transition, and where local support of certain technologies, customer programs or supply of certain low-carbon fuels might influence decarbonization pathways, but are hesitant to commit to having a fully developed transition plan within 2 years given the extreme measures that would be needed for a 1.5C degree conformant plan as stipulated by CDP and given our need to seek approval at the jurisdictional level for actions we take.

We do report in TCDF recommended format in our Corporate Sustainability Report (pg 65-80) describing our overarching approach to support a clean energy future, as well as our key focus areas of physical adaptation, beneficial electrification with decarbonization of electricity supply, emergence of low-carbon fuels, and the support of new low-carbon energy technologies. Exelon has begun to evaluate various climate change scenarios and common across all potential pathways leading to future decarbonization is large-scale and rapid deployment of zero-carbon energy solutions to avert the most severe impacts of climate change. Climate change adaptation across the areas we serve is also needed regardless of mitigation actions.

Community goals and plans, regulatory and market structures, as well as the industries and resources available, are all considerations for how far and how fast the transition may occur and to what extent the above elements may prove to be an opportunity or risk to each of our utility businesses. The economic health of the community is also relevant to ensuring that all parts of the community can have access to clean, reliable energy and that local workforces are developed to support a just and equitable transition. Each of our utilities is working with their communities and state regulators to maximize their positive impact in helping to attain community goals, while stimulating local economies. As a distribution utility, we know our partnership is key to ensuring that our customers are well represented in the transition conversation both from the perspective of ensuring reliable supply for all end uses and maintaining affordability of that supply for all energy users in our territory.

**C3.2**

**(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?**

	Use of climate-related scenario analysis to inform strategy
Row 1	Yes, qualitative and quantitative



### C3.2a

**(C3.2a) Provide details of your organization’s use of climate-related scenario analysis.**

Climate-related scenario	Scenario analysis coverage	Temperature alignment of scenario	Parameters, assumptions, analytical choices
Transition scenarios DDP	Company-wide		<p>Details on scenario identification: Exelon evaluated national, economy-wide climate change scenarios in 2018 and 2019 to help the enterprise better understand the implications for the energy economy, customers and the communities where we operate. Our scenarios have aligned with the Intergovernmental Panel on Climate Change (IPCC) 2°C and 1.5°C ambitions to explore the difference in the level of effort needed between an 80 percent reduction by 2050 and Net-Zero by 2050 targets and potentially different pathways for achievement of those goals. We used scenario analysis to gain insight into the societal costs of various alternative actions and the timeline when new technologies need to be commercially available. We have also worked with peers and industry groups to explore other potential pathways and perspectives on how policies and technologies may evolve. We have incorporated both qualitative and quantitative learnings from this scenario work into our business and climate change response strategies, and we continue to do so as scenario modelling techniques evolve, and as other studies are published. While no scenario can predict the future, thoughtfully designed scenarios can inform how to prepare for it, drive towards lower cost pathways and identify when shifting to a different pathway might be appropriate. All scenarios suggest implications for how consumers will access and consume energy, and at what cost, and each presents opportunities and risks for Exelon and implications for how we might address those opportunities and risks through our electric and gas delivery utilities.</p> <p>Parameters: Potential load changes as a result of carbon mitigation efforts (short-term reductions from energy efficiency and longer-term increasing/changing demand because of electrification); Increased interest in distributed generation; Potential asset damage or population shifts due to changing climate; New technologies for energy measurement and management</p>



			<p>Assumptions: Electric supply grid decarbonization; sales and stock turn-over to lessen costs by maximizing use of typical life; continued current level of service</p> <p>Analytical choices: through 2050, successful achievement of emissions reduction ambition without specified policy solution, publicly sourced base data or existing studies.</p>
Physical climate scenarios RCP 4.5	Company-wide		<p>Details on scenario identification: The science of climate change is compelling, and the evidence of physical damages occurring now and in the future is clear. However, the extent of these changes at a local level presents some uncertainty. Accordingly, Exelon is incorporating physical climate change data available from the National Oceanic and Atmospheric Administration (NOAA) and the IPCC emissions scenarios and the associated climate impacts described in the U.S. National Climate Assessment (NCA) into our business strategy and engineering planning processes both quantitatively and qualitatively as possible. Exelon’s operating companies each face physical risks associated with the extreme events typical to their location and projections suggest that they will likely be subject to increased severity and frequency over time. For our East Coast utilities, these acute physical risks include severe thunderstorms, tropical storms and hurricanes, but in recent years have also included derecho windstorms and tornados. For our Midwest utility, acute physical risks include severe thunderstorms, tornados, derecho windstorms and ice storms. More chronic in nature, all Exelon utilities have begun to note more intense rainfall as well, which has caused inland flooding along streams and over roadways, as well as varying degrees of heat increases, with combined heat and humidity increases. In the Mid-Atlantic, our coastal utilities also face issues associated with potential sea level rise in some of the areas that they serve.</p> <p>Parameters: Acute physical risks are event-driven, and include extreme weather events, such as cyclones, hurricanes and floods. Chronic physical risks are longer-term shifts in climate patterns, such as sustained higher temperatures, changes to typical precipitation patterns and sea level rise, which may cause ongoing issues for the communities in our service territories.</p> <p>Assumptions: Average temperatures, Max temperatures, number of days over 95 degrees, average precipitation, days with over 3 inches precipitation, minimum temperature, hurricane return rates, storm</p>



			<p>specific winds and rainfall, sea level rise</p> <p>Analytical choices: Emissions mitigation is achieved such that there is less than a 1.5 degrees increase in global average temperatures by 2100. Downscaled data as available through NOAA's Climate Change toolkit and the NCA is the source of the projections used.</p>
Physical climate scenarios RCP 8.5	Company-wide		<p>Details on scenario identification: The science of climate change is compelling, and the evidence of physical damages occurring now and in the future is clear. However, the extent of these changes at a local level presents some uncertainty. Accordingly, Exelon is incorporating physical climate change data available from the National Oceanic and Atmospheric Administration (NOAA) and the IPCC emissions scenarios and the associated climate impacts described in the U.S. National Climate Assessment (NCA) into our business strategy and engineering planning processes both quantitatively and qualitatively as possible. Exelon's operating companies each face physical risks associated with the extreme events typical to their location and projections suggest that they will likely be subject to increased severity and frequency over time. For our East Coast utilities, these acute physical risks include severe thunderstorms, tropical storms and hurricanes, but in recent years have also included derecho windstorms and tornados. For our Midwest utility, acute physical risks include severe thunderstorms, tornados, derecho windstorms and ice storms. More chronic in nature, all Exelon utilities have begun to note more intense rainfall, which has caused inland flooding along streams and over roadways, as well as varying degrees of heat increases over the coming years, with combined heat and humidity increases. In the Mid-Atlantic, our coastal utilities also face issues associated with potential sea level rise in some of the areas that they serve.</p> <p>Parameters: Acute physical risks are event-driven, and include extreme weather events, such as cyclones, hurricanes and floods. Chronic physical risks are longer-term shifts in climate patterns, such as sustained higher temperatures, changes to typical precipitation patterns and sea level rise, which may cause ongoing issues for the communities in our service territories.</p> <p>Assumptions: Average temperatures, Max temperatures, number of days over 95 degrees, average precipitation, days with over 3 inches precipitation, minimum temperature, hurricane return rates, storm</p>





			<p>specific winds and rainfall, sea level rise</p> <p>Analytical choices: Emissions mitigation is NOT achieved such that there is a 4 degrees increase in global average temperatures by 2100. Downscaled data as available through NOAA's Climate Change toolkit and the NCA is the source of the projections used.</p>
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### C3.2b

**(C3.2b) Provide details of the focal questions your organization seeks to address by using climate-related scenario analysis, and summarize the results with respect to these questions.**

**Row 1**

**Focal questions**

Exelon explores how these transitions may impact our business model and how changing conditions may affect existing assets over their current lifespan. Most risks are ones that our utilities have been managing for decades, such as the effects of weather on our systems. In many instances, climate change is a potential risk multiplier to standing risks that have long been identified by our utilities and for which we have long-standing programs to manage risks and maintain system investment to support reliability. However, climate change adds new considerations to the mix that require us to look more broadly throughout the energy sector to explore new technologies and to better understand opportunities where our business might evolve to be successful into the future.

GHG Mitigation/Transition Scenarios: Help us to identify opportunities and risks associated with potential changes to energy systems as a result of new technologies, changing customer expectations and/or emerging voluntary GHG reductions focused on achieving mitigation goals and/or local, state or federal regulatory requirements should they be implemented.

We are seeking to identify emerging drivers for decarbonization. Mitigation/transition risks depend on technology development and cost, consumer response and the evolution of power markets and future legislation and regulatory structures. Customers and community preferences and actions depend on a combination of these factors; therefore, transition risks are inherently uncertain. As ambition has grown from a 2°C solution (80 percent reduction by 2050) to 1.5°C solutions that require Net-Zero by 2050, Exelon has similarly deepened our consideration of various potential decarbonization pathways, as well as increased our engagement in new technologies needed to achieve these goals and the policies need to encourage and enable those new technologies in the energy sector. It is clear that all deep decarbonization pathways require

broad actions and consideration of the implications of changing technologies or approaches at the scale required to transition the economy. Timely and effective policy measures are crucial to coordinate sectors through such a transformation and ensure that energy stays affordable, reliable and accessible to all.

Physical Climate Scenarios: Helps us to identify risks of physical climate changes and how these may manifest as changes to current weather patterns that affect our energy delivery assets and/or our customers' uses and energy needs. The evidence of physical damages occurring now and in the future is clear. However, the extent of these changes at a local level presents some uncertainty. Accordingly, Exelon is incorporating physical climate change data available from the National Oceanic and Atmospheric Administration (NOAA) and the IPCC emissions scenarios and the associated climate impacts described in the U.S. National Climate Assessment into our business strategy and engineering planning processes.

### **Results of the climate-related scenario analysis with respect to the focal questions**

GHG Mitigation/Transition Scenarios:

As an energy delivery utility operating under regulation by public utility commissions in different states, with different climate action plans and priorities, as informed by our ongoing scenario analysis work, we are positioning ourselves as a key partner in supporting the achievement of these local goals, while also seeking and cross-pollinating innovative solutions as they emerge and can be shared between our utilities. We maintain alignment in our approach through the following priorities:

- 1) Electrification coupled with simultaneous decarbonization of electricity generation is one key lever for emissions reductions, making necessary both growth and evolution of clean grid electric generation and transmission, enablement / expansion of zero-carbon generation on local level distribution systems and significant vehicle electrification, all requiring enhanced grid management.
- 2) Low-carbon fuels are another key lever for future emissions reductions, requiring emergence and commercialization of low-carbon fuel technologies including renewable natural gas and hydrogen, and a safe and reliable means to deliver increasing levels of those new fuels to customers.
- 3) New technologies will also be a key lever for longer-term emissions reductions and potentially for removing carbon dioxide from the atmosphere, including carbon capture and sequestration, integration of storage into the grid and other technologies that support energy efficiency, demand and flexible load management and electrification.

Community support, regulatory and market structures, as well as the industries and natural resources most available, are all considerations for how far and how fast decarbonization may occur.

Physical Climate Scenarios:

For our East Coast utilities, these acute physical risks include severe thunderstorms, tropical storms and hurricanes, but in recent years have



also included derecho windstorms and tornados. For our Midwest utility, acute physical risks include severe thunderstorms, tornados, derecho windstorms and ice storms. More chronic in nature, all Exelon utilities have begun to note more intense rainfall, which has caused inland flooding along streams and over roadways, as well as varying degrees of heat increases over the coming years, with combined heat and humidity increases. In the Mid-Atlantic, our coastal utilities also face issues associated with potential sea level rise in some of the areas that they serve. Through these studies we have recognized gaps in the types of projection data that would be most useful in re-calibrating future focused engineering standards, as well as a high level of uncertainty which makes consuming and implementing the quantitative data directly challenging. We continue to work with NOAA and others to build consensus data that can be credibly used in cost benefit analysis and rate cases that need to show prudence of spend associated with infrastructure investments.

### C3.3

**(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	High Impact. Our customers' expectations have changed in part because of the issue of climate change. Customers seek greater control over energy efficiency, active management of home energy usage and local generation in homes and businesses. Also, transition scenario work indicates that demand management and flexible loads are important, given the key role electrification plays in most decarbonization pathways, futures to help minimize peak demands and associated costs. As a result, Exelon is creating a smart power grid to advance clean and affordable energy choices, deliver a world-class customer experience, safely powering reliability and resilience, and support our communities through the creation of a smart grid that uses automated data collection, two-way communications and technology to deliver energy more reliably and efficiently. It provides data on hourly energy usage for customers and allows utilities to control and monitor the power system at a much more granular level than was previously possible. In 2021, Exelon invested more than \$6.6 billion across our regulated utilities and plans to invest almost \$29 billion from 2022 through 2025 in its transmission and distribution systems with these focus areas in mind. This includes upgrading 10.2 million smart electric and gas meters over the last 10 years (avoiding 10 million BGE service truck trips in 2021), helping customers



		<p>save over 22 million MWh of energy through our award-winning customer energy efficiency programs in 2021 (equivalent to 8.7 million metric tons of CO2e emissions avoided), and developing Green Power Connection, common approaches and platforms to assist and enable customers and contractors to deploy distributed renewable energy in our utility service areas, which has enabled 173,284 customers to install 2,660 megawatts (MW) of renewable energy generation resources through 2021. Relating to vehicle electrification, through DOE funding, BGE has partnered with Lyft to deploy 100 EVs in the Baltimore area for ride-hailing services and associated chargers, and launched a Smart Charge Management pilot program to allow the company and our vendors (Greenlots and Weavegrid) to remotely control EV charging by increasing, decreasing or curtailing charging to better correspond to electric grid needs, much like a demand response program.</p>
<p>Supply chain and/or value chain</p>	<p>Yes</p>	<p>Moderate Impact. Exelon recognizes the climate change related risks that could disrupt our supply chain as a result of physical climate change impacts or a transition to a lower carbon economy which could affect pricing and availability. This has influenced our strategy for the short and mid-term time periods by increasing our focus on relationship building with our suppliers. Exelon works with approximately 4,000 suppliers to procure a wide range of materials and services. We actively engage, evaluate and monitor our suppliers to better understand our supply chain and proactively identify and address potential business continuity or related risks. We also work to align Exelon’s sourcing practices with company objectives in environmental responsibility, supplier diversity and local economic development. In December 2021, Exelon conducted its semi-annual detailed risk assessment that identified 69 critical Tier 1 suppliers for its utilities. These Tier 1 suppliers represent 36 percent of total spend. These risk assessments include a review of the Supplier’s Business Continuity Plan which would cover potential disruption from natural events that may be increasing as a result of climate change. In 2022 we are implementing a new Supplier Code of Conduct that sets forth expectations for all suppliers, contractors and agents. 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), an organization of utilities and suppliers working together to advance sustainability best practices in utility supply chain activities and supplier networks. Exelon has continued to pursue progress against the Alliance’s sustainability maturity model by conducting a Scope 3 GHG emissions hot spot analysis, refining our Scope 3 reporting for “purchased goods and services” and “capital</p>



		expenditures”, and beginning supply engagement around GHG emissions based on the more Exelon-specific hot spot analysis. Exelon continues to recommend supplier participation in the Alliance and the EUISCA Supplier Affiliate Membership program.
Investment in R&D	Yes	High Impact. Rapidly advancing technology is transforming every component of our transmission and distribution system (T&D) and our customer-facing engagements. Low carbon energy technologies are growing and achieving scale. Piloting and leveraging new technologies enable the delivery of lower cost, higher value and cleaner services. This has influenced our strategy over the short and mid-term by focusing our activities on emerging technologies that support GHG emissions reductions and grid resiliency. Over the past few years, Exelon has created an ecosystem to foster innovation and manage all phases of emerging technologies. and our Business and Technology Signals monitoring efforts, Corporate Strategy leads teams to evaluate technologies and emerging trends that have the potential to affect the enterprise and transform the industry, collaborating with industry associations, national labs, top universities and emerging business leaders to provide recommendations on how Exelon should best engage with the technology. TechEXChange and our Business and Technology Signals efforts evaluated opportunities across electrification, alternative fuels, battery storage and hydrogen, most recently exploring the potential of heat pumps to provide energy efficient solutions to buildings with greater efficiency and operability in colder climates. Exelon is actively exploring how each of these heat pump technologies can contribute to energy efficiency and decarbonization. Through our Partnership R&D Program, Exelon directly engages with early-stage technology innovation by funding and collaborating on projects at leading research institutions, including Argonne National Laboratory, Massachusetts Institute of Technology (MIT), Northwestern University and the University of Illinois. Over the last five years, the program has invested in 28 transformative projects, supporting strategic areas such as electrification, DER enablement, grid flexibility and low-carbon fuels. For example, with the support of DOEgrant, our experts are supporting the University of Maryland to develop a novel approach for applying protective coatings to gas distribution pipelines that could prolong their service life and support hydrogen blending in legacy pipelines. Exelon is an anchor sponsor in the EPRI-GTI Low Carbon Research Initiative that is researching lower carbon fuels.
Operations	Yes	High Impact. Exelon recognizes the risk to our operations both from physical climate change that may affect our assets, as well as the need to minimize carbon emissions resulting from our assets or in



		<p>association with our electric delivery services. This has influenced our strategy through how we view our day-to-day operations and near-term infrastructure planning, but also for the long-term as we make system investments with life spans well into the future. Exelon strives for operational excellence in maintaining a highly reliable electric and gas distribution system, with an increasing focus on resiliency in response to the effects of climate change, including increased weather extremes and sea level rise, as well as reducing GHG emissions. In August 2021, we announced our Path to Clean commitment to reduce our operations-driven emissions 50 percent by 2030 and achieve Net-Zero by 2050 while also supporting our customers and communities in achieving their clean energy goals. This commitment aligns our operating companies around decarbonization and integrates the below short-, mid- and long-term climate change Path to Clean imperatives into our business strategy. We are initiating key short-term, mid-term, and long-term actions now with portions of mid- and long-term actions dependent upon new and emerging technologies and solutions that we will continue to evaluate and invest in over time. Relating to our operations specifically we are focusing on reducing GHG emissions in our buildings, our fleet Vehicles, our electrical systems through improved management and reduced leakage of SF6, reduced methane emissions through gas system pipe replacements, and other specific sources as possible. Where we have control over GHG emissions, we are reducing them in alignment with national long-term strategy for decarbonization and a 1.5°C pathway ambition.</p>
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### C3.4

**(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.**

	Financial planning elements that have been influenced	Description of influence
Row 1	Capital expenditures	As a result of increased customer interest in climate change action and our communities' growing focus on GHG emissions reduction and climate resiliency, and insights gained from our climate scenario work, Exelon has been developing and implementing a strategy for its utilities to invest in support of the execution of this plan. Our utilities' strategy is one that harnesses the power of digital communication, remote sensing, distributed and artificial intelligence, distributed energy resources (DER) and the platform of smart infrastructure to reinforce human connections and serve a



	<p>hierarchy of community needs ranging from the traditional basic T&amp;D services to new uses for utility systems enabled by technology. Our plan requires investment and focus in four key connected community areas: (1) reliability and safety, (2) resilience and security, (3) increased consumer choice and access to DER, and (4) decarbonization and beneficial electrification in residential, business, transportation and other opportunity areas. As we work toward our vision, we are collaborating with stakeholders and policymakers on regulatory matters to achieve the benefits of this vision. Over the next decade, we will move toward achieving similar outcomes for all of our customers and communities, but with tailored utility-by-utility implementation based on local and state circumstances. As we learn from our work and partner with stakeholders to better understand value creation in their communities, we will develop more sophisticated program demonstrations. We have created a peer group resource to share best practices and other information among our utility companies. In 2021, Exelon invested almost \$6.6 billion across our regulated utilities and plans to invest approximately \$29 billion from 2022 through 2025 in grid modernization and resilience.</p> <p>As states and companies make commitments to cleaner, renewable generation sources, the electrification of end uses continues to grow as a key source of decarbonization. In Washington D.C., Pepco's Climate Solutions Plan is an overarching blueprint for how the grid can enable the District to meet its established goals, policies and studies; it proposes a range of energy efficiency- and electrification-based actions across four portfolios and through 62 programs that leverage the unique role of the electric grid as an enabler of decarbonization. As reliability is foundational to the broad electrification envisioned within the District's policies, Pepco's plan approaches decarbonization and electrification targets investments that also maintain the ability to continue to provide safe and reliable service to all Pepco customers.</p> <p>In Illinois, the Climate and Equitable Jobs Act (CEJA) was enacted in 2021 to decarbonize the state's energy sector and transition it to clean and renewable energy with a focus on equitable job creation. As the largest electric utility in Illinois, ComEd is committed to implementing the new law that puts the state on a path to 100 percent clean energy by 2050 through the expansion of renewable energy, energy efficiency and electric vehicles, as well as programs to prepare diverse workers to join Illinois' future energy workforce.</p> <p>In Pennsylvania, PECO is a leading advocate of legislation to authorize utilities to recover the costs of EV infrastructure incentives and support the deployment of charging infrastructure on essential public access corridors and in underserved communities. In November 2021, PECO obtained approval from the Pennsylvania Public Utility Commission for its</p>
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	<p>transportation electrification pilot programs to encourage the deployment of EV infrastructure for public transit and commercial customers. The pilot authorized more than \$1.5 million in funding for these programs and customer education efforts.</p> <p>Maryland. BGE and the PHI Maryland utilities have been executing some of the nation’s earliest and most innovative EV infrastructure and incentive programs since their 2019 launch of EVsmart initiatives in the state. From building an expansive network of utility-owned and -operated public EV chargers, to providing incentives to consumers and businesses to purchase and install smart EV chargers, to BGE’s implementing a first-of-its-kind EV-Only Time-of-Use rate without having to set a second meter at customers’ homes — the Exelon Maryland utilities have pushed Maryland to be in the top 10 of all states in rankings of EV readiness and friendliness.</p> <p>Over recent years the state of New Jersey has also advanced policies to decarbonize and electrify the New Jersey economy (Energy Master Plan, Clean Energy Act, E.O. 92). One of these strategies aims at reducing energy consumption and emissions from the building sector through decarbonization and electrification of new and existing buildings, including expansion of statewide net-zero carbon homes incentive programs, development of EV-ready and Demand Response-ready building codes and establishment of a long-term building decarbonization roadmap. Additionally, ACE is improving access to clean electric transportation options for all communities across its service area. The EVsmart program provides rebates and incentives to support the development of 3,250 EV charging ports in public spaces, businesses and residences across South Jersey.</p> <p>Exelon’s strategy is focused on our customers, through focusing our capital expenditures prudently on modernizing our energy infrastructure for safe, reliable and resilient service; clean and affordable energy choices; and more equitable communities.</p>
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## 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.**

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**Target reference number**

Abs 1

**Year target was set**

2021

**Target coverage**

Company-wide

**Scope(s)**

Scope 1

Scope 2

**Scope 2 accounting method**

Market-based

**Scope 3 category(ies)**

**Base year**

2015

**Base year Scope 1 emissions covered by target (metric tons CO<sub>2</sub>e)**

678,075



**Base year Scope 2 emissions covered by target (metric tons CO2e)**

121,818

**Base year Scope 3 emissions covered by target (metric tons CO2e)**

**Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

799,892

**Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1**

100

**Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

2

**Base year Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

**Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

11

**Target year**

2030

**Targeted reduction from base year (%)**

50

**Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]**

399,946

**Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

466,714



**Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

71,499

**Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

**Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

538,213

**% of target achieved relative to base year [auto-calculated]**

65.4285828587

**Target status in reporting year**

Underway

**Is this a science-based target?**

No, and we do not anticipate setting one in the next 2 years

**Target ambition**

**Please explain target coverage and identify any exclusions**

In 2021, Exelon expanded and extended its GHG goal to a 50% reduction from a 2015 baseline by 2030 as an interim target to a goal of Net-Zero by 2050. This goal is in aligns with the ambitions of the Long-term Strategy of the United States which is in alignment with a science-based 1.5 degree ambition. Emissions sources covered by this goal includes 100% of our Scope 1 emissions and the Operations-driven portion of our Scope 2 emissions, incorporating 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. Our goal does exclude Scope 2 emissions associated with electric system line losses, since these are not fully within our control, driven more by customer demand and the emissions rate of the broader electric grid. It should be noted, that for these other sources, Exelon does maintain performance management indicators such as % loss of MWh delivered, as well as a variety of customer programs designed to promote energy efficiency and minimize peal loads on the system. Given our current business model, Exelon does not own electric generation. But we are also continuing to advocate for cost effective national policy to drive decarbonization of the electric supply grid, since that is also a big driver of emissions



associated with line losses. Exelon has reviewed the Science-based Target Indicatives methodologies and discussed our business model with that organization, however at this time their electric sector methodology is design for a vertically owned utility business model where electric generation is owned by the utility, and not conducive for use by a delivery-only utility business model like Exelon's where do not have direct control over the supply of the electricity that we deliver.

**Plan for achieving target, and progress made to the end of the reporting year**

Exelon is focusing on four key levers for our Path to Clean 2030 50% reduction goal. We have established a fleet vehicle electrification program targeting to have 30% of our fleet vehicles to be electrified by 2025, 50% to be electrified by 2030 , and annual replacements of light duty vehicles to be 100% electrified by 2025, with all light duty assets electrified by 2030. Exelon is also focusing on continued focus on SF6 management, natural gas pipe main replacement programs, and building energy efficiency. As of the end of 2021, we are 2/3rds of the way to our goal.

**List the emissions reduction initiatives which contributed most to achieving this target**

**C4.2**

**(C4.2) Did you have any other climate-related targets that were active in the reporting year?**

- Target(s) to reduce methane emissions
- Net-zero target(s)
- Other climate-related target(s)

**C4.2b**

**(C4.2b) Provide details of any other climate-related targets, including methane reduction targets.**

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**Target reference number**

Oth 1

**Year target was set**



2018

**Target coverage**

Business division

**Target type: absolute or intensity**

Intensity

**Target type: category & Metric (target numerator if reporting an intensity target)**

Energy consumption or efficiency

Other, please specify

MWh of electricity lost in distribution

**Target denominator (intensity targets only)**

Other, please specify

MWh of Total Electricity on System

**Base year**

2016

**Figure or percentage in base year**

7.2

**Target year**

2021

**Figure or percentage in target year**

6.9

**Figure or percentage in reporting year**

6.9

**% of target achieved relative to base year [auto-calculated]**

100

**Target status in reporting year**

Achieved

**Is this target part of an 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 supports the Long-term Strategy of the United States which is in alignment with a science-based 1.5 degree ambition.

**Is this target part of an overarching initiative?**

Other, please specify

This effort directly supports the Long-term Strategy of the United States which is in alignment with a science-based 1.5 degree ambition.

**Please explain target coverage and identify any exclusions**

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. The reported base year is the first full year of reporting for all of Exelon's utilities and is used as a benchmark. Coming in under the target is preferred and reflects the significant investment we are making in grid modernization. This metric is not established as a formal goal because ultimately line losses are dependent upon the particulars of load and demand on the grid, as well as temperature and grid congestion. Exelon invested \$6.6 billion across its regulated utilities in 2021 and plans to invest approximately \$29 billion from 2022 through 2025 with the intent to improve grid reliability, resiliency and efficiency. This metric helps measure the direct impact of those investments on Scope 2 emissions associated with line losses. Combined with our other two GHG program focus areas, this ensures then management of 100% of our GHG inventory.

**Plan for achieving target, and progress made to the end of the reporting year**

**List the actions which contributed most to achieving this target**



Exelon has been continually making prudent investments in its electric distribution system to ensure that it is evolving to support the latest technologies and efficiencies. For example, we have upgraded over 10.2 million smart electric and gas meters over the last 10 years across the Exelon utilities, enabling a wide range of system and customer benefits. These new meters allow the utilities to remotely connect or disconnect service, provide enhanced information to help 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.

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**Target reference number**

Oth 2

**Year target was set**

2016

**Target coverage**

Business division

**Target type: absolute or intensity**

Intensity

**Target type: category & Metric (target numerator if reporting an intensity target)**

Methane reduction target

Other, please specify

Miles of cast iron and unprotected steel pipe in current year

**Target denominator (intensity targets only)**

Other, please specify

Total miles of cast iron and unprotected steel on system in 2015

**Base year**

2015



**Figure or percentage in base year**

1

**Target year**

2021

**Figure or percentage in target year**

0.86

**Figure or percentage in reporting year**

0.73

**% of target achieved relative to base year [auto-calculated]**

192.8571428571

**Target status in reporting year**

Achieved

**Is this target part of an emissions target?**

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 amount on the system in 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 2.5% per year through 2021. This performance also supports the emissions reductions as reported in our Operations-Driven GHG reduction goal as discussed in Abs 1.

**Is this target part of an overarching initiative?**

Other, please specify

This effort directly supports the Long-term Strategy of the United States which is in alignment with a science-based 1.5 degree ambition.

**Please explain target coverage and identify any exclusions**





This target covers fugitive emissions from our natural gas distribution systems at our utilities BGE, PECO and DPL. These are part of our Scope 1 GHG emissions inventory and included in our main Operations-Driven emissions reduction goal described in Abs 1.

**Plan for achieving target, and progress made to the end of the reporting year**

**List the actions which contributed most to achieving this target**

Three of Exelon's utilities — PECO, BGE and DPL — provide natural gas distribution service to customers through over 16,500 miles of gas mains. In 2021, 189.5 billion cubic feet of natural gas was delivered to customers by Exelon's gas utilities, providing fuel for heating, cooking and manufacturing processes. 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. As Exelon recognizes the importance of gas delivery systems in a reliable and resilient integrated energy system of the future, we are working to modernize these systems to increase safety, reduce methane leakage and ready these systems to be a part of the decarbonization solution by carrying increasing amounts of low emissions fuels like renewable natural gas and hydrogen. This has been an ongoing effort and Exelon's capital plans call for about \$3.7 billion of capital investment in our utilities' natural gas systems over the next four years. 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 no later than 2037. Since 2015, our pipe replacement programs have reduced methane emissions by over 100,000 metric tons of carbon dioxide equivalents (CO<sub>2</sub>e), and our emissions per weather-corrected throughput has declined from 0.44 percent to 0.34 percent.

**C4.2c**

**(C4.2c) Provide details of your net-zero target(s).**

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**Target reference number**

NZ1



**Target coverage**

Company-wide

**Absolute/intensity emission target(s) linked to this net-zero target**

Abs1

**Target year for achieving net zero**

2050

**Is this a science-based target?**

No, and we do not anticipate setting one in the next 2 years

**Please explain target coverage and identify any exclusions**

Emissions sources covered by this goal includes 100% of our Scope 1 emissions and the Operations-driven portion of our Scope 2 emissions, incorporating 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. Our goal does exclude Scope 2 emissions associated with electric system line losses, since these are not fully within our control, driven more by customer demand. It should be noted, that for these other sources, Exelon does maintain performance management indicators such as % loss of MWh delivered, as well as a variety of customer programs designed to promote energy efficiency and minimize peak loads on the system. Given our current business model, Exelon does not own electric generation. But we are also continuing to advocate for cost effective national policy to drive decarbonization of the electric supply grid, since that is also a big driver of emissions associated with line losses. Exelon has reviewed the Science-based Target Indicatives methodologies and discussed our business model with that organization, however at this time their electric sector methodology is design for a vertically owned utility business model where electric generation is owned by the utility, and not conducive for use by a delivery-only utility business model like Exelon's where do not have direct control over the supply of the electricity that we deliver.

**Do you intend to neutralize any unabated emissions with permanent carbon removals at the target year?**

Yes

**Planned milestones and/or near-term investments for neutralization at target year**

In 2021, Exelon expanded and extended its GHG goal to a 50% reduction from a 2015 baseline by 2030 as an interim target to a goal of Net-Zero by 2050. This goal is in aligns with the ambitions of the Long-term Strategy of the United States which is in alignment with a science-

based 1.5 degree ambition. This 2030 is an absolute reduction goal which we are focused on achieving before applying offsets. Our focus is first on reducing emissions where we can, and on supporting new technologies that can reduce emissions even further. We recognize that there may be a need to use carbon offsets over time to meet our goal where emissions cannot be eliminated, but the science and guidance around the use of offsets is still emerging. We plan to continue to engage with stakeholders in that conversation as it develops and incorporate it as a piece of our longer-term strategy only if needed.

### **Planned actions to mitigate emissions beyond your value chain (optional)**

Our near-term actions are focused on driving emissions reductions in our buildings, fleet vehicles, SF6 leakage, and leakage from natural gas pipe mains and services. Over time we are also planning to explore emissions reduction opportunities for emergency generation and refrigerants. Beyond our operational boundary, we are also working with our communities to drive expansion of public vehicle charging, enable distributed solar on our distribution system, explore usage of battery storage for reliability and clean fuel blending to support emissions reductions from natural gas use. We have award winning programs for customer energy efficiency and demand response - and are exploring future use of 2-way flexible load to also support grid management. In the public advocacy space we are supporting policies that help to drive cost effective decarbonization of the grid supply. We are also partnering with national labs, universities, and research consortia to research, develop and pilot clean technologies. For example, we are a sponsor of the EPRI-GTI Low Carbon Research Initiative; We are supporting small businesses actively exploring climate solutions in our communities through the Climate Change Investment Initiative of our Foundation; and as a part of the Path to Clean, we have also committed to partnering with our community stakeholders to help meet their climate and emissions goals. All of these efforts will help us achieve our Net-Zero goal and to support our customers and communities in achieving their clean energy goals.

## **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.**



	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	36	
To be implemented*	31	6,963,593
Implementation commenced*	31	6,971,216
Implemented*	27	6,979,378
Not to be implemented	0	

### C4.3b

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

**Initiative category & Initiative type**

Fugitive emissions reductions  
Oil/natural gas methane leak capture/prevention

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

19,162

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

**Voluntary/Mandatory**

Voluntary

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

401,486

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



208,610,000

**Payback period**

No payback

**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 85 miles of cast iron main and 19 miles of unprotected steel replaced (over 5.25%) in 2021. 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 2022, under question 4.3a, as well as towards performance under 4.1a Abs1 and 4.2b Oth 2 KPI for methane emissions. Emissions, investment and cost savings which are provided are related to the 2021 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.

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**Initiative category & Initiative type**

Low-carbon energy generation  
Solar PV

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

1,166,832

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)



**Voluntary/Mandatory**

Voluntary

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

137,686,176

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

**Payback period**

<1 year

**Estimated lifetime of the initiative**

16-20 years

**Comment**

Exelon's utilities have worked over the last several years to develop common approaches and platforms to assist and enable customers and contractors to deploy residential and commercial renewable energy, primarily solar photovoltaics, in our utility service areas. Each utility's Green Power Connection website has resources to assist customers from start to finish on their renewable energy projects. Digital Solar Toolkits are a flagship resource from our Green Power Connect programs, offering solar calculators and other tools and tips to assist in decision making. Through net metering, utilities purchase excess electricity produced from residential and commercial customers' renewable energy equipment. This effort is counted as 4 projects implemented (relating one each to BGE, ComEd, PECO and PHI), with a similar 4 projects to be implemented in 2022. Emissions are based on estimated production of projects implemented in 2021 based on a system efficiency of 20% for solar PV. Investment breakdown relating to system upgrades needed to enable these systems (not the systems themselves) is not currently discretely reported. Savings are estimated customer savings based on an average cost per kWh across our territories. Actual cost and savings may differ. As investment benefits are beyond GHG emissions reductions and include performance and safety improvement, simple ROI analysis is not appropriate for this initiative.

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**Initiative category & Initiative type**

Fugitive emissions reductions



Other, please specify  
SF6 insulating gas

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

4,800

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 1

**Voluntary/Mandatory**

Voluntary

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

3,620

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

3,921,000

**Payback period**

<1 year

**Estimated lifetime of the initiative**

21-30 years

**Comment**

SF6 leakage occurs from high voltage electrical equipment that is part of 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 7 first-generation SF6 breakers in 2021, with 3 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 (one for each utility) implemented under 4.3a, one for each utility, and directly relates to our GHG reduction goal as described in 4.1a Abs1.

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**Initiative category & Initiative type**

Low-carbon energy consumption  
Biogas

**Estimated annual CO<sub>2</sub>e savings (metric tonnes CO<sub>2</sub>e)**

1,280

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

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)**

165,030

**Payback period**

No payback

**Estimated lifetime of the initiative**

<1 year

**Comment**





Exelon's utilities ComEd and PECO offsets indirect emissions from their own electricity use through the retirement of renewable energy credits (RECs) to support our net GHG annual target. In 2021, they retired an additional 100018 RECs, 3,348 MWhs more by percent of total use than the prior year. REC certificates purchased are Green-e Certified, which insures they are sourced in the United States, and are retired in support of ComEd and PECO's green building initiatives. 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. Similarly, emissions reductions shown are just those associated with the volume of RECs beyond what was purchased the previous year based on percent of total consumption. There is no savings or payback associated with the purchase of RECs. This is counted as 2 actions implemented in 4.3a.

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**Initiative category & Initiative type**

Low-carbon energy consumption

Other, please specify

RPS Renewable Energy Obligations Depend on State Requirements

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

4,427,903

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

**Voluntary/Mandatory**

Mandatory

**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**

1-2 years

**Comment**

Exelon's Utilities purchase Renewable Energy Credits to add renewable electricity to that which they deliver to their customers per state Renewable Portfolio Standards (RPS). Approximately 3.8 million RECs were needed to satisfy Maryland's Renewable Portfolio Standard (RPS) requirements at BGE for 2021, ComEd received and retired approximately 2.5 million RECs from wind and solar renewable energy resources to meet the Illinois RPS requirements, and PECO retired more than 2.4 million RECs to satisfy PA requirements. PHI utilities will retire approximately 5.7 million RECs to meet RPS obligations in 2021. These RECs are procured on behalf of Exelon's customers in accordance with the state requirements. Emissions reductions are Scope 3 and support cleaner energy being used (or supported) by our customers. Estimated annual CO<sub>2</sub>e savings relate to the avoided emissions associated with these MWhs at the PJM residual emissions rate. 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 under 4.3a (one for each of our six utilities).

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**Initiative category & Initiative type**

Energy efficiency in buildings

Other, please specify

Customer Energy Efficiency Programs

**Estimated annual CO<sub>2</sub>e savings (metric tonnes CO<sub>2</sub>e)**

1,359,401

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)



**Voluntary/Mandatory**

Mandatory

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

443,000,000

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

**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 2021, 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 2021 MWh savings, and do not include rebates issued. Investments for achievement of these efforts is shared between the customer and the utility. 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) under 4.3a.

**C4.3c**

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



Method	Comment
<p>Other</p> <p>Internal GHG Program Targets</p>	<p>Each year Exelon sets an annual net GHG target for operational emissions - which is a milestone on the path to achieving our 2030 reduction goal. This is reported on quarterly to upper management, and annual performance towards this goal is reported annual to the public as part of our Corporate Sustainability Report. Exelon also monitors several other key metrics related to GHG emissions performance. These include customer abatement which are avoided emissions associated with our utility customer energy efficiency programs and RPS REC commitments; % line losses which is an indicator of the efficiency of our distribution system; and the emissions intensity of our merchant electric generation portfolio. These target help to keep the importance of GHG mitigation and the transition to a clean energy economy in discussion throughout Exelon and a regular part of how we do business.</p>
<p>Compliance with regulatory requirements/standards</p>	<p>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. In 2021, through a combination of new and prior-year investments, our Exelon utilities helped customers save over 22 million MWh of energy through the ComEd Smart Ideas® programs, PECO Energy Efficiency programs, BGE Smart Energy Savers Program® and PHI Home Energy Savings Program®. This equates to more than 8.7 million metric tons of CO2e emissions avoided, the equivalent energy use of over one million homes for one year or the carbon sequestered by 10.4 million acres of U.S. forest in one year. These programs enable customer savings through home energy audits, lighting discounts, appliance recycling, home improvement rebates, equipment upgrade incentives and innovative programs like smart thermostats and combined heat and power programs.</p>
<p>Dedicated budget for low-carbon product R&amp;D</p>	<p>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.</p>
<p>Partnering with governments on technology development</p>	<p>Exelon and its operating companies often collaborates with local, state and federal government entities to pilot new technologies and support the advancement of climate adaptation and GHG emissions reduction goals. As an example, Delmarva Power partnered with the City of Wilmington, Delaware on Wilmington 2028, a plan that envisions creating a “brighter, safer, cleaner and technologically-advanced city.” The work integrates community development opportunities,</p>



	<p>expands partnerships and uses smart city technology to create a safer, smarter, more sustainable and more connected community. The initial project with Delmarva Power focuses on LED smart streetlight conversions, smart sensor technologies and electrification opportunities. Phase One of ConnectWilmington included a pilot LED Streetlight conversion of 250 streetlights. Within the demonstration area Delmarva Power worked with the City of Wilmington to showcase three smart city sensors: traffic monitoring, gunshot detection and air quality monitoring sensors to understand priority issues for the city. In the future, Delmarva Power will expand work in the city to include expansion of the LED streetlight conversion, an indoor agriculture pilot, implementation of an electric bus and additional smart sensor and smart cities technologies.</p>
<p>Compliance with regulatory requirements/standards</p>	<p>Exelon maintains an ISO 14001 certified Environmental Management System to ensure that we maintain compliance with all state and federal regulatory requirements, to include those related to GHG emissions management, either through the EPA's Part 98 Mandatory GHG reporting program or a regional effort to reduce GHG emissions directly. One example of a regional compliance program is the Regional Greenhouse Gas Initiative (RGGI), which several states recently took steps to join or rejoin, including New Jersey, Virginia and Pennsylvania. We also support many eastern states' efforts to stand up the Transportation and Climate Initiative (TCI), which, when implemented, will employ a similar regional approach to reduce GHG emissions from transportation fuels.</p>
<p>Dedicated budget for low-carbon product R&amp;D</p>	<p>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 cultivates strategic partnerships with the external technology ecosystem, through our Partnership Research and Development (R&amp;D) Program framework. This program enables Exelon to directly engage with early-stage technology innovation by funding and collaborating on projects at leading research institutions, including Argonne National Laboratory, Massachusetts Institute of Technology (MIT), Northwestern University and the University of Illinois. We also partner with third parties such as Otherlab, an independent research and design firm. The Partnership R&amp;D Program screens dozens of technologies each year. Over the last five years, the program has invested in 28 transformative projects, supporting the co-creation of novel technologies in strategic areas such as electrification, DER enablement, grid flexibility and low-carbon fuels. Proactive ecosystem relationships also benefit Exelon through fresh insights in key science, technology and industry trends; workforce enrichment by challenging existing patterns of thinking within the company; and the creation of impactful solutions for technical and market challenges. These projects support our access to new markets and products; enhance customer value; contribute insights in key science, technology and industry trends; enable Exelon to obtain ownership of and access to valuable technical intellectual property; enhance our</p>



	workforce by challenging existing patterns of thinking within the company; and create solutions for technical and market challenges. One recent example relates to how Exelon has partnered with Prysmian Group to pilot Prysmian's E3X® Robot System that is designed to apply heat-dissipating coatings to existing power lines to enhance transmission efficiency and safety.
Employee engagement	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. We are also using our newly announced Path to Clean GHG reduction goal and long-term commitment to inspire and engage employees on the topic of decarbonization.
Other Community Engagement	<p>Exelon maintains a high involvement with the communities in which we work, and emphasized education on energy efficiency and the science of electricity. Our three new signature education programs focus on equity and opportunity for students in financial need:</p> <ul style="list-style-type: none"> <li>• Exelon Foundation STEM Leadership Academy Scholars provides full scholarships to a select group of summer Academy alumnae.</li> <li>• Exelon-HBCU Scholars provides scholarships up to \$25,000 per year for four years to select students from Exelon's markets who attend Historically Black Colleges and Universities.</li> <li>• Exelon Green Lab Program gives grants up to \$50,000 to high schools and nonprofits to modernize their STEM labs</li> </ul>

## C4.5

**(C4.5) Do you classify any of your existing goods and/or services as low-carbon products?**

Yes

### C4.5a

**(C4.5a) Provide details of your products and/or services that you classify as low-carbon products.**



**Level of aggregation**

Group of products or services

**Taxonomy used to classify product(s) or service(s) as low-carbon**

Other, please specify

Customer Energy Efficiency Programs

**Type of product(s) or service(s)**

Buildings construction and renovation

Other, please specify

A variety of customer energy efficiency offerings, including rebates, audits, and special rates to encourage improved energy management

**Description of product(s) or service(s)**

Each of the Exelon utilities offers hourly pricing or smart usage rewards programs so that customers can manage their costs and reduce load during peak times. These programs include remote management of residential air conditioning and water heaters, as well as hourly pricing options for those interested in avoiding use during high-demand, high-price times. These programs highlight the value of smart thermostats and smart meters, allowing customers to receive bill credits when their power is curtailed during peak times, achieve lower costs by planning use during off-peak times and avoid overloading the grid. Commercial and Industrial peak demand programs are also in use in several of our service territories, to help these customer groups take advantage of off-peak pricing when they can adjust their business cycles to avoid peak demand times. Behavioral programs that alert customers to atypical or high-use situations also remind them to be aware of their energy use and take advantage of the available peak demand programs. In 2021, through a combination of new and prior-year investments, our Exelon utilities helped customers save over 22 million MWh of energy equal to more than 8.7 million mtCO<sub>2</sub>e emissions avoided. These programs enable customer savings through home energy audits, lighting discounts, appliance recycling, home improvement rebates, equipment upgrade incentives and innovative programs like smart thermostats and combined heat and power programs.

**Have you estimated the avoided emissions of this low-carbon product(s) or service(s)**

Yes

**Methodology used to calculate avoided emissions**

Estimating and Reporting the Comparative Emissions Impacts of Products (WRI)

**Life cycle stage(s) covered for the low-carbon product(s) or services(s)**



Use stage

**Functional unit used**

MWh reduced

**Reference product/service or baseline scenario used**

Regional Electric supply grid emissions rate in lbs/MWh

**Life cycle stage(s) covered for the reference product/service or baseline scenario**

Use stage

**Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario**

8,747,226

**Explain your calculation of avoided emissions, including any assumptions**

Customer abatement refers to customer programs that result in reduced GHG emissions associated with customers' use of electricity. These include the BGE Smart Energy Savers Program®, ComEd and PECO Smart Ideas programs and the PHI Home Energy Savings program. All these programs help our customers reduce their electricity use through energy efficiency measures in conformance with state-mandated requirements. The customer energy efficiency estimates for GHG abatement are based on the MWh reported to the Energy Smart Savers in Maryland for BGE, to the Illinois Commerce Commission by ComEd, to the Pennsylvania Public Utility Commission by PECO and to the regulatory commissions associated with the PHI utilities. In 2021, through a combination of new and prior-year investments, our Exelon utilities helped customers save over 22 million MWh of energy through the ComEd Smart Ideas® programs, PECO Energy Efficiency programs, BGE Smart Energy Savers Program® and PHI Home Energy Savings Program®. This equates to more than 8.7 million metric tons of CO2e emissions avoided, the equivalent energy use of over one million homes for one year or the carbon sequestered by 10.4 million acres of U.S. forest in one year. When estimating emissions avoided by these efforts, Exelon is using the PJM system mix average (lb/MWh) for the program year being reported. These are the emissions that may have been generated but for rebates and incentives of these programs. As customers may simultaneously add new electric uses, we do not always see these energy efficiency efforts as direct reductions to our Scope 3 emissions. Percent of revenue is currently not available for these programs.

**Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year**



## C-EU4.6

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

Three of Exelon's utilities — PECO, BGE and DPL — provide natural gas distribution service to customers through over 16,500 miles of gas mains. In 2021, 189.5 billion cubic feet of natural gas was delivered to customers by Exelon's gas utilities, providing fuel for heating, cooking and manufacturing processes. 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. As Exelon recognizes the importance of gas delivery systems in a reliable and resilient integrated energy system of the future, we are working to modernize these systems to increase safety, reduce methane leakage and ready these systems to be a part of the decarbonization solution by carrying increasing amounts of low emissions fuels like renewable natural gas and hydrogen. This has been an ongoing effort and Exelon's capital plans call for about \$3.7 billion of capital investment in our utilities' natural gas systems over the next four years. DPL has already replaced most of its cast iron and unprotected steel mains. From a safety perspective, Exelon uses optical methane detectors, remote methane leak detectors and combustible gas indicators to conduct periodic leak surveys. Identified leaks are prioritized for repair based on risk and in conformance with, or faster than, industry standards and regulatory requirements. BGE and PECO both maintain long-term pipe replacement programs aimed at eliminating all cast iron and unprotected steel pipes and services by no later than 2037. Since 2015, our pipe replacement programs have reduced methane emissions by over 100,000 metric tons of carbon dioxide equivalents (CO<sub>2</sub>e), and our emissions per weather-corrected throughput has declined from 0.44 percent to 0.34 percent. In 2022, BGE will be launching its first biogas injection pilot working with a food waste processing plant to begin blending renewable natural gas into their natural gas distribution system.

## C5. Emissions methodology

### C5.1

#### **(C5.1) Is this your first year of reporting emissions data to CDP?**

No

## C5.1a

**(C5.1a) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?**

### Row 1

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**Has there been a structural change?**

Yes, other structural change, please specify

Exelon separated its utilities and its competitive power generation and customer-facing retail energy businesses into two publicly traded companies

**Name of organization(s) acquired, divested from, or merged with**

The competitive power generation and customer-facing retail energy businesses that were split off from Exelon are now known as Constellation Energy (NASDAQ: CEG).

**Details of structural change(s), including completion dates**

On February 21, 2021, Exelon's Board of Directors approved a plan to separate Exelon's utilities and its competitive power generation and customer-facing energy businesses into two publicly traded companies with the resources necessary to best serve customers and sustain long-term investment and operational excellence. After receiving the necessary regulatory approvals, and approval from Exelon's Board of Directors, the separation was completed on February 1, 2022, with the utilities business retaining the Exelon name. The competitive power and customer-facing energy businesses company now trades as Constellation Energy (NASDAQ: CEG); more information is available on the Constellation website. Each independent company now has its own core business strategy and financial and strategic focus. Unless otherwise noted, this report presents information and data that reflects the footprint of the current day T&D utilities business of Exelon.

## C5.1b

**(C5.1b) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?**



	Change(s) in methodology, boundary, and/or reporting year definition?	Details of methodology, boundary, and/or reporting year definition change(s)
Row 1	Yes, a change in boundary	Our reporting boundary is now focused on the current day T&D utilities business of Exelon. Emissions reporting for the Constellation Energy now separately traded company will be filed with CDP separately starting with calendar year 2021.

### C5.1c

**(C5.1c) Have your organization’s base year emissions been recalculated as result of the changes or errors reported in C5.1a and C5.1b?**

	Base year recalculation	Base year emissions recalculation policy, including significance threshold
Row 1	Yes	Exelon's 2015 base year was recalculated and re-verified to support reporting and goal tracking for the current day T&D utilities business of Exelon. All assets associated with its competitive power generation and customer-facing energy businesses that is now Constellation Energy can be found under their separately filed CDP survey.

### C5.2

**(C5.2) Provide your base year and base year emissions.**

**Scope 1**

**Base year start**

January 1, 2015

**Base year end**

December 31, 2015

**Base year emissions (metric tons CO2e)**



678,075

**Comment**

As re-verified in 2022 for to reflect the split off of the competitive power generation and customer-facing energy businesses that is now Constellation Energy. This revised and re-verified base year is now reflective of the current day T&D utilities business of Exelon based on equity-share.

**Scope 2 (location-based)**

---

**Base year start**

January 1, 2015

**Base year end**

December 31, 2015

**Base year emissions (metric tons CO2e)**

7,031,088

**Comment**

As re-verified in 2022 for to reflect the split off of the competitive power generation and customer-facing energy businesses that is now Constellation Energy. This revised and re-verified base year is now reflective of the current day T&D utilities business of Exelon based on equity-share.

**Scope 2 (market-based)**

---

**Base year start**

January 1, 2015

**Base year end**

December 31, 2015

**Base year emissions (metric tons CO2e)**

6,668,702



**Comment**

As re-verified in 2022 for to reflect the split off of the competitive power generation and customer-facing energy businesses that is now Constellation Energy. This revised and re-verified base year is now reflective of the current day T&D utilities business of Exelon based on equity-share.

**Scope 3 category 1: Purchased goods and services**

---

**Base year start**

January 1, 2021

**Base year end**

December 31, 2021

**Base year emissions (metric tons CO2e)**

682,825

**Comment**

This Scope 3 category was not accounted for in 2015.

**Scope 3 category 2: Capital goods**

---

**Base year start**

January 1, 2021

**Base year end**

December 31, 2021

**Base year emissions (metric tons CO2e)**

1,052,679

**Comment**

This Scope 3 category was not accounted for in 2015.



---

**Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)**

**Base year start**

January 1, 2015

**Base year end**

December 31, 2015

**Base year emissions (metric tons CO2e)**

78,602,072

**Comment**

This includes emissions related to all of the electricity that our utilities deliver. As Exelon does not own electric generation, all electricity they delivered is either purchased per the requirements of their public utility commissions or delivered for other competitive retail electricity retailers.

---

**Scope 3 category 4: Upstream transportation and distribution**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

The category is not currently relevant to Exelon's operations.

---

**Scope 3 category 5: Waste generated in operations**

**Base year start**

January 1, 2021



**Base year end**

December 31, 2021

**Base year emissions (metric tons CO2e)**

25,879

**Comment**

This Scope 3 category has not yet been able to be split for the 2015 calendar year when the company was combined.

**Scope 3 category 6: Business travel**

---

**Base year start**

January 1, 2021

**Base year end**

December 31, 2021

**Base year emissions (metric tons CO2e)**

2,221

**Comment**

This Scope 3 category has not yet been able to be split for the 2015 calendar year when the company was combined.

**Scope 3 category 7: Employee commuting**

---

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**



**Comment**

This Scope 3 category has not yet been calculated for the new company boundary.

**Scope 3 category 8: Upstream leased assets**

---

**Base year start**

January 1, 2021

**Base year end**

December 31, 2021

**Base year emissions (metric tons CO<sub>2</sub>e)**

8,926

**Comment**

These emissions relate to buildings leased by Exelon as offices. It should be noted that since we report under an equity-share boundary, these buildings are actually also captured in our regular Scope 1 & 2 accounting.

**Scope 3 category 9: Downstream transportation and distribution**

---

**Base year start**

**Base year end**

**Base year emissions (metric tons CO<sub>2</sub>e)**

**Comment**

The category is not currently applicable to Exelon's operations.

**Scope 3 category 10: Processing of sold products**

---





**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

The category is not currently applicable to Exelon's operations.

**Scope 3 category 11: Use of sold products**

---

**Base year start**

January 1, 2015

**Base year end**

December 31, 2015

**Base year emissions (metric tons CO2e)**

11,430,527

**Comment**

Based on its customers use of the natural gas delivered by DPL, BGE and PECO.

**Scope 3 category 12: End of life treatment of sold products**

---

**Base year start**

**Base year end**



**Base year emissions (metric tons CO2e)**

**Comment**

The category is not currently applicable to Exelon's operations.

**Scope 3 category 13: Downstream leased assets**

---

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

The category is not currently applicable to Exelon's operations.

**Scope 3 category 14: Franchises**

---

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

The category is not currently applicable to Exelon's operations.



**Scope 3 category 15: Investments**

---

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

The category is not considered relevant to Exelon's operations

**Scope 3: Other (upstream)**

---

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

The category is not applicable to Exelon's operations.

**Scope 3: Other (downstream)**

---

**Base year start**



**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

The category is not applicable to Exelon's operations.

## **C5.3**

**(C5.3) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

ISO 14064-1

The Climate Registry: Electric Power Sector (EPS) Protocol

The Climate Registry: General Reporting Protocol

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

The Greenhouse Gas Protocol: Scope 2 Guidance

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?**

**Reporting year**

---

**Gross global Scope 1 emissions (metric tons CO2e)**

466,716

**Comment**



This value is as verified under our new corporate boundary that focuses on the current day T&D utilities business that is Exelon. All 2021 emissions associated with the generation and retail sales business that is now Constellation Energy can be found in their separate CDP survey under that name.

## 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**

Equity Share Boundary; Scope 2 location-based uses thePJM ISO average emission factor for CO2 since all of our utilities are located in this region, employing the EPA eGRID sub-regional factors for CH4 and N2O from 2020 data set as issued in 1/2022; Scope 2 market-based use the PJM ISO residual factor for CO2, employing the EPA eGRID sub-regional factors from 2020 data set as issued in 1/2022 for CH4 and N2O. Scope 2 market-based also reflects Exelon purchases of Renewable Energy Certificates (RECs) for our own buildings.

## C6.3

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

### Reporting year

---

**Scope 2, location-based**

4,868,814

**Scope 2, market-based (if applicable)**



5,282,213

**Comment**

This value is as verified under our new corporate boundary that focuses on the current day T&D utilities business that is Exelon. All 2021 emissions associated with the generation and retail sales business that is now Constellation Energy can be found in their separate CDP survey under that name.

Much of the Scope 2 emissions for Exelon is related to transmission and distribution line losses not considered part of our Operations-driven emissions where we have direct control to drive reductions.

**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. Includes leak measurement from refrigerant units less than 50 lbs.

**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 would be extremely difficult to estimate and 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.

**Estimated percentage of total Scope 1+2 emissions this excluded source represents**

1

**Explain how you estimated the percentage of emissions this excluded source represents**

Percent would be less than 1 % but the data entry does not allow for that to be entered. By definition they are miniscule sources

## C6.5

**(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.**

### **Purchased goods and services**

---

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

682,825

**Emissions calculation methodology**

Spend-based method

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

0



**Please explain**

Exelon has just started calculating this category and has begun to meet with its highest impact suppliers to discuss their more specific emissions profiles.

**Capital goods**

---

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

1,052,679

**Emissions calculation methodology**

Spend-based method

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

0

**Please explain**

Exelon has just started calculating this category and has begun to meet with its highest impact suppliers to discuss their more specific emissions profiles.

**Fuel-and-energy-related activities (not included in Scope 1 or 2)**

---

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

74,658,788

**Emissions calculation methodology**

Average data method





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

0

**Please explain**

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). Since Exelon does not own any electric generation, our utilities deliver electricity that is either purchased per the public utility commissions requirements or delivered for other competitive electricity retailers. As a result we are only able to use the PJM grid average as the emissions rate for the supply of this electricity.

**Upstream transportation and distribution**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

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 at this time.

**Waste generated in operations**

---

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

25,879

**Emissions calculation methodology**

Supplier-specific method

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



75

**Please explain**

Exelon uses the new EPA EPA Wastewise WARM guidance. Performance will be measured off of a similar revised prior year's emissions. Due to delays associated with Covid-19, Exelon was not able to include the emissions associated with waste management in its annual third party verification process for calendar year 2020. Exelon does estimate some of the waste generation amounts in association with dumpsters that are only weighed periodically

**Business travel**

---

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

2,221

**Emissions calculation methodology**

Supplier-specific method

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

100

**Please explain**

Exelon uses the latest EPA GHG Emissions Factor Hub emissions factors for calculation of business travel emissions beyond those captured from our fleet vehicles and aircraft in our Scope 1 emissions. 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

**Please explain**



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.

### **Upstream leased assets**

---

#### **Evaluation status**

Relevant, calculated

#### **Emissions in reporting year (metric tons CO2e)**

8,926

#### **Emissions calculation methodology**

Hybrid method

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

90

#### **Please explain**

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. 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



**Emissions in reporting year (metric tons CO2e)**

0

**Emissions calculation methodology**

Other, please specify  
No such sources

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

100

**Please explain**

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. Exelon's emissions associated with transportation and distribution of our products is captured under our Scope 2 emissions associated with 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

**Emissions in reporting year (metric tons CO2e)**

0

**Emissions calculation methodology**

Other, please specify  
No such sources

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

100



**Please explain**

Exelon does not have having processing of sold products

**Use of sold products**

---

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

10,280,195

**Emissions calculation methodology**

Supplier-specific method

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

100

**Please explain**

These emissions are related to our customer's use of the natural gas delivered by Delmarva, PECO and BGE to customers (and accounted for as our customer's Scope 1 emissions). Data is as acquired from customer delivery meters.

**End of life treatment of sold products**

---

**Evaluation status**

Not relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

0

**Emissions calculation methodology**

Other, please specify  
No such sources



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

100

**Please explain**

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, calculated

**Emissions in reporting year (metric tons CO2e)**

0

**Emissions calculation methodology**

Other, please specify

No such sources

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

100

**Please explain**

Exelon does not have this source category as part of its current operations

**Franchises**

---

**Evaluation status**

Not relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

0

**Emissions calculation methodology**



Other, please specify  
No such sources

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

100

**Please explain**

Exelon does not have this source category as part of its current operations

**Investments**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

At this time, Exelon's primarily business is as an energy holding company with operations associated with electric and gas distribution. 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**

Not relevant, explanation provided

**Please explain**

Exelon does not have this source category as part of its current operations

**Other (downstream)**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**



Exelon does not have this source category as part of its current operations

## C6.7

**(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?**

Yes

### C6.7a

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

	CO2 emissions from biogenic carbon (metric tons CO2)	Comment
Row 1	8,160	This is direct emissions related to bio-fuels used in our vehicle fleets for fueling. Exelon also had 81 mt of biogenic CO2 associated with associated with indirect district heating from a trash to steam facility in its Scope 2 location-based accounting; and 41,003 mt CO2 associated with RECs purchased from a landfill gas project in its Scope 2 market-based accounting.

## 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.**

**Intensity figure**

0.000320489

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

5,748,929





**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

17,938,000,000

**Scope 2 figure used**

Market-based

**% change from previous year**

18.4

**Direction of change**

Decreased

**Reason for change**

Exelon saw a 18.4% reduction in this metric since total gross market-based emissions went down more significantly than did total revenues in association with its business split and restructuring. It should be noted that our intensity rate is extremely low for our industry to start with, but with the removal of the electric generation business that did have some fossil generation, it nearly cut our emissions by half, while our revenues were not cut but that same significance. In 2021, 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 SF6 management efforts; however our Scope 2 emissions, especially those associate with electric distribution system line losses increased as a result of increasing electric grid rates in our region. This is despite our efforts to invest in our distribution system infrastructure to improve efficiency and resiliency which also has the potential to reduce GHG emissions associated with line losses (such as voltage conservation reduction projects). Nevertheless overall the ultimate performance shows that the restructuring of our company has positioned us for success in a low carbon economy by reducing our emissions per revenue.



## 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).**

Greenhouse gas	Scope 1 emissions (metric tons of CO2e)	GWP Reference
CO2	118,299	IPCC Fourth Assessment Report (AR4 - 100 year) D <sub>1</sub>
CH4	304,843	IPCC Fourth Assessment Report (AR4 - 100 year) D <sub>2</sub>
N2O	482	IPCC Fourth Assessment Report (AR4 - 100 year) D <sub>3</sub>
HFCs	188	IPCC Fourth Assessment Report (AR4 - 100 year) D <sub>4</sub>
PFCs	0	IPCC Fourth Assessment Report (AR4 - 100 year) D <sub>5</sub>
SF6	42,904	IPCC Fourth Assessment Report (AR4 - 100 year) D <sub>6</sub>



<sup>1</sup>This is in alignment with the EPA Mandatory Reporting Rule 40 CFR Part 98

<sup>2</sup>This is in alignment with the EPA Mandatory Reporting Rule 40 CFR Part 98

<sup>3</sup>This is in alignment with the EPA Mandatory Reporting Rule 40 CFR Part 98

<sup>4</sup>This is in alignment with the EPA Mandatory Reporting Rule 40 CFR Part 98

<sup>5</sup>This is in alignment with the EPA Mandatory Reporting Rule 40 CFR Part 98

<sup>6</sup>This is in alignment with the EPA Mandatory Reporting Rule 40 CFR Part 98

### 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.**

	Gross Scope 1 CO2 emissions (metric tons CO2)	Gross Scope 1 methane emissions (metric tons CH4)	Gross Scope 1 SF6 emissions (metric tons SF6)	Total gross Scope 1 emissions (metric tons CO2e)	Comment
Fugitives	380	12,191	1.882	348,246	This includes fugitive emissions from SF6 equipment and natural gas distribution systems, as well as refrigerants
Combustion (Electric utilities)	0	0	0	0	Exelon no longer owns any electric generation and is a distribution utility only
Combustion (Gas utilities)	10,909	0.21	0	10,920	This includes combustion emissions associated with our natural gas distribution system including preheaters and peaking plant equipment
Combustion (Other)	107,008	2.63	0	107,550	This captures combustion for fuels associated with our fleet vehicles, as well as building heat and emergency back up



Emissions not elsewhere classified	0	0	0	0	Not applicable
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## C7.2

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

Country/Region	Scope 1 emissions (metric tons CO2e)
United States of America	466,716

## 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.**

Business division	Scope 1 emissions (metric ton CO2e)
BGE - Baltimore Gas & 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.	207,720
BSC - Exelon Business Services is our corporate operations that support the other companies. GHG emissions are primarily associated commercial building space and corporate transportation.	6,045
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.	38,974



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.	152,039
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 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.	61,938

**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.**

	Gross Scope 1 emissions, metric tons CO2e	Comment
Electric utility activities	119,432	These are the emissions associated with our electric distribution system including SF6 leakage, fleet vehicles and buildings and emergency equipment that support this part of our business. Where we have electric and gas utilities combined, these emissions from fleet vehicles and buildings have been split. It does not include our natural gas distribution methane leakage, natural gas combustion, or the buildings and fleet vehicles associated with gas operations.

**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.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	1,280	Decreased	0.02	Due to 'increased renewable energy consumption' implemented during the year, we were able to avoid fossil emissions from dispatch that could have been needed to satisfy grid demand. In 2021, Exelon purchased over 100,000 MWh of renewable energy credits, which is 1% more based on the total MWh used in our buildings. We used the % of electric used since we had a big change in our portfolio with the company split discussed under divestitures. This resulted in 3,348 additional RECs (equivalent to 1,280 mtCO2e at the PJM average emissions rate) used to reduced our market-based inventory as a result in expanded purchases of Renewable energy credits to cover the power that we consume. Our total Scope 1 and Scope 2 emissions in the previous year was 12,970,147 metric tons CO2e, therefore we arrived at -0.02% through $(-1280/12907147) * 100 = -0.02\%$ (i.e. a 0.02% decrease in emissions).
Other emissions reduction activities	223,554	Decreased	1.72	Due to 'other emissions reduction activities' implemented during the year, Exelon reduced its emissions 223,554 mtCO2e. Emissions reduction activities include building energy efficiency improvements; the retirement of three fossil fuel electric generation peaking plants, fleet vehicle electrification, biofuel blend increases and fuel efficiency / electrification improvements in our vehicle fleet; natural gas distribution system modernization; replacement of first generation breakers to reduce SF6 use; and implementation of voltage optimization/conservation voltage reduction in our utility



				systems. Using 223,554 metric tons of CO2e reduced in 2021 by our emissions reduction projects, and our total Scope 1 and Scope 2 emissions in the previous year was 12,970,147 metric tons CO2e, therefore we arrived at -1.72% through $(-223,554/12,970,147) * 100 = -1.72\%$ (i.e. a 1.72% decrease in emissions). It should be noted that as compared to our new corporate boundary, these emissions reduction activities represent 3.9% of our inventory.
Divestment	7,542,612	Decreased	58.15	In 2021, Exelon announced that it would be splitting its company and that the wholesale generation and competitive energy retailer would become a new entity Constellation Energy. This division occurred in February 2022 and thus in the submittal we are reporting on the Exelon company as it remains today. Using 7,542,612 metric tons of CO2e being related to the Constellation Energy company that was split off and our total Scope 1 and Scope 2 emissions in the previous year was 12,970,147 metric tons CO2e, therefore we arrived at -58.15% through $(-7,542,612/12,970,147) * 100 = -58.15\%$ (i.e. a 58.15% decrease in emissions). The 2021 information relating to Constellation Energy can be found under their CDP Climate Change Survey response.
Acquisitions	0	No change		No Acquisitions
Mergers	0	No change		No mergers
Change in output	145,221	Increased	1.12	This is associated with increased MWh of customer demand which drives the amount of transmission and distribution line losses we experience, which because of our distribution only business model is categorized as Scope 2 emissions. Using 145,221 metric tons of CO2e being related to the increase in MWh lost in 2021 and our total Scope 1 and Scope 2 emissions in the previous year was 12,970,147 metric tons CO2e, therefore we arrived at 1.12% through $(145,221/12,970,147) * 100 = 1.12\%$ (i.e. a 0.06% increase in emissions). Customer demand fluctuates every year due to changes in customer activity. Exelon's utilities do have award winning customer energy efficiency programs that drive to minimize customer use as possible, but as



				new electric uses like electric vehicles, get adopted customer demand can ultimately go up.
Change in methodology	78,756	Increased	0.61	Exelon revised it means of capturing the MWh associated with its line losses to align directly with its FREC Form 1 reporting, and adjusted our process to use the reporting year PJM factors since they are now consistently available prior to our verification. Using 78,756 metric tons of CO2e being related to this methodology change in 2021 and our total Scope 1 and Scope 2 emissions in the previous year was 12,970,147 metric tons CO2e, therefore we arrived at 0.61% through $(78756/12,970,147) * 100 = 0.61\%$ (i.e. a 0.61% increase in emissions).
Change in boundary	0	No change	0	There was no change in boundary for our utilities. The boundary associated with the Constellation Energy split which was divested has been captured above under divestitures.
Change in physical operating conditions	322,252	Increased	2.48	This is associated with the increase in the PJM residual emissions rate from 2020 to 2021 that would be reflective of the emissions rate for the electric supply that we deliver. Because of our business model and the regulations under which our utilities operate, we current do not own any generation and must buy lowest cost electricity from the market and deliver electricity as provided for competitive retailers. Therefore we must use the PJM residual emissions rate when calculating emissions from electric system losses, and unfortunately have no control over that emissions rate as it is market supplied. Exelon does continue to advocate for meaningful regulation to drive cost effective decarbonization of the electric grid supply. Using 322,252 metric tons of CO2e being related to the increase in MWh lost in 2021 and our total Scope 1 and Scope 2 emissions in the previous year was 12,970,147 metric tons CO2e, therefore we arrived at 2.48% through $(322,252/12,970,147) * 100 = 2.48\%$ (i.e. a 2.48% increase in emissions).
Unidentified	0	No change	0	Not applicable
Other	0	No change	0	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 35% but less than or equal to 40%

### C8.2

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

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	Yes
Consumption of purchased or acquired cooling	Yes
Generation of electricity, heat, steam, or cooling	No

### C8.2a

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



	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	HHV (higher heating value)	55,738	488,531	544,269
Consumption of purchased or acquired electricity		100,018	12,523,340	12,623,358
Consumption of purchased or acquired steam		45	152	197
Consumption of purchased or acquired cooling		0	480	480
Total energy consumption		155,801	13,012,504	13,168,305

## C8.2b

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

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	No
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	No

## C8.2c

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



### Sustainable biomass

---

**Heating value**

HHV

**Total fuel MWh consumed by the organization**

0

**Comment**

We currently do not have certifications for our purchased biofuels, but will pursue that in the future

### Other biomass

---

**Heating value**

HHV

**Total fuel MWh consumed by the organization**

55,738

**Comment**

Ethanol and Biodiesel used to fuel fleet vehicles. We currently do not have certifications for our purchased biofuels, but will pursue that in the future

### Other renewable fuels (e.g. renewable hydrogen)

---

**Heating value**

HHV

**Total fuel MWh consumed by the organization**

0

**Comment**

None used yet



**Coal**

---

**Heating value**

HHV

**Total fuel MWh consumed by the organization**

0

**Comment**

None Used

**Oil**

---

**Heating value**

HHV

**Total fuel MWh consumed by the organization**

11,225

**Comment**

Use in emergency generators

**Gas**

---

**Heating value**

HHV

**Total fuel MWh consumed by the organization**

112,685

**Comment**

Use for building heat and consumption for auxiliary combustion equipment use to support our natural gas distribution system.



**Other non-renewable fuels (e.g. non-renewable hydrogen)**

---

**Heating value**

HHV

**Total fuel MWh consumed by the organization**

364,621

**Comment**

Gasoline and Diesel fuel used to fuel fleet vehicles

**Total fuel**

---

**Heating value**

HHV

**Total fuel MWh consumed by the organization**

544,269

**Comment**

Includes all fuel combustion for building heat, natural gas distribution system operations, emergency generators and fleet vehicles

**C8.2g**

**(C8.2g) Provide a breakdown of your non-fuel energy consumption by country.**

---

**Country/area**

United States of America

**Consumption of electricity (MWh)**

12,623,358



**Consumption of heat, steam, and cooling (MWh)**

677

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

12,624,035

**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.**

---

**Country/Region**

United States of America

**Voltage level**

Distribution (low voltage)

**Annual load (GWh)**

180,506

**Annual energy losses (% of annual load)**

6.9

**Scope where emissions from energy losses are accounted for**

Scope 2 (market-based)



**Emissions from energy losses (metric tons CO2e)**

5,210,714

**Length of network (km)**

261,630

**Number of connections**

10,507,766

**Area covered (km2)**

63,843

**Comment**

This includes the information of all Exelon Utilities combined as reported in the 2021 10-K. Exelon's utilities do own a small amount of high voltage electric transmission lines (17,947 km total across all utilities, less than 7% of total circuit miles), which is included in this reporting summary. Number of connections shown is the number of electric customers served by our combined utilities in 2021. The percent line loss is the weighted average of the rates for each utility, and is based on annual accounting losses as reported in each of our utilities' FERC Form 1 reporting for 2021. Market-based emissions are based on the PJM 2021 Residual Emissions Rate. Note that emissions associated with line losses are categorized as Scope 2 for Exelon since we do not own electric generation and purchase or acquire all electricity that we deliver from grid supply.

## **C9. Additional metrics**

### **C9.1**

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



## C-EU9.5a

**(C-EU9.5a) Break down, by source, your organization's CAPEX in the reporting year and CAPEX planned over the next 5 years.**

### Coal – hard

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

### Lignite

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**





0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

**Oil**

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

**Gas**

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0



**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

**Sustainable biomass**

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

**Other biomass**

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**



0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

**Waste (non-biomass)**

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

**Nuclear**

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0



**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

#### **Geothermal**

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

#### **Hydropower**

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**



0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

## Wind

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

## Solar

---



**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

## Marine

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7



**Fossil-fuel plants fitted with CCS**

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

**Other renewable (e.g. renewable hydrogen)**

---

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**



Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

**Other non-renewable (e.g. non-renewable hydrogen)**

**CAPEX in the reporting year for power generation from this source (unit currency as selected in C0.4)**

0

**CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**Explain your CAPEX calculations, including any assumptions**

Not applicable to Exelon under its new business structure as we are only a distribution utility and do not own electric generation. See response in C-EU0.7

**C-EU9.5b**

**(C-EU9.5b) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).**

Products and services	Description of product/service	CAPEX planned for product/service	Percentage of total CAPEX planned products and services	End of year CAPEX plan
Other, please specify includes all infrastructure investments combined	Exelon invested more than \$6.6 billion across our regulated utilities in 2021 and	29,000,000,000	100	2025





<p>across Exelon Utilities' BGE, ComEd, PECO, ACE, DPL and PEPCO</p>	<p>plans to invest almost \$29 billion from 2022 through 2025. A smart grid is a modern electrical system that uses automated data collection, two-way communications and technology to deliver energy more reliably and efficiently. It provides data on hourly energy usage for customers and allows utilities to control and monitor the power system at a much more granular level than was previously possible. By investing in a smarter grid, we enable an electric system that is reliable, resilient, responsive, efficient and secure. Our customers benefit through instant access to energy information, faster outage detection and response, enhanced reliability, greater energy efficiency and increased involvement in the energy system. Smart meters are foundational to a smarter power grid as they enable customers to better understand real time energy usage in homes and businesses, in addition to providing Exelon's utilities with enhanced information to make our systems more efficient and resilient. Exelon has an installed base of more than 8.86 million electric smart meters and 1.37 million advanced gas meters. 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 use other means to enable renewable energy investment and deployment in our service territories by third parties. For example, we are deploying smart meter technology to integrate local generation and making other physical grid improvements. Through net metering, utilities purchase excess electricity produced from residential and commercial customers' renewable energy equipment. At year-end of 2021, Exelon utilities had a total of 173,284 customers with 2,660 megawatts (MW) of renewable energy generation resources installed, primarily solar photovoltaic systems, with a limited amount</p>			
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	of wind and other resources. These investments also support smart grid and battery pilots, as well as infrastructure to support beneficial electrification such as electric vehicle charging.			
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**C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6**

**(C-CE9.6/C-CG9.6/C-CH9.6/C-CN9.6/C-CO9.6/C-EU9.6/C-MM9.6/C-OG9.6/C-RE9.6/C-ST9.6/C-TO9.6/C-TS9.6) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?**

	Investment in low-carbon R&D	Comment
Row 1	Yes	Note that large scale commercial deployment activities are not typically categorized within Exelon’s R&D portfolio, but are mentioned here to respond to the spirit of the question categories and reflect the scale of Exelon’s investments in these technologies. We responded with a focus on our Research, Development & Deployment efforts.

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

**(C-CO9.6a/C-EU9.6a/C-OG9.6a) Provide details of your organization's investments in low-carbon R&D for your sector activities over the last three years.**

Technology area	Stage of development in the reporting year	Average % of total R&D investment over the last 3 years	R&D investment figure in the reporting year (optional)	Comment
Other, please specify Creating a smarter power grid	Large scale commercial deployment	81-100%		Exelon invests in a smarter grid to enable an electric system that is reliable, resilient, responsive, efficient and secure.  Exelon’s utilities have upgraded over 10.2 million smart electric and gas meters over the last 10 years across the Exelon utilities,



				<p>enabling a wide range of system and customer benefits. These new meters allow the utilities to remotely connect or disconnect service, provide enhanced information to help respond to power outages and better monitor circuit voltage, saving customers money and avoiding excess GHG emissions. Customers require fewer service calls when smart meters and remote sensing can diagnose problems. This technology helped us avoid more than one million truck rolls during 2021. At the same time, these technologies give customers real-time insights into their energy usage and opportunities to save energy. We have also deployed smart meter technology to integrate local generation into the energy system and we continue to make other physical grid improvements. Exelon's utilities enabled more than 173,000 customers to connect almost 2,700 MW of local renewable generation to the emerging smart grid. In the last five years Exelon's utilities have installed over 7,000 distribution automation devices, smart electronic switches that protect customers from electric service interruptions or automatically rearrange circuits to restore power quickly. In 2021 alone, these devices protected nearly 5 million customers from having an outage or restored power automatically, normally within one minute.</p> <p>(Note that large scale commercial deployment activities are not typically categorized within Exelon's R&amp;D portfolio, but are mentioned here to respond to the spirit of the question categories and reflect the scale of Exelon's investments in these technologies.)</p>
<p>Distributed energy resources</p>	<p>Full/commercial-scale demonstration</p>	<p>≤20%</p>		<p>Exelon is engaged in multiple energy storage pilot projects. One example is the VPP pilot project described below.</p> <p>The Elk Neck Battery Storage Pilot Program will install a network of</p>



				<p>residential battery storage systems that provide backup power for participating customers in case of a power outage and support the local energy grid during peak demand. Delmarva Power is working with Sunverge Energy, who will install 110 residential battery storage systems at homes in the Elk Neck, Md. at no charge to the customer.</p> <p>The residential batteries will improve resiliency for participating customers by providing an automatic backup energy source for the homes during power outages. Based on the configuration of the local energy grid and the unique geography of the area, Elk Neck customers are more vulnerable to power outages, making this an ideal location for the pilot program.</p> <p>The residential batteries will also be able to feed power into the local energy grid. Working with Sunverge, Delmarva Power will aggregate the residential battery systems to support the local energy grid when electricity demand on the system is high, generally during cold winter days and hot summer days.</p>
<p>Other, please specify Emerging Technologies</p>	<p>Applied research and development</p>	<p>≤20%</p>		<p>Exelon continuously engages with emerging technologies as part of a strategic focus on advancing a culture of technology and innovation. Multiple strategic programs at Exelon involve applied R&amp;D on emerging low-carbon technologies. Exelon cultivates strategic partnerships with the external technology ecosystem, through our Partnership Research and Development (R&amp;D) Program framework. This program enables Exelon to directly engage with early-stage technology innovation by funding and collaborating on projects at leading research institutions, including Argonne National Laboratory, Massachusetts Institute of</p>



				<p>Technology (MIT), Northwestern University and the University of Illinois. We also partner with third parties such as Otherlab, an independent research and design firm. The Partnership R&amp;D Program screens dozens of technologies each year. Over the last five years, the program has invested in 28 transformative projects, supporting the co-creation of novel technologies in strategic areas such as electrification, DER enablement, grid flexibility and low-carbon fuels. Proactive ecosystem relationships also benefit Exelon through fresh insights in key science, technology and industry trends; workforce enrichment by challenging existing patterns of thinking within the company; and the creation of impactful solutions for technical and market challenges.</p>
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## C10. Verification

### C10.1

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

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

### C10.1a

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

---

**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 CY2021 Assurance Statement-Scope 1 and Scope 2.pdf

**Page/ section reference**

whole document

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

**C10.1b**

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

---

**Scope 2 approach**



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 CY2021 Assurance Statement-Scope 1 and Scope 2.pdf

**Page/ section reference**

whole document

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

---

**Scope 2 approach**

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 CY2021 Assurance Statement-Scope 1 and Scope 2.pdf

**Page/ section reference**

whole document

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

## C10.1c

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

---

**Scope 3 category**

- Scope 3: Purchased goods and services
- Scope 3: Capital goods
- Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)
- Scope 3: Waste generated in operations
- Scope 3: Business travel
- Scope 3: Upstream leased assets





Scope 3: Use of sold products

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

 Exelon CY2021 Assurance Statement Scope 3 emissions.pdf

**Page/section reference**

whole document

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

**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?**

Yes



## C10.2a

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

Disclosure module verification relates to	Data verified	Verification standard	Please explain
C4. Targets and performance	Other, please specify Re-verification of 2015 base year	ISO14064-3	Following the split of the company, we re-verified our base year to establish the basis for our GHG emissions reduction goal  1

 1 Assurance Statement for Exelon Utilities Re-verification of 2015 Base Year.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)?**

No, and we do not anticipate being regulated in the next three years

### 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?**

No, and we do not currently anticipate doing so in the next two years



## C12. Engagement

### C12.1

**(C12.1) Do you engage with your value chain on climate-related issues?**

Yes, our suppliers

Yes, our customers/clients

Yes, other partners in the value chain

### C12.1a

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

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**Type of engagement**

Engagement & incentivization (changing supplier behavior)

**Details of engagement**

Run an engagement campaign to educate suppliers about climate change

Other, please specify

Include climate change in supplier selection / management mechanism. Climate change is integrated into supplier evaluation process

**% of suppliers by number**

100

**% total procurement spend (direct and indirect)**

100

**% of supplier-related Scope 3 emissions as reported in C6.5**

100



### **Rationale for the coverage of your engagement**

This applies to all Suppliers managed by our supply chain organization and relates to 100% of our Scope 3 emissions as reported in Section 6.5 under the Purchased goods and services and Capital Goods categories.

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 affected 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. Exelon continues to recommend supplier participation in the Alliance and the EUISSCA Supplier Affiliate Membership program.

### **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. Each year, the questionnaire is completed by over 2,000 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. In addition to meeting contract terms and conditions tailored to



manage each supplier’s engagement, all Exelon business partners, including our suppliers, were required to comply with Exelon’s Code of Business Conduct in 2021. Starting in 2022, Exelon implemented a new Supplier Code of Conduct that sets forth expectations for all suppliers, contractors and agents.

Exelon has continued to work with the Alliance to refine the company’s estimates for two categories of Scope 3 GHG emissions: “purchased goods and services” and “capital goods”. This year we are able to present emissions for the past three years using this refined methodology, and we are beginning supply engagement around GHG emissions based on the more Exelon-specific hot spot analysis. The calculation methodology developed by the EUISSCA translates money spent in this category into equivalent Scope 3 GHG emissions. Exelon intends to continue work with the Alliance to advance opportunities to quantify, understand and, where possible, seek to reduce supply chain GHG emissions. Exelon’s Chief Supply Officer continues to serve on the EUISSCA executive committee, continuing Exelon’s long-standing executive level support for the work of this organization.

**Comment**

No Comment

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**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**

1

**% total procurement spend (direct and indirect)**

36

**% of supplier-related Scope 3 emissions as reported in C6.5**

40



### **Rationale for the coverage of your engagement**

This applies to Tier 1 Suppliers managed by our supply chain organization and as emissions are currently calculated based on spend, it relates to approximately 40% (similar to spend) of our Scope 3 emissions as reported in Section 6.5 under the Purchased goods and services and Capital Goods categories.

Exelon employs a risk management process developed by our Supply and Enterprise Credit Risk Management team to identify, communicate and mitigate risks. Our semi-annual review of all suppliers determines supplier criticality to our business. This team conducts in-depth risk reviews of our critical suppliers. The team evaluates suppliers based on third-party credit reports, criticality of the supplier 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. The team regularly communicates the results of these risk reviews to management. In December 2021, Exelon conducted its semi-annual detailed risk assessment that identified 69 critical Tier 1 suppliers for its utilities. These Tier 1 suppliers represent 36 percent of total spend. As part of this process, we identified two high-risk critical Tier 1 suppliers and implemented risk mitigation strategies with these suppliers. Exelon actively works with all suppliers on a watchlist or performance improvement plan to implement corrective action strategies and remediate any performance issues.

### **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. Exelon actively works with all suppliers on a watchlist or performance improvement plan to implement corrective action strategies and remediate any performance issues, to include potential business continuity issues especially regarding critical equipment needed in system recovery.

Exelon sourcing professionals manage approximately 95 categories of supply spend. At a high level across our utilities in 2021, 37 percent of this spend is on services, 20 percent is on materials, 40 percent is on construction and 3 percent is on IT hardware and services. As a result of our work with the Electric Utility Industry Sustainable Supply Chain Alliance (EUISSCA) on the Scope 3 Hot Spot analysis – we have identified construction services as one our higher emitting supply categories and have initiated specific one on one engagements with these key suppliers to discuss GHG measurement, goals and potential partnerships to work through emission reduction barriers or support emission reduction opportunities relating to our projects with them as possible.

### **Comment**

No Comment



## C12.1b

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

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### **Type of engagement & Details of engagement**

Education/information sharing

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

### **% of customer - related Scope 3 emissions as reported in C6.5**

100

### **Please explain the rationale for selecting this group of customers and scope of engagement**

We take pride in providing our customers with world-class customer experiences, innovative program solutions, and tools to control energy usage, save money and reduce environmental impacts. As we work towards an equitable energy future, we are taking actions to harness the power of data to better understand and meet the needs of our residential, commercial and industrial customers. These programs enable customer savings through home energy audits, lighting discounts, appliance recycling, home improvement rebates, equipment upgrade incentives and innovative programs like smart thermostats and combined heat and power programs. This applies to all electric and gas customers at all six of our utilities through the ComEd Smart Ideas® programs, PECO Energy Efficiency programs, BGE Smart Energy Savers Program® and PHI Home Energy Savings Program® and 100% of the Scope 3 emissions for Fuel and Related Purchases (Customer Electric supply) and Use of Sold Products (natural gas customer use) emissions as reported in Section 6.5. Not that is equates to 98% of our total reported Scope 3 emissions).

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

In 2021, through a combination of new and prior-year investments, our Exelon utilities helped customers save over 22 million MWh of energy through the ComEd Smart Ideas® programs, PECO Energy Efficiency programs, BGE Smart Energy Savers Program® and PHI Home Energy Savings Program®. This equates to more than 8.7 million metric tons of CO<sub>2</sub>e emissions avoided, the equivalent energy use of over one million



homes for one year or the carbon sequestered by 10.4 million acres of U.S. forest in one year.

In 2021, Exelon utilities received numerous recognitions for our commitment to providing energy-saving products, programs and services to our customers.

BGE received the EPA ENERGY STAR® Partner of the Year — Sustained Excellence Award for the 11th consecutive year in 2021. BGE also received four American Marketing Association Marketing Excellence Awards for various campaigns, four silver and one bronze Telly Awards, and two American Advertising Awards (ADDY® Awards). BGE also received two Public Relations Society of America Awards for the BGE Fairy Tale Campaign and Connected Rewards Campaign, a Gold and Honorable mention dotCOMM Award, a National Capital Chesapeake Bay Chapter Award, and the Chartwell Best Practices Award — Bronze Program Marketing Award, for BGE's Connected Rewards Campaign. Lastly, BGE received the ENERGY STAR Residential New Construction Market Leader Award. ComEd received the ENERGY STAR Partner of the Year — Sustained Excellence Award. This is ComEd's ninth year in a row for the sustained excellence recognition and its 12th year of earning recognition in at least one award category. PECO received the 2021 ENERGY STAR Partner of the Year — Sustained Excellence recognition for the fourth year in a row for promoting a vast array of ENERGY STAR certified products to residential and commercial customers. Additionally, PECO received an ENERGY STAR New Construction Market Leader Award for its important contribution to energy-efficient construction. Pepco and DPL Maryland both received the ENERGY STAR Partner of the Year Award — Sustained Excellence, for the sixth and fifth years in a row, respectively. Additionally, DPL's Appliance Recycling Program was awarded the 2021 Responsible Appliance Disposal (RAD) Championship award by the U.S. EPA.

## C12.1d

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

Through regular engagement with our stakeholders and partners, we improve our understanding of emerging trends affecting our business and address stakeholder needs and concerns. We use stakeholder feedback to inform our sustainability strategy and business plans. Our operating companies also participate in dozens of stakeholder engagement activities related to specific local issues. Each year, we facilitate specialized forums with individual stakeholder groups to discuss their sustainability interests and concerns to inform our business and sustainability planning. For example, since 2008 we have engaged with Ceres, a non-profit organization advocating for sustainability leadership. Ceres provides an external perspective on key issues to help Exelon advance our sustainability performance. As a recent example of how this engagement informs our ESG strategy, Ceres convened a group of external stakeholders and Exelon participants in April 2021 to discuss the topic of Climate Justice, including environmental and health impacts, energy access, workforce transition, and community engagement and communication. Exelon appreciates the feedback received and it





is being used as we consider how to evolve our approaches to working with communities on climate change and other broader environmental and social issues that impact the communities that we serve, including our workforce development programs. In addition, we have appreciated direct engagement with Ceres staff over the last several years as Exelon developed our new Supplier Code of Conduct and continues to consider opportunities to enhance its sustainability performance. To explore avenues for improving sustainability performance as measured by the DJSI scorecard, we held discussions with S&P Global, an international investment company with a specific focus on sustainability investments, whose analysis forms the basis for DJSI scores. We also met with CDP on our disclosure results to better understand scoring and opportunities for improvement in the areas of climate change, water and supplier disclosures. Other engagement included our response to the Climate Action 100+ benchmark initiative and discussions with our lead Climate Action 100+ investors, California Public Employees' Retirement System (CalPERS) and the Unitarian Universalist Association.

## C12.2

### **(C12.2) Do your suppliers have to meet climate-related requirements as part of your organization's purchasing process?**

Yes, suppliers have to meet climate-related requirements, but they are not included in our supplier contracts

## C12.2a

### **(C12.2a) Provide details of the climate-related requirements that suppliers have to meet as part of your organization's purchasing process and the compliance mechanisms in place.**

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#### **Climate-related requirement**

Complying with regulatory requirements

#### **Description of this climate related requirement**

Suppliers must comply with all applicable laws and regulations governing the work they perform for Exelon. In addition, Exelon holds Suppliers to the same high standards of integrity and ethical conduct to which it holds itself and its employees. Supplier interactions with Exelon personnel must reflect honesty, integrity, and transparency. Suppliers must ensure required training of their workforce has been completed prior to starting any work for Exelon, and during the term of the contract between Exelon and the Supplier. Suppliers must also ensure that all employees supporting Exelon's operations are aware of the standards described in this Exelon Supplier Code of Conduct



**% suppliers by procurement spend that have to comply with this climate-related requirement**

100

**% suppliers by procurement spend in compliance with this climate-related requirement**

100

**Mechanisms for monitoring compliance with this climate-related requirement**

Supplier self-assessment

**Response to supplier non-compliance with this climate-related requirement**

Exclude

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**Climate-related requirement**

Implementation of emissions reduction initiatives

**Description of this climate related requirement**

Exelon's commitment to the environment is integral to meeting customers' expectations and reducing Exelon's environmental impact on future generations, while also ensuring that we meet or exceed all environmental laws and regulations. Exelon Utilities set a Path to Clean Goal for 50% GHG emissions reduction by 2030 and strives to achieve net-zero Operations by 2050. This includes a commitment to support customers and communities in reaching their clean energy and emissions reduction goals. We expect Suppliers to share these goals by identifying and implementing opportunities to reduce or eliminate energy usage, greenhouse gas emissions, waste and pollution at its source, and continually improving efficiency of resource and materials use

**% suppliers by procurement spend that have to comply with this climate-related requirement**

100

**% suppliers by procurement spend in compliance with this climate-related requirement**

100



**Mechanisms for monitoring compliance with this climate-related requirement**

Supplier self-assessment

**Response to supplier non-compliance with this climate-related requirement**

Other, please specify

We have identified construction services as one our higher emitting supply categories and have initiated specific one on one engagements with these key suppliers to discuss the status of their GHG emissions programs and reduction opportunities.

**C12.3**

**(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?**

**Row 1**

**Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate**

Yes, we engage directly with policy makers

Yes, we engage indirectly through trade associations

Yes, we engage indirectly by funding other organizations whose activities may influence policy, law, or regulation that may significantly impact the climate

**Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?**

Yes

**Attach commitment or position statement(s)**

In 2021, Exelon expanded and extended its GHG goal to a 50% reduction from a 2015 baseline by 2030 as an interim target to a goal of Net-Zero by 2050. This goal is in aligns with the ambitions of the Long-term Strategy of the United States which is in alignment with a science-based 1.5 degree ambition and the Paris Agreement.

 Path\_To\_Clean\_Overview.pdf



**Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy**

Exelon maintains a Federal Government and Regulatory Affairs and Public Policy and External Affairs teams to ensure that we stay up to date and involved in national regulatory and policy activities relating to clean energy and other climate change issues. Similarly, we have Operating Company Government and Regulatory specialists on the state and local levels, to do the same at the utility jurisdiction level. Exelon's Senior Vice President of Government and Regulatory Affairs and Public is responsible for the development and coordination of the Corporation's overall position on various policies that may affect our businesses. Her counterparts in Exelon's utilities work with executives across all operating companies to maintain alignment with more local issues.

Exelon's Federal Government and Regulatory Affairs and Public Policy Department also works closely with the Corporate Strategy, Innovation and Sustainability Department with regards to developments in industry trends and ongoing climate change analysis that may influence our public position or engagement efforts. Our Senior Vice President and Chief Strategy and Sustainability Officer is responsible for coordinating the Sustainability Council, where Government and Regulatory Affairs is represented, and whose function is to ensure that these issues are brought together with our broader business strategy in context with our Sustainability priorities including climate change. Policy coordination is also part of Exelon's strategic planning process, with our strategy periodically reviewed by the Exelon Executive Committee. 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, and well communicated to our stakeholders.

**C12.3a**

**(C12.3a) On what policy, law, or regulation that may impact the climate has your organization been engaging directly with policy makers in the reporting year?**

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**Focus of policy, law, or regulation that may impact the climate**

- Adaptation and/or resilience to climate change
- Electricity grid access for renewables



Other, please specify

Accelerating the buildout and connection of renewable and other clean energy resources, transportation electrification, increasing energy efficiency, resilience and workforce readiness

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

Bipartisan Infrastructure Investment and Jobs Act (IIJA): as it relates to accelerating the buildout and connection of renewable and other clean energy resources, transportation electrification, increasing energy efficiency, resilience and workforce readiness

**Policy, law, or regulation geographic coverage**

National

**Country/region the policy, law, or regulation applies to**

United States of America

**Your organization's position on the policy, law, or regulation**

Support with minor exceptions

**Description of engagement with policy makers**

Of the approximately \$550 billion in new spending included in the IIJA, about \$90 billion is tied to power infrastructure and clean or electric transportation. With the passage of this Act, Exelon began to engage with industry, legislators and the U.S. Department of Energy (DOE), the U.S. Department of Transportation, the National Telecommunications Information Agency and others on implementation. We have been working with various trade associations such as EEI, the American Gas Association (AGA), the Electric Drive Transportation Association, GridWise Alliance, the Alliance for Transportation Electrification and the Utility Broadband Alliance.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

Exelon was working actively engaged in aspects of the IIJA and develop comments related to the various grant programs funded by the IIJA. These include programs supporting transmission system build out and modernization, creation of hydrogen hubs, increasing distribution system resilience and automation, the expansion of the transportation electric charging and deployment of middle-mile and rural broadband.

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**

Adaptation and/or resilience to climate change

Electricity grid access for renewables

Other, please specify

Accelerating the buildout and connection of renewable and other clean energy resources, transportation electrification, increasing energy efficiency, resilience and workforce readiness

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

Congress' Build Back Better legislation: as it relates to accelerating the buildout and connection of renewable and other clean energy resources, transportation electrification, increasing energy efficiency, resilience and workforce readiness

**Policy, law, or regulation geographic coverage**

National

**Country/region the policy, law, or regulation applies to**

United States of America

**Your organization's position on the policy, law, or regulation**

Support with minor exceptions

**Description of engagement with policy makers**

Exelon has also supported Congress' Build Back Better legislation that included \$550 million in funding for clean energy and climate change investments. Exelon expects that the Biden Administration and federal agencies will continue to use their full authority to advance policies that drive further decarbonization across the U.S. economy and build resilience for the future, both through implementation of federal laws and the issuance of executive orders, such as the Justice40 and Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability orders that were issued in 2021.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

Exelon supports funding for clean energy and climate change investments.



**Have you evaluated whether your organization’s engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**

Low-carbon, non-renewable energy generation

Other, please specify

Clean energy generation

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

Clean Air Act: as it applies to challenges to potential regulation of GHG emissions from power plants.

**Policy, law, or regulation geographic coverage**

National

**Country/region the policy, law, or regulation applies to**

United States of America

**Your organization’s position on the policy, law, or regulation**

Support with no exceptions

**Description of engagement with policy makers**

Exelon is a member of the Clean Energy Group and a founding member of a coalition of power companies that have supported and argued before various federal courts in defense of the U.S. EPA’s authority under the Clean Air Act to regulate GHG emissions from power plants. A number of other parties have challenged that authority in the West Virginia vs. EPA case, which is pending before the U.S. Supreme Court at the time of this writing.

**Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation**

**Have you evaluated whether your organization’s engagement is aligned with the goals of the Paris Agreement?**



Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**

Electricity grid access for renewables

Other, please specify

Grid resilience and reliability

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

Advanced Notice of Proposed Rulemaking (ANOPR) on Building for the Future through Regional Transmission Planning and Cost Allocation and Generator Interconnection - FERC Order 1000 and 2222

**Policy, law, or regulation geographic coverage**

National

**Country/region the policy, law, or regulation applies to**

United States of America

**Your organization's position on the policy, law, or regulation**

Support with minor exceptions

**Description of engagement with policy makers**

We are engaged in several ongoing state, regional and federal regulatory efforts related to transmission planning. These proceedings affect modernization and expansion of our transmission infrastructure to integrate offshore wind and other new renewable generation. We are actively engaging at the Federal Regulatory Energy Commission (FERC) in response to its Advanced Notice of Proposed Rulemaking (ANOPR) on Building for the Future through Regional Transmission Planning and Cost Allocation and Generator Interconnection, both as Exelon and through the WIRES coalition. We also participated in the PJM stakeholder process to reform the generator interconnection queue.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

Exelon is supportive of competition in transmission where appropriate as well as of modifying existing elements of FERC Order 1000 to enable the more rapid buildout of needed transmission upgrades for reliability and generator interconnection purposes. Exelon is also working with





stakeholders on FERC Order 2222, which enables the participation of DER through aggregation into the wholesale electricity market. Order 2222 provides unique opportunities and challenges for the distribution system and its operators both for customers and for grid reliability. For example, distribution utilities will need new processes and tools to evaluate the reliability of the new registration applications from DER aggregators. In addition, aggregators and distribution utilities will need to design and implement new monitoring and control schemes to better manage the reliability of the grid as greater levels of aggregated DERs integrate into the grid. In the future, states and utilities will need to ensure that DER interconnection processes, rates and distribution system technology requirements anticipate participation in wholesale aggregations, which could change the operational profile of these systems.

**Have you evaluated whether your organization’s engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**

Other, please specify

Jurisdictional Level Policies to accelerate the deployment of clean energy technologies and combat climate change

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**

Jurisdictional Level Policies to accelerate the deployment of clean energy technologies and combat climate change

**Policy, law, or regulation geographic coverage**

Sub-national

**Country/region the policy, law, or regulation applies to**

United States of America

**Your organization’s position on the policy, law, or regulation**

Support with minor exceptions

**Description of engagement with policy makers**

At the state level, the convergence of energy and climate policy is occurring, with our six utilities operating in jurisdictions with leading policies to accelerate the deployment of clean energy technologies and combat climate change. For example, our jurisdictions have goals related to



decarbonization, advancing renewables and clean energy, transportation electrification, deploying distributed energy resources and energy efficiency. They also each provide opportunities for Exelon's utilities to make investments and recover costs through various forms of alternative ratemaking, including the use of multi-year plans and capital trackers. In addition, each jurisdiction is focused on making the transition to a lower carbon, more resilient future equitably, inclusively and with an intention to provide opportunities to local business and historically marginalized and under-resourced communities.

**Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation**

Regulatory planning and certainty over multiple years provides opportunities for more efficient procurement, enables hiring and longer-term contracting with our local, diverse suppliers, and allows us to attract capital at lower cost. It also provides transparency to our customers about what future energy costs will be and opportunities for all stakeholders to understand the investments we intend to make before making them. This forward-looking approach to regulation can take many forms. For example, Pepco and BGE have multi-year plans in effect for their jurisdictions, while ComEd will transition to a form of forward-looking ratemaking as a result of the Clean Energy Jobs Act. In Pennsylvania, PECO uses a fully projected future test year, while ACE and DPL have capital trackers that execute on an agreed-upon multi-year category of investments. This move toward multi-year rate mechanisms utilized in many states across the country will enable greater levels of transparency, certainty and engagement for us and our customers alike. As an essential energy service provider, we also have a duty to balance safe, reliable and affordable energy solutions for all customers while meeting our respective jurisdictional targets, and must consider aspects of reliability and affordability as part of clean energy transition planning.

**Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

**C12.3b**

**(C12.3b) Provide details of the trade associations your organization engages with which are likely to take a position on any policy, law or regulation that may impact the climate.**

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**Trade association**

Edison Electric Institute (EII)



**Is your organization's position on climate change consistent with theirs?**

Mixed

**Has your organization influenced, or is your organization attempting to influence their position?**

We have already influenced them to change their position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

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.

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. Also, in conjunction with EEI, we support efforts to better inform and evolve infrastructure standards for resilience to extreme events (including cyber, physical attacks and natural disasters). We also support the development of a common methodology for applying details of potential impacts to utility infrastructure planning given the uncertainty of future projections and potential scenarios and the need to balance cost of investment with public benefits achieved. See our public policy discussion for more information on our efforts with peer and industry groups and state and federal agencies. From July 2019 through June 2020, our CEO Chris Crane was the Chairman of EEI and established two strategic initiatives. The first focused on workforce development and the second on grid resilience and the value of proactive, resilience-based investment on behalf of our customers.

Exelon remains active in key industry trade associated to help it stay current on new regulations, technologies and initiative that ultimately drive the evolution of the industry. It also participates in working groups and special projects that support advancement of the industry while sharing costs across multiple peer companies.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**



**Describe the aim of your organization’s funding**

**Have you evaluated whether your organization’s engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify

American Gas Association

**Is your organization’s position on climate change consistent with theirs?**

Mixed

**Has your organization influenced, or is your organization attempting to influence their position?**

We have already influenced them to change their position

**State the trade association’s position on climate change, explain where your organization’s position differs, and how you are attempting to influence their position (if applicable)**

The American Gas Association is committed to reducing greenhouse gas emissions through smart innovation, new and modernized infrastructure, and advanced technologies that maintain reliable, resilient and affordable energy service choices for consumers. The association supports: 10 commitments to further reduce methane emissions from natural gas utility systems; and 8 principles for a national policy approach to reducing greenhouse gas emissions and addressing climate change.

AGA’s position on climate change is generally in line with Exelon’s views. As Exelon continues to work with our customers and communities to meet their clean energy and climate goals, we want to ensure decarbonization is achieved in a manner that is equitable, affordable, reliable, and meets the needs of our customers. With respect to natural gas, it is an affordable, reliable, and abundant energy source that we deliver to 1.35 million customers across Pennsylvania, Maryland, and Delaware. We see customers continuing to ask to connect to our gas systems, which provides reliability that customers value. We know natural gas has an emissions impact. We are actively working to explore and advance a



lower carbon future for our gas networks. Infrastructure modernization programs at BGE, PECO, and DPL are the foundation. But we are also exploring all the tools, including: energy efficiency, leak detection and cleaner fuel alternatives. We plan to test these tools this decade to put us on track to a low-carbon future. Similarly, we foresee the methane content and combustion emissions of the gas we deliver as declining over time through efficiencies and as alternative fuels are blended into the system.

Exelon remains active in key industry trade associated to help it stay current on new regulations, technologies and initiative that ultimately drive the evolution of the industry. It also participates in working groups and special projects that support advancement of the industry while sharing costs across multiple peer companies.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

## **C12.3c**

**(C12.3c) Provide details of the funding you provided to other organizations in the reporting year whose activities could influence policy, law, or regulation that may impact the climate.**

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**Type of organization**

Non-Governmental Organization (NGO) or charitable organization

**State the organization to which you provided funding**



Center for Climate and Energy Solutions

**Funding figure your organization provided to this organization in the reporting year (currency as selected in C0.4)**

**Describe the aim of this funding and how it could influence policy, law or regulation that may impact the climate**

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.

**Have you evaluated whether this funding is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

## 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).**

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**Publication**

In mainstream reports

**Status**

Complete

**Attach the document**

 2021 Exelon Form 10-K (Final).pdf

**Page/Section reference**



pg 19, 21-23, and other related financial elements under risks and results of operations.

**Content elements**

- Strategy
- Risks & opportunities
- Emissions figures
- Emission targets

**Comment**

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**Publication**

In voluntary sustainability report

**Status**

Complete

**Attach the document**

 EXL\_21\_CSR\_062522.pdf

**Page/Section reference**

pages 15-45; pages 64-90; pages 106-131 - note that the Climate Change section is laid out to align with TCFD

**Content elements**

- Governance
- Strategy
- Risks & opportunities
- Emissions figures
- Emission targets



Other metrics

Other, please specify

Details on GHG accounting and Supply Chain efforts

**Comment**


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**Publication**

In voluntary communications

**Status**

**Attach the document**

 Path\_To\_Clean\_Overview.pdf

**Page/Section reference**

Whole document - announces our new GHG 2030 emissions reduction goal and Net-Zero goal timeframe and how we hope to achieve it

**Content elements**

Emissions figures

Emission targets

**Comment**





## C15. Biodiversity

### C15.1

**(C15.1) Is there board-level oversight and/or executive management-level responsibility for biodiversity-related issues within your organization?**

	Board-level oversight and/or executive management-level responsibility for biodiversity-related issues	Description of oversight and objectives relating to biodiversity
Row 1	Yes, both board-level oversight and executive management-level responsibility	The Exelon Board’s Corporate Governance Committee oversees the company’s strategy and performance for addressing sustainability and environmental issues, including biodiversity. Our executive management team is supported by our new corporate Sustainability Council, established in early 2022 as an advisory body to oversee Exelon’s integrated ESG program and disclosures, including Exelon’s management of biodiversity. Our Senior Vice President and Chief Strategy and Sustainability Officer (CSO) is responsible for chairing the Sustainability Council and overseeing the establishment and maintenance of all sustainability efforts, including biodiversity, in coordination with our broader business strategy. Our operational footprint encompasses large tracts of land with diverse flora and fauna and borders a variety of waterbodies. Through our corporate Biodiversity and Habitat Policy, we reflect our commitment to protect wildlife and habitats. We work to improve our understanding of biodiversity through partnerships with experts and regulatory agencies. We collaborate on a variety of studies and provide educational opportunities for employees and community members through our Wildlife Habitat Council (WHC) and National Wildlife Federation (NWF) certified sites. We also embrace nature-based solutions to climate change. Across our 11,152 miles of electric utility transmission rights-of-way (ROWs) and other land holdings, every operating company is sustaining meaningful actions to mitigate the impacts of climate change on local species and native habitats.



## C15.2

**(C15.2) Has your organization made a public commitment and/or endorsed any initiatives related to biodiversity?**

	Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity	Initiatives endorsed
Row 1	Yes, we have endorsed initiatives only	Other, please specify Exelon has longstanding relationships with Wildlife Habitat Council (WHC) and National Wildlife Federation (NWF), with a total of 38 sites certified by WHC and 60 locations or programs having NWF habitat certifications.

## C15.3

**(C15.3) Does your organization assess the impact of its value chain on biodiversity?**

	Does your organization assess the impact of its value chain on biodiversity?
Row 1	No, and we do not plan to assess biodiversity-related impacts within the next two years

## C15.4

**(C15.4) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?**

	Have you taken any actions in the reporting period to progress your biodiversity-related commitments?	Type of action taken to progress biodiversity-related commitments
Row 1	Yes, we are taking actions to progress our biodiversity-related commitments	Land/water protection Land/water management Species management Education & awareness




## C15.5

**(C15.5) Does your organization use biodiversity indicators to monitor performance across its activities?**

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
Row 1	Yes, we use indicators	Response indicators

## C15.6

**(C15.6) Have you published information about your organization’s response to biodiversity-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

Report type	Content elements	Attach the document and indicate where in the document the relevant biodiversity information is located
In voluntary sustainability report or other voluntary communications	Content of biodiversity-related policies or commitments Impacts on biodiversity Details on biodiversity indicators Biodiversity strategy	See pages 82-87  1

 1EXL\_21\_CSR\_062522.pdf

## C16. 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.**



## C16.1

**(C16.1) Provide details for the person that has signed off (approved) your CDP climate change response.**

	<b>Job title</b>	<b>Corresponding job category</b>
Row 1	Senior Vice President and Chief Strategy and Sustainability Officer	Chief Sustainability Officer (CSO)