



March 10, 2000

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Dresden Nuclear Power Station, Units 1, 2 and 3
Facility Operating License Nos. DPR-2, DPR-19 and DPR-25
NRC Docket Nos. 50-10, 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Zion Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304

Subject: Additional Information Regarding Application for License Transfers
and Conforming Administrative License Amendments

Reference: Commonwealth Edison (ComEd) Company letter, "Application for
License Transfers and Conforming Administrative License
Amendments," dated December 20, 1999

This letter provides additional information supporting the projected income
statement for the new generating company contained in Enclosure 7P of the
Reference letter. This information was requested during a February 11, 2000,

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telephone conference call between representatives of ComEd, PECO Energy Company (PECO), and the NRC. Specifically, the enclosed information describes.

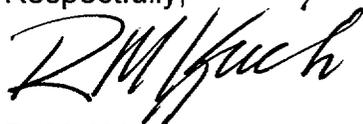
- Net generating capacity assumptions upon which the projected income statement is based;
- Assumptions regarding the acquisition of additional ownership interests in the Peach Bottom Atomic Power Station and Salem Generating Station; and
- Assumptions regarding revenues attributable to ownership of an interest in AmerGen Energy Company, LLC (AmerGen), including AmerGen's wholly-owned subsidiary, AmerGen Vermont, LLC.

We have also enclosed a revision to Enclosure 7P of the Reference letter. This revision is necessary to correct a transcription error concerning the "PECO - Nuclear Capacity Factor," reflected in Enclosure 7P. This error, however, did not affect the ultimate results of Enclosure 7P. An additional error was discovered in the nuclear capacities used to determine the generation revenues for the Mid-West Region. Revised generation revenues reflecting the corrected nuclear capacities are provided in the projected income statement.

This submittal includes proprietary information in Enclosure 2P and 7P. Because these enclosures contain confidential financial information, as described in the Affidavit of Robert E. Berdelle, provided in Enclosure 1, ComEd requests that this information be withheld from public disclosure pursuant to 10 CFR 2.790(a)(4), "Public Inspections, Exemptions, Requests for Withholding." Non-proprietary versions of these enclosures, suitable for public disclosure, are provided as Enclosures 2 and 7.

If you have any questions about this letter, please contact K. A. Ainger at (630) 663-7350.

Respectfully,



R. M. Krich
Vice President - Regulatory Services

Enclosures

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cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Braidwood Station
NRC Senior Resident Inspector – Byron Station
NRC Senior Resident Inspector – Dresden Nuclear Power Station
NRC Senior Resident Inspector – LaSalle County Station
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

Enclosure 1

10 CFR 2.790 Affidavit of Robert E. Berdelle

STATE OF ILLINOIS)	
COUNTY OF COOK)	
IN THE MATTER OF)	
COMMONWEALTH EDISON COMPANY)	Docket Numbers
Braidwood Station, Units 1 and 2)	STN 50-456 and STN 50-457
Byron Station, Units 1 and 2)	STN 50-454 and STN 50-455
Dresden Nuclear Power Station, Units 1, 2 and 3)	50-10, 50-237 and 50-249
LaSalle County Station, Units 1 and 2)	50-373 and 50-374
Quad Cities Nuclear Power Station, Units 1 and 2)	50-254 and 50-265
Zion Nuclear Power Station, Units 1 and 2)	50-295 and 50-304

SUBJECT: Request for Withholding of Information from Public Disclosure

10 CFR 2.790 AFFIDAVIT

I, Robert E. Berdelle, Vice President and Comptroller of Commonwealth Edison (ComEd) Company, do hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of ComEd.
2. ComEd is providing additional information in support of the proposed license transfers for NRC Docket Nos. STN 50-456, STN 50-457, STN 50-454, STN 50-455, 50-10, 50-237, 50-249, 50-373, 50-374, 50-254, 50-265, 50-295, and 50-304. The documents being provided in Enclosure 2P contain additional detailed information concerning ComEd's financial projections related to the continued operation of the above facilities within GENCO. These documents constitute proprietary financial information that should be held in confidence by the NRC pursuant to 10 CFR 2.790(a)(4) because:
 - i. This information is and has been held in confidence by ComEd.
 - ii. This information is of a type that is held in confidence by ComEd, and there is a rational basis for doing so because the information contains sensitive financial information concerning GENCO's projected revenues.

- iii. This information is being transmitted to the NRC in confidence.
 - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
 - v. Public disclosure of this information would create substantial harm to the competitive position of GENCO by disclosing GENCO's internal financial projections to other parties whose commercial interest may be adverse to those of GENCO.
3. Accordingly, ComEd requests that the designated document be withheld from public disclosure pursuant to the criteria reflected in 10 CFR 2.790(a)(4).

Robert E. Berdelle

Robert E. Berdelle
Vice President and Comptroller
Commonwealth Edison Company

Subscribed and sworn to before me, a Notary Public in and

for the State of Illinois, this 23rd day of

February, 2000.

Mary L. Kwilos

Notary Public



Enclosure 2

**Additional Information Related to the Projected
Income Statement and Opening Balance Sheet of
GENCO (Non-Proprietary Version)**

GENCO
Mid-Atlantic Region
Detail Assumptions

	2001	2002	2003	2004	2005
¹ Capacity (MW)					
Fossil Capacity					
Nuclear Capacity:					
Peach Bottom U2 (current PECO share - 42.49%)					
Peach Bottom U3 (current PECO share - 42.49%)					
Peach Bottom U2 (incremental PECO share to 50%)					
Peach Bottom U3 (incremental PECO share to 50%)					
Limerick U1					
Limerick U2					
Salem U1 (PECO share - 42.59%)					
Salem U2 (PECO share - 42.59%)					
Subtotal					
Total Capacity (MW)					
Average Capacity Factor					
Fossil					
Nuclear					
Generation (GWh)					
Fossil					
Nuclear					
Subtotal					
² Purchases from AmerGen:					
TMI					
Clinton					
VY					
NiMo					
Oyster Creek					
Subtotal					
Purchases from Other Suppliers					
Total Supply (GWh)					
Market Sales (GWh)					
Average Market Price (\$/MWh)					
Total Mid-Atlantic Region Generation Revenue (\$M)					

Notes for Mid-Atlantic Region

¹ Nuclear and Fossil Capacity

Station capacities shown are winter capabilities.

The incremental 7.51% ownership share in PBAPS is assumed effective in year 2000.

² Purchases from AmerGen

PECO's Wholesale Marketing Group (The Power Team) purchases the portion of plant output which is not under contract to previous owners. The Power team re-sells this energy and capacity into the open market. The average purchase price assumed is as follows:

<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>
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³ GENCO Income Statement, "Other Income (Deductions)"

A portion of the Income (Deduction) identified in this item is derived from PECO's percent ownership of AmerGen's net income. AmerGen is accounted for in PECO's financial statements using the Equity Method. Under this method, AmerGen's net income (in \$M) during the relevant time period is as follows:

	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>
TMI					
Clinton					
VY					
NiMo					
Oyster Ck					
Total					

GENCO
Mid-West Region
Detail Assumptions

	2001	2002	2003	2004	2005
¹ Capacity (MW)					
Nuclear Capacity:					
Braidwood U1					
Braidwood U2					
Byron U1					
Byron U2					
LaSalle U1					
LaSalle U2					
Dresden U2					
Dresden U3					
Quad Cities U1					
Quad Cities U2					
Total Capacity (MW)					
Average Capacity Factor					
Generation (GWh)					
Nuclear					
² Purchases from Other Suppliers					
Total Supply (GWh)					
Market Sales (GWh)					
Average Market Price (\$/MWh)					
Total Mid-West Region Generation Revenue (\$M)					

Notes for Mid-West Region

¹ Nuclear Capacity

Station capacities shown are winter capabilities including planned uprates.

The capacity for Midwest nuclear generation prior to uprates was 9,407 MW in December 1999.

Enclosure 7

Revised Projected Income Statement of GENCO
(Non-Proprietary Version)

GENCO
PROJECTED INCOME STATEMENT
(\$ Thousands)

	1	2	3	4	5
	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>
Operating Revenues					
Operating Expenses					
Purchased Power					
Fuel					
Operation & Maintenance					
Depreciation & Amortization					
Administrative & Other					
Decommissioning Expense					
Decommissioning Recoveries					
Total Operating Expenses					
Operating Income (Loss)					
³ Other Income (Deductions)					
Income before Income Taxes					
Income Taxes					
Net Income (Loss)					

GENCO
Key Assumptions

03/10/2000

Mid-Atlantic Region

Generation (GWh)	2001	2002	2003	2004	2005
Fossil					
Nuclear					
Subtotal					
Purchases from AmerGen Sales					
Purchases from Other Suppliers					
Total Supply (GWh)					
Market Sales (GWh)					
Average Market Price (\$/MWh)					

Mid-West Region

Generation (GWh)					
Nuclear					
Purchases from Other Suppliers					
Total Supply (GWh)					
Market Sales (GWh)					
Average Market Price (\$/MWh)					

Total Generation Revenue (\$ Thousands)

PECO - Nuclear Capacity Factor

Unicom - Nuclear Capacity Factor