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29 September 2016

VIA ELECTRONIC MAIL AND DELAFILE

Ms. Donna Nickerson
Commission Secretary
Delaware Public Service Commission
861 Silver Lake Blvd., Ste. 100
Dover, DE 19904

Re: *PSC Docket No. 14-193*

Dear Ms. Nickerson:

Attached please find Staff's Motion to Open the Record in the above-captioned matter to allow the Commission to consider Staff's Memorandum on the public interest issue discussed at the last Commission meeting. The Memorandum is being separately filed.

Staff respectfully requests that its Motion be placed on the Commission's October 6th meeting agenda for consideration. Thank you.

Very truly yours,



James McC. Geddes

Enclosure
JMcCG:nms
cc: Members of the Service List (via DelaFile; w/encl.)

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE APPLICATION OF)
DELMARVA POWER & LIGHT COMPANY,)
EXELON CORPORATION, PEPSCO HOLDINGS,) PSC DOCKET NO. 14-193
INC., PURPLE ACQUISITION CORPORATION,)
EXELON ENERGY DELIVERY COMPANY, LLC)
AND NEW SPECIAL PURPOSE ENTITY FOR)
APPROVALS UNDER THE PROVISIONS OF 26)
DEL.C. SECTIONS 215 AND 1016 (FILED JUNE 18.)
2014)

**MOTION OF COMMISSION STAFF TO OPEN THE RECORD FOR THE LIMITED
PURPOSE OF CONSIDERING STAFF’S MEMORANDUM ON PUBLIC INTEREST**

Commission Staff (“Staff”) by and through its undersigned counsel hereby moves the Commission to open the record in the caption proceeding for the limited purpose of accepting Staff’s Memorandum and comment dealing with the issue of public interest. Staff provides the following:

1. On September, 20 2016 the Commission held a hearing to consider the additional allocation of funds under the terms and conditions of the Most Favored Nation clause of the Amended Settlement Agreement approved by the Commission in Order No 8746 (June 2, 2015).

2. During the hearing, Staff’s proposed that a portion of the additional \$27.1 million of benefits, \$ 4 million (less than 6% of the total benefits attributed to the merger) be allocated to public interest projects. The Commission and some of the other parties questioned Staff’s proposed allocation to public interest projects. Staff requested an opportunity to present additional information on its proposal regarding public interest projects, which request was granted by the Commission.

3. At the conclusion of the hearing, the Hearing Examiner closed the record in the case with no provision for the acceptance or future consideration by the Commission of Staff’s

response to the questions raised by the Commission and other parties with regard to the public interest proposal.

4. On September 29, 2016 Staff filed a Memorandum addressing the Commission's request to provide more specificity on the public interest proposal. Staff requests that the Commission consider Staff's filing at the next regularly scheduled meeting, now scheduled for October 6, 2016.

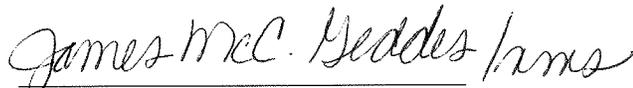
CONCLUSION

1. That the record in the caption proceeding be opened for the limited purpose of considering Staff's Memorandum on public interest projects, and any responses to it by other parties.

2. That the Commission consider Staff's Memorandum as its response to the Commission's request for more specificity regarding its proposal on public interest projects.

3. That the Commission grant what further relief that it deems appropriate in connection with Staff's request to open the record and consider Staff's Memorandum.

Respectfully Submitted:



James McC. Geddes

Rate Counsel

Dated: September 29, 2016