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June 15, 2017

**Financial Accounting Standard Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116**

RE: File Reference No. 2017-230

Dear Technical Director,

We appreciate the opportunity to provide feedback on the Invitation to Comment on the Efficiency and Effectiveness of the U.S. GAAP Financial Reporting Taxonomy, and commend the Financial Accounting Standards Board (FASB) for its efforts to improve XBRL data.

The following are our responses from the perspective of a preparer of XBRL data.

Question 1: Should dimensions be used in tagging the primary financial statements?

We believe the use of dimensions in tagging the financial statements should continue to be utilized.

Question 2: Should dimensions be primarily used for disaggregation, with a limited set of known exceptions?

Yes, dimensions should be used primarily for disaggregation but also be allowed for use for limited other purposes. Specifically, Exelon finds value in using dimensions in two areas: (1) Legal Entity [Axis] and (2) Scenario [Axis]. Certain companies use dimension in tagging the primary financial statements due to the corporate structure and filing status of reported entities with the SEC. For example, companies in the Utilities, Power and Energy industries have multiple SEC registrants reporting XBRL data filed under one CIK number, and in this case they use the Legal Entity Axis as a dimension to tag the primary financial statements for each registrants rather than filing separate XBRL data for each registrant. The use of the Legal Entity Axis as a dimension to tag the primary financial statements lessens the burden of XBRL and saves costs. This is consistent with the position we shared with the FASB during our tenure on the Taxonomy Advisory Group (TAG) and during the simplification initiative interviews in 2014. Additionally, as companies frequently engage in M&A activities there is a requirement for predecessor and successor presentation of financial statements. Using the Scenario Axis as a dimension allows for companies to accurately present XBRL data. Otherwise, we are not aware of any other way to accurately tag predecessor and successor facts.

Question 3: Would the completion of the reference project increase the efficiency and effectiveness of the GAAP Taxonomy? Given the existing resources, should the completion of the reference project be a high priority?

Yes, the completion of the reference project will increase the efficiency and effectiveness of the GAAP Taxonomy. We believe the inclusion of the line item elements with the reporting requirements in the codification will result in efficient and accurate element selection, ensure fewer extensions and reduce inaccurate element selection. Currently, XBRL data preparers spend a significant amount of time searching for appropriate XBRL elements for the disclosure items per the codification.

Yes, the completion of the reference project should be a high priority.

Question 4: Are there other methods to simplify element selection that you would suggest? How would those methods improve the usability of the GAAP Taxonomy?

The GAAP Taxonomy is excessively large resulting in navigation concerns due to difficulty and time spent searching for elements. The following are other suggestions that would improve the efficiency and effectiveness of the GAAP Taxonomy:

- Categorize the Taxonomy into groups. The inclusion of the following groups will improve the efficiency and effectiveness of the GAAP Taxonomy
 - Low usage element group, this will eliminate the crowding effects of low usage elements and reduce time spent investigating for appropriate elements
 - Grouping by levels 1, 2, 3 and 4, this will facilitate a one stop search for locating text block or more detailed elements and therefore reducing time spent searching for appropriate elements.

Question 5: What types of implementation resources supporting registrant use of the GAAP Taxonomy are most efficient and effective? How would you prioritize registrant need for the types of implementation resources listed in paragraphs 1.54 and 1.55 (as well as any others that you think should be considered)?

We find the Taxonomy Implementation Guides, Taxonomy Implementation Notes, Release Notes and Change Notes included in the GAAP Taxonomy to be the most effective resources supporting registrant's use of the GAAP Taxonomy. The Taxonomy Implementation Guides have the highest use because of resourceful data modeling examples it provides to registrants.

In our experience most of the other implementation resources listed in paragraphs 1.54 and 1.55 have been less helpful.

Question 7: Does issuing proposed changes to the GAAP Taxonomy concurrent with the FASB's proposed and final ASUs lessen the timing issues between a registrant's adoption of GAAP updates and consequential changes to the GAAP Taxonomy?

Yes, issuing the proposed changes to the GAAP Taxonomy concurrent with the FASB's proposed and final ASUs would lessen the timing issues between a registrant's adoption of GAAP updates and consequential changes to the GAAP Taxonomy.

Question 8: Should the FASB Taxonomy staff replace the current annual 60-day comment period for the proposed Taxonomy Update with an exposure process that corresponds with the required adoption of GAAP improvements?

As indicated in question 7, we believe that more timely proposed changes to the taxonomy for new GAAP will be beneficial however, for routine changes and updates to the taxonomy we would not change our current practice of updating the taxonomy on an annual basis.

We would be pleased to provide further assistance to the FASB staff on efforts to improve the usability of the GAAP Taxonomy. If you have any questions regarding the comments provided in this letter, please contact Yemisi Lawal, Yemisi.Lawal@Exeloncorp.com.

Very truly yours,



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