



July 22, 2020

VIA ELECTRONIC MAIL

**Transmission Owners**

American Electric Power Service Corporation, on behalf of its affiliates, Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company, Kingsport Power Company, Ohio Power Company, Wheeling Power Company, AEP Appalachian Transmission Company, AEP Indiana Michigan Transmission Company, AEP Kentucky Transmission Company, AEP Ohio Transmission Company, and AEP West Virginia Transmission Company

FirstEnergy Service Company, on behalf of its transmission owning affiliates, including Jersey Central Power & Light Company, Metropolitan Edison Company, Pennsylvania Electric Company, Monongahela Power Company, The Potomac Edison Company, West Penn Power Company, Trans-Allegheny Interstate Line Company and American Transmission Systems, Incorporated

The Dayton Power and Light Company  
Duquesne Light Company  
East Kentucky Power Cooperative  
Exelon Corporation

PPL Electric Utilities Corporation  
Public Service Electric & Gas Company  
UGI Utilities Inc.  
Virginia Electric and Power Company d/b/a Dominion Energy Virginia

**Joint Stakeholders**

Ms. Jolene M. Thompson  
American Municipal Power, Inc.

Mr. Marcus Harris  
Old Dominion Electric Cooperative

Ms. Sharon K. Segner  
LS Power

Mr. Robert A. Weishaar, Jr.  
Ms. Susan E. Bruce  
PJM Industrial Customer Coalition

Re: End of Life Transmission Planning Letters

Dear Stakeholders:

Thank you for your letters of May 22<sup>nd</sup>, June 26<sup>th</sup> and June 30<sup>th</sup> to the PJM Board of Managers (“PJM Board”) presenting your concerns and perspectives regarding the management of end of life (“EOL”) conditions and

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replacement projects. Thank you also for sharing your thoughts on our stakeholder process and the appropriate parameters for deliberation within that process.

The PJM Board acknowledges the challenges presented by this issue, and appreciates the efforts devoted to this matter by all stakeholders. As you know, a compromise solution on EOL projects could not be realized by the Joint Stakeholder and the Transmission Owner constituencies, and the Joint Stakeholder package that passed the PJM Members Committee on June 18, 2020 garnered necessary voting support while simultaneously drawing opposition by others, including PJM.

PJM filed the Joint Stakeholder EOL package on July 2, 2020 at the Federal Energy Regulatory Commission (“FERC”) under section 205 of the Federal Power Act. PJM did so, despite its concerns regarding the package, in accordance with its obligation to the membership under the PJM Operating Agreement.

PJM has separately filed comments with the FERC regarding the Joint Stakeholder EOL package, expressing its concerns that the package violates established authority, including the Consolidated Transmission Owners Agreement. PJM also expressed that the RTO has significant implementation concerns should the FERC adopt the Joint Stakeholder EOL package. To the extent stakeholders may agree or disagree with PJM over these views, stakeholders are equally afforded the opportunity to make their positions known to the FERC.

Again, the PJM Board recognizes that this has been a challenging issue. We believe PJM has operated in as transparent a manner as possible, fulfilling its obligation to the membership through its filing of the Joint Stakeholder EOL package at the FERC, while concurrently expressing its concerns about the package as the independent RTO tasked with planning the bulk power system.

Sincerely,

*Dean Oskvig*

Dean Oskvig  
Chair of the Reliability & Security Committee  
PJM Board of Managers