

Old Dominion Electric Cooperative (ODEC) and American Municipal Power, Inc. (“AMP”) appreciated your facilitation of the December 8, 2015 Mid Atlantic Sub Regional RTEP meeting. Among all the TO’s in that group, the Supplemental Projects totaled almost \$1.4B. As you are aware, ODEC and AMP are concerned about the recent rapid rise in transmission rates. While we have no interest in second guessing individual TO decisions, we are interested in assuring the FERC Order 890 planning process is followed to assure the facilities we will be paying for are planned and developed in a cost effective manner.

To that end, ODEC and AMP are interested in participating fully in the PJM local, as well as regional planning processes, which include being involved in the early stages of the process and, thus, able to offer meaningful input and participate fully in the transmission planning process prior to the local and regional plans being finalized. This would include an opportunity to review criteria, assumptions and models each Transmission Owner uses to plan Supplemental Projects.

As we discussed during the December 8, 2015 meeting, please find attached the Commission’s June 22, 2015 Order in ER13-198. Paragraphs 16- 19 clarify how the Commission expects the local planning process to unfold.

During the meeting, we determined that the best approach to move forward would be to provide written comments and questions to the group, provide an opportunity for the Transmission Owners, and to the extent necessary, PJM, to gather the information necessary to address stakeholder input and then schedule another Sub-Regional meeting. To that end, below is general information that ODEC and AMP believe is needed for any Supplemental Project as well as some initial questions on some specific projects presented.

General:

Stakeholders need background and supporting documentation from each Transmission Owner for their Supplemental Projects. This would include, but not limited to:

1. Underlying need for this project: aging infrastructure, operational needs, reliability, etc. Transmission Owners need to provide information to explain the bigger picture on the Supplemental Project and the basis for its need.
2. Alternatives reviewed by the Transmission Owner and reasons and justifications for why they choose this particular solution
3. Criteria, guidelines or models used in the Transmission Owners’ analysis
4. Net costs, not gross. Net of contributions in aid of construction by retail customers
5. Justification for in-service dates as these dates impact others’ abilities to schedule outages with PJM
6. Better maps, including at a minimum, one high level map and more detailed maps that show both existing and proposed facilities for the Supplemental Project
7. Details on the status of the project: planning stage, right of way acquisition phase, design phase, ordering equipment stage, construction, etc.

Specific:

Bergen-Bergen GT 138 kV: Please provide more detail on the driver for this project. For example, what has changed so the GT is no longer able to achieve full output? Please provide more detail on the scope

of work. For example, what is the current and replacement conductor size. Will there be any pole replacements?

Middletown Junction – Copperstone: Please provide more detail on the driver for this project. Is this a standard Met Ed design or a customer specific request with a contribution in aid of construction?

Pepco Projects: See the general information described above. Additionally, please describe the analysis and criteria Pepco uses to decide when to replace versus maintain existing facilities. Does Pepco evaluate its system for reliable operation with the line retired and removed from service? How does Pepco decide what specification and capability is required for the replacement facilities? What criteria is used to move from a radial to a looped system?

PPL Projects: See the general information described above. Please explain what an expansion period is and what is the expected age for the end of life of these facilities. Please explain how PPL identifies and prioritizes which facilities to replace. Does PPL evaluate its system for reliable operation with the line retired and removed from service? How does PPL decide what specification and capability is required for the replacement facilities? Please describe existing facility specifications and latest PPL specifications. What is the issue with line tapped transformers at regional substations? What is a regional substation? Describe the analysis of maintenance costs used to justify replacement of existing facilities. Please describe the process PPL uses to improve work efficiency and reduce outages. Please describe the drivers for PPL's relay and control house improvements.

For each PPL project, please describe the current and replacement facility specifications and ratings.

Victaulic: Please describe PPL's criteria to install a second tap.

Shillington: Please describe the need for this project.

Bartonsville and Hamlin: Please describe PPL's drivers and criteria to determine when to move from a single to double circuit.

Sunbury and Columbia: Please describe the need for this project.

Buxmont and Martins Creek: Please describe PPL's reliability criteria for improvement as well as how PPL determined this facility had reached the end of its life.

PSEG Aging Infrastructure Projects: Please explain how PSEG identifies and prioritizes which facilities to replace. Does PSEG evaluate its system for reliable operation with the line retired and removed from service? How does PSEG decide what specification and capability is required for the replacement facilities? Please describe existing facility specifications and latest PSEG specifications.

PSEG Capacity for Future Load Growth Projects: Please fully describe the drivers for these projects, including the reliability criteria used by PSEG and the alternatives considered. Please fully describe how the new facilities will be operated (network or radial). Please explain why these should not be considered planning projects as part of the PJM RTEP process versus PSEG Supplemental Projects.

PSEG Projects to address 13kV Distribution: Please fully describe the drivers for these projects, including the reliability criteria used by PSEG and the alternatives considered. Please fully describe how the new facilities will be operated (network or radial).