

**COMMENTS OF THE JOINT CONSUMER ADVOCATES REGARDING  
THE PJM TRANSMISSION OWNERS'  
PROPOSED REVISIONS TO ATTACHMENT M-3**

The Office of the People's Counsel for the District of Columbia, the Maryland Office of People's Counsel, the New Jersey Division of Rate Counsel, and the West Virginia Consumer Advocate Division (together the "Joint Consumer Advocates") provide the following comments in response to the Notice of Transmission Owners ("TOs") Consultation with the Members Committee Regarding Proposed Amendments to Attachment M-3 of the PJM Tariff dated May 7, 2020 ("Notice") and the TOs' proposed revisions to Attachment M-3, dated May 29, 2020.

The Notice and proposed Attachment M-3 revisions are unjust, unreasonable and otherwise not permissible on procedural and substantive grounds. Among other concerns, the Notice and proposed Attachment M-3 revisions are deficient because (1) the Notice did not comply with provisions of the CTOA; and (2) the proposed Attachment M-3 revisions are unjust and unreasonable in several respects, including (a) new definitions, including "Asset Management Project" and "Incidental Increase"; (b) expansion and reliance on inapplicable FERC precedent regarding asset management; and (c) providing for TO transmission planning that violates the requirement for open, coordinated and transparent transmission planning by PJM.

Additionally, the proposed revisions are not supported by the PJM Members. The PJM TOs maintain that their Attachment M-3 revisions are consistent with PJM's end-of-life proposal. The PJM end-of-life proposal received only 1.77 support among stakeholders at the May 28, 2020 Markets and Reliability Committee meeting and was opposed by Members in every sector.

The PJM TOs, and PJM, have a responsibility to work constructively with all stakeholders to endeavor to develop proposals that are broadly supported and meet FERC standards for an open and transparent planning process. Accordingly, the Joint Consumer Advocates urge the PJM TOs to forego filing the proposed Attachment M-3 revisions with FERC and instead continue discussions with stakeholders to ensure that end-of-life transmission planning is conducted by PJM in compliance with FERC requirements.