

**COMMENTS OF OLD DOMINION ELECTRIC COOPERATIVE,
AMERICAN MUNICIPAL POWER,
PJM INDUSTRIAL CUSTOMER COALITION,
AND LS POWER ON
PJM TRANSMISSION OWNERS'
PROPOSED REVISIONS TO ATTACHMENT M-3**

Old Dominion Electric Cooperative (“ODEC”), American Municipal Power (“AMP”), PJM Industrial Customer Coalition (“PJMICC”) and LS Power provide these comments in response to the Notice of Transmission Owners 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. Accordingly, ODEC, AMP, PJMICC and LS Power urge the PJM TOs to forego filing the proposed Attachment M-3 revisions with FERC. Instead, the PJM TOs should continue discussions with stakeholders to ensure that end-of-life transmission planning is conducted by PJM in compliance with FERC requirements.