

In order to fully and accurately respond to questions regarding the design components proposed by AMP in the TRPSTF, AMP and ODEC provide the following.

I. Background

At the September 26, 2017 TRPSTF meeting, in accordance with the PJM CBIR process, AMP presented design components and a proposed solution developed by AMP and ODEC in the PJM design matrix. On October 25, 2017, the TOs, represented by Gloria Godson, posed a series of verbal questions to AMP regarding the design components that AMP presented at the September 26, 2017 TRPSTF meeting. AMP, ODEC, PJMICC, and state and consumer representatives responded to nearly all of the questions in real time during the course of the meeting. However, some questions were not able to be answered fully or completely during the meeting. AMP committed to providing additional answers at the subsequent meeting. AMP requested that the questions be provided in written format to ensure completeness and accuracy of the questions and responses. The TOs declined to provide the questions during or after the meeting.

At the November 29, 2017 TRPSTF meeting, AMP and ODEC provided the additional answers verbally. Additionally, AMP and ODEC modified the proposed solution to address some of the concerns as reflected by the questions posed by the TOs as recorded by AMP during the October 25, 2017 TRPSTF meeting. At the November 11, 2017 TRPSTF meeting at the conclusion of the presentation of additional responses and the modified design components, the TRPSTF facilitator requested that the TOs respond to the answers and design revisions provided. The TOs did not provide a response but indicated that they would provide feedback at the next scheduled TRPSTF meeting. Accordingly, the agenda, as posted on January 18, 2018, for the January 22, 2018 TRPSTF meeting included only four substantive items, two of which were: "TO response to AMP's response to TO questions" and "TO response to AMP's latest proposed design matrix."

At the January 22, 2018 TRPSTF meeting, the TOs indicated that they did not believe AMP had answered the questions posed but could not identify which questions were not answered. An offer by AMP to review the questions and answers as recorded by notes taken in real time was rejected. Additionally, the TOs represented that, because their questions were designed to better understand the design components and solution offered, they were unable to provide any response or feedback to the AMP and ODEC design and solution. The TOs agreed to provide the questions posed verbally at the October 25, 2017 meeting in writing and requested written responses. After AMP inquired about the timing of the written questions on January 24, 2018, an abbreviated version of the questions were provided. AMP's and ODEC's responses to the January 24, 2018 questions are below.

II. Responses to written questions as asked by the TOs on January 24, 2018

AMP and ODEC provide the following responses to the questions posed by the TOs. If we have misinterpreted the question, we are happy to discuss further during the TRPSTF meeting or respond to follow-up questions.

TRPSTF - QUESTIONS ON AMP'S DESIGN ELEMENTS

1. Are AMP's proposed detailed changes in timelines (AMP No 1) to be applied only to EOL/aging infrastructure projects, all supplemental projects, or all projects considered under the RTEP process, including baseline projects?

A1. The proposed changes in timelines will apply only to EOL/aging infrastructure projects per the TRPSTF charter. These changes could be implemented for all projects, Supplemental and RTEP via other PJM processes but that is beyond the scope of this task force.

2. Has AMP adapted its proposed timeline from timelines used in other RTOs or regional planning processes? If so please identify them.

A2. No. The timelines are designed to give stakeholders sufficient time to review and analyze information provided by the PJM TOs through PJM while keeping the EOL planning process expeditiously moving forward. We welcome TO input and feedback on this design component.

3. Under AMP's proposal to fully incorporate the EOL/aging infrastructure decision making process into the PJM planning protocols, with PJM responsible for reviewing and approving criteria, assumptions, etc., (AMP No 2), what would the TOs' role be?

A3. The premise of the question is incorrect. Under row 2, as explained at the November 29, 2017 meeting, PJM and stakeholders review and validate the TO criteria, assumptions, guidelines and models. PJM and stakeholders provide feedback and any concerns with TO-provided criteria, assumptions, guidelines and models. Thus, the TOs' role would be the same as it is now for RTEP projects: identification of facilities that do not meet a planning criteria (NERC, PJM or TO criteria). PJM and the TOs would confirm the violation. Then PJM would publish the violation and ask for solutions. The TOs would offer solutions and stakeholders would be able to offer their own solutions, ask questions and get clarifications on the TO's solutions so that all parties can agree on the best solution to the violation.

4. What standards would PJM apply to review TOs' criteria, assumptions, guidelines, and models for EOL/aging infrastructure projects?

A4. AMP and ODEC understand this question to be how PJM would implement its review of the TOs' criteria/assumptions/guidelines/models? See examples of how PJM has been doing this for Dominion and PSE&G EOL criteria in the FERC Form 715 filing. We see this same process applying to all TOs' EOL criteria/assumptions/guidelines/models. Accordingly, the TOs' criteria/assumptions/guidelines/models would have to be well defined and detailed so PJM could verify that there is a violation and any specific facility has reached its EOL and requires replacement.

5. What responsibility would PJM have if, under PJM-reviewed TO criteria, assumptions, guidelines, and models, a replacement facility was not constructed for a transmission facility that failed or required emergency replacement?

A5. This seems like a timing issue to us. If the facility has failed, then it is a replacement as a failed facility. A 500-230kV auto transformer comes to mind in this scenario. If the TO has identified the same auto transformer as having reached its end of life based on that TO's criteria, but the transformer has not failed, then it is a planning activity. As for transmission lines, the same process would be applied, although a complete failure of a line is a highly unlikely scenario. It is much more likely that the TO has identified the facility as having reached its EOL pursuant to that TO's criteria and it would fall into the PJM RTEP planning process.

6. Does AMP's proposal that PJM make a determination on any Local Plan project if there is a disagreement between a stakeholder and the TO (AMP No 6) apply whenever the stakeholder disagrees that a TO's proposed project is needed?

A6. The premise of the question is incorrect. Under row 6, as explained at the November 29, 2017 meeting, should there be disagreement between a TO and a stakeholder regarding a Local Plan project, the committee participant will document its disagreement in writing. If the disagreement cannot be resolved informally, either stakeholder may utilize the standard OA ADR process.

7. Does this proposal give stakeholders or PJM the authority to override a TO's planning for Local Plan projects?

A7. As the Local Plan is a product of the Subregional RTEP Committees rather than of the TOs alone, this question is unclear. This proposal provides the same authority that exists today for all PJM RTEP projects to all EOL/aging infrastructure projects.

8. What responsibility would PJM have if, based on stakeholder opposition, it does not select a project a TO thinks is needed?

A8. See response to question 7. See also the PJM governing documents regarding liability.

9. Regarding AMP's proposal that TOs treat non-TO facilities as comparable to the TOs facilities (AMP No. 5), please describe any circumstance in which a TO failed to include the transmission needs of non-TOs for load growth, access to PJM or other markets, or any other non-TO transmission need in its planning for EOL/aging infrastructure projects or other Supplemental Projects?

A9. The proposal, in row 5 requests that TOs treat non-TO *load* comparably to TO *load*. AMP does not currently own any transmission facilities. AMP, ODEC, and others are required to provide annual load forecasts to our TOs and assume this is consistent with the other TOs. Non-TO facilities are typically not studied by PJM unless they are included in PJM's list of monitored facilities. Comparability is one of several Order 890 obligations for transmission planning and it was included in the matrix not by AMP and ODEC but as one of the components that is critical to maintain compliance with Order 890.