

Via Electronic Mail

The PJM Board of Managers
PJM Planning Department
PJM Interconnection, LLC
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Audubon, PA 19408
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January 26, 2026

Re: Comments on PJM's 2025 RTEP Window 1 MAAC Regional Cluster Competitive
Solution 2025-W1-237

To PJM Board of Managers and Planning Department:

The Pennsylvania Public Utility Commission ("Commission") is writing to express concern about the selection processes used by PJM for Proposal 237 in its 2025 RTEP Window 1. The Commission appreciates the expertise of PJM's planners and the vital work they perform to ensure reliability for the region's transmission system. In this case, however, we believe that further analysis and consideration is necessary before final selection of this project. This letter is intended for the limited purpose of communicating the Commission's concerns regarding the selection processes used by PJM for Proposal 237 in its 2025 RTEP Window 1. We request PJM engage in further analysis and consideration before final project selection. Nothing in this letter should be construed as prejudging or limiting the Commission's review and consideration of any future project-related matter that may be raised before the Commission.

Proposal 237, developed jointly by Exelon and NextEra, would extend from Kammer, WV to Juniata, PA in order to address a few potential thermal violations (mostly 230 kV in PPL) and a Juniata Sunbury 500 kV line as being at the end of its useful life. The Commission places the highest value on grid reliability. In this instance, however, we urge PJM to take additional time to explore all available options to address the problems Proposal 237 has been selected to correct. Given the projected cost of constructing this project of nearly \$2 billion and the long lead-time for some of the needs it would address, the Commission urges PJM to conduct an exhaustive evaluation of all possible solutions before final selection.


The Commission believes the structure of the problem statement and the 60-day competitive window may have led to insufficient competition, including from solutions that were not strictly reliant upon transmission lines. PJM's Operating Agreement^[1] provides that it will run 120-day windows for long-lead projects. Further, the problem statement specifically stated, "PJM doesn't currently see major regional transfer issues in the 2030 analysis."^[2] Although PJM recognized there were 500 kV overloads in MAAC for the 2032 case, it offered that, "the violations can be mitigated without long lead-time solutions."^[3] Taken together, PJM was clearly signaling that long-lead solutions, like a new 765 kV backbone, were not sought.

Prior to final selection, we encourage PJM to explore additional options to address the relevant problem statement. Specifically, we suggest PJM examine possible generation solutions that may meet the needs in the PPL zone before committing to this major backbone transmission project. At a minimum, the Commission requests that PJM conduct analysis to determine the total amount of new generation capacity necessary to address the forecasted shortfall in central Pennsylvania.


To ameliorate concerns about addressing a longer term need with the shorter 60-day window used in this process, the Commission believes there may also be value in breaking this project into phases. PJM could proceed with the portions that address the most immediate reliability concerns while delaying the major backbone portion until further analysis can be conducted. The reliability need triggering the 765 kV backbone project, likely to be built over the course of many years, will not be materially harmed by a stepwise approach to ensure full competition and least-cost results. We appreciate the vital importance of regional grid reliability. With respect to this project, we believe Pennsylvanians would be ill-served by a final selection occurring until all possible alternatives have been thoroughly evaluated in a more transparent manner and in compliance with PJM's Operating Agreement. We call on the PJM Board to acknowledge the unique characteristics of the proposed project and proceed in a careful, measured, and deliberative fashion.

Thank you for the opportunity to submit these comments.


Sincerely,



Stephen M. DeFrank
Chairman



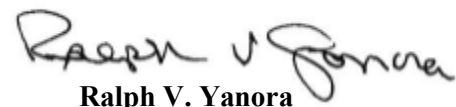
Kimberly M. Barrow
Vice Chair



John F. Coleman, Jr.
Commissioner



Kathryn L. Zeffuss
Commissioner



Ralph V. Yanora
Commissioner

^[1] Schedule 6, Section 1.5.8(c).

^[2] 2025 Window 1 Problem Statement, at 6.

^[3] 2025 Window 1 Problem Statement, at 7.