

**Notice of the PJM Transmission Owners Consultation with the Members Committee  
Regarding a Proposed Revision to the PJM Tariff, Attachment M-3**

Pursuant to Section 7.3.2 of the Consolidated Transmission Owners Agreement (“CTOA”) and Section 9.1(b) of the PJM Interconnection, L.L.C. (“PJM”) Open Access Transmission Tariff (“Tariff”), the Transmission Owners Agreement Administrative Committee hereby initiates consultation with the PJM Members Committee regarding a proposed revision to Attachment M-3 of the PJM Tariff to comply with the requirements of Federal Energy Regulatory Commission’s (“FERC”) Order No. 1920 (“Proposed Revision”). Subject to vote in accordance with Section 8.5.1 of the CTOA, the PJM Transmission Owners (“PJM TOs” or “Transmission Owners”) intend to jointly make a filing under Section 205 of the Federal Power Act with FERC proposing the revision.

As discussed further herein, the PJM TOs’ Proposed Revision consists of a new subsection 6 under section (a) to reference transmission enhancements or expansions under the Long-Term Regional Transmission Planning (“LTRTP”) Protocol.

**Background**

FERC Order No. 1920, issued May 13, 2024, requires transmission providers to develop and implement a regional transmission planning process that includes Long-Term Regional Transmission Planning (“LTRTP”).<sup>1</sup> Order No. 1920 requires LTRTP to be “sufficiently long-term, forward-looking, and comprehensive” and the order sets forth several requirements to achieve these goals.<sup>2</sup> As a transmission provider, PJM must develop and implement an Order No. 1920 LTRTP Protocol for the PJM region.<sup>3</sup> On October 8, 2025, ahead of the October 10, 2025 TEAC Special Session on Order No. 1920, PJM published provisions to govern its LTRTP Protocol.<sup>4</sup>

In compliance with Order No. 1920, PJM proposes to develop a Long-Term Regional Transmission Plan. The Long-Term Regional Transmission Plan shall consolidate the Long-Term Transmission Projects that holistically address Long-Term Transmission Needs of the region into a single plan which meets long-term needs of the PJM Region by (i) maintaining the reliability of the PJM Region in an economically efficient manner; (ii) enhancing the efficiency and operational performance of wholesale electric service markets; (iii) advancing federal, tribal, state, and local public policies; and (iv) facilitating the efficient long-term integration of generation resources.

Order No. 1920 also sets forth requirements for local planning. Specifically, FERC found there is insufficient transparency in local planning processes and insufficient coordination between local and regional transmission planning processes. To address these deficiencies,

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<sup>1</sup> *Bldg. for the Future Through Elec. Reg’l Transmission Planning & Cost Allocation*, Order No. 1920, 89 FR 49280 (June 11, 2024), 187 FERC ¶ 61,068 (2024).

<sup>2</sup> *Id.* at PP 224, 248.

<sup>3</sup> *Id.* at P 1 n2.

<sup>4</sup> Operating Agreement, Schedule 6D.

Order No. 1920 requires reforms to (1) enhance the transparency of the local transmission planning process; and (2) require transmission providers to evaluate whether transmission facilities that need replacing can be “right-sized” to more efficiently or cost-effectively address Long-Term Transmission Needs identified in LTRTP.<sup>5</sup>

While PJM is obligated to implement the Order No. 1920 LTRTP, the Transmission Owners have retained responsibility for local planning, including the right to file tariff changes pursuant to section 205 for any tariff changes regarding local planning. The Local Planning process is set forth in Attachment M-3 to the PJM Tariff. After careful review, the Transmission Owners determined that Attachment M-3 already satisfies the local planning transparency requirements of Order No. 1920. The compliance obligations of the PJM TOs with respect to right-sizing replacement facilities are being addressed in proposed Tariff, Attachment M-5, which is subject to a separate notice issued concurrently to the Members Committee.

Tariff, Attachment M-3, section (a) also specifies the planning criteria PJM is authorized to address, reserving to the PJM TOs all other planning.<sup>6</sup> While some of these planning criteria, such as reliability standards, may be implicated in long-term planning under Order No. 1920, others address criteria not currently included in Attachment M-3, section (a). In order to facilitate PJM’s compliance with Order No. 1920, the Proposed Revision adds LTRTP to the list of planning criteria that PJM is authorized to address.

### **Proposed Revision in the PJM Tariff**

Accordingly, pursuant to Section 9.1 of the Tariff and Article 7 of the CTOA, the PJM TOs are planning to propose amending Tariff, Attachment M-3, section (a), adding a new subsection 6 to section (a):

6. the Long-Term Regional Transmission Planning Protocol set forth in Operating Agreement, Schedule 6D, provided that the Additional Procedures for Planning Right-Sized Transmission Projects set forth in Tariff, Attachment M-5 also shall apply, as applicable.

### **Stakeholder Process/Upcoming Meeting**

Attachment A contains a copy of Attachment M-3 with the Proposed Revision, the addition of subsection (a)(6), in redline. The PJM TOs propose that the Tariff provision becomes effective on June 12, 2027, or such other effective date that the Commission accepts for PJM’s Long-Term Regional Transmission Plan.

The Transmission Owners Agreement Administrative Committee will vote on the Proposed Revision at its December 8, 2025 meeting. Consistent with the FERC’s February 6, 2025 order, the PJM TOs’ filing to comply with the requirements is due on December 12, 2025.<sup>7</sup>

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<sup>5</sup> *Id.* at P 1577.

<sup>6</sup> *Am. Mun. Power, Inc. v. FERC*, 86 F.4th 922, 927 (D.C. Cir. 2023).

<sup>7</sup> Notice of Extension of Time, Docket No. RM21-17 (Feb. 6, 2025).

Written comments on the PJM TOs' proposal may be submitted for consideration by email to: [Comments\\_For\\_Transmission\\_Owners@steptoe.com](mailto:Comments_For_Transmission_Owners@steptoe.com) on or before Monday, December 1, 2025.

**Attachment A**

**Proposed Revision to PJM Tariff, Attachment M-3 to Implement Order No. 1920  
Long-Term Regional Transmission Planning Protocol**

**ATTACHMENT  
M-3  
ADDITIONAL PROCEDURES FOR PLANNING  
SUPPLEMENTAL PROJECTS AND ASSET MANAGEMENT PROJECTS**

**(a) Applicability.** Each Transmission Owner shall be responsible for planning and constructing in accordance with Schedule 6 of the Operating Agreement as provided in this Attachment M-3, to the extent applicable, (i) Asset Management Projects, as defined herein, (ii) Supplemental Projects, as defined in section 1.42A.02 of the Operating Agreement, and (iii) any other transmission expansion or enhancement of Transmission Facilities that is not planned by PJM to address one or more of the following planning criteria:

1. NERC Reliability Standards (which includes Applicable Regional Entity reliability standards);
2. Individual Transmission Owner planning criteria as filed in FERC Form No. 715 and posted on the PJM website, provided that the Additional Procedures for the Identification and Planning of EOL Needs, set forth in section (d), shall apply, as applicable;
3. Criteria to address economic constraints in accordance with section 1.5.7 of the Operating Agreement or an agreement listed in Schedule 12-Appendix B;
4. State Agreement Approach expansions or enhancements in accordance with section 1.5.9(a)(ii) of the Operating Agreement; ~~or~~
5. An expansion or enhancement to be addressed by the RTEP Planning Process pursuant to section (d)(2) of this Attachment M-3 in accordance with RTEP Planning Process procedures in Schedule 6 of the Operating Agreement-; or
6. The Long-Term Regional Transmission Planning Protocol set forth in Operating Agreement, Schedule 6D, provided that the Additional Procedures for Planning Right-Sized Transmission Projects set forth in Tariff, Attachment M-5 also shall apply, as applicable.

This Attachment M-3 shall not apply to CIP-014 mitigation projects that are subject to Attachment M-4.

**(b) Definitions.**

1. Asset Management Project. “Asset Management Project” shall mean any modification or replacement of a Transmission Owner’s Transmission Facilities that results in no more than an Incidental Increase in transmission capacity undertaken to perform maintenance, repair, and replacement work, to address an EOL Need, or to effect infrastructure security, system reliability, and automation projects the Transmission Owner undertakes to maintain its existing electric transmission system and meet regulatory compliance requirements.

2. Attachment M-3 Project. "Attachment M-3 Project" means (i) an Asset Management Project that affects the connectivity of Transmission Facilities that are included in the Transmission System, affects Transmission Facility ratings or significantly changes the impedance of Transmission Facilities; (ii) a Supplemental Project; or (iii) any other expansion or enhancement of Transmission Facilities that is not excluded from this Attachment M-3 under any of clauses (1) through (5) of section (a). "Attachment M-3 Project" does not include a project to address Form No. 715 EOL Planning Criteria. 3.

Incidental Increase. "Incidental Increase" shall mean an increase in transmission capacity achieved by advancements in technology and/or replacements consistent with current Transmission Owner design standards, industry standards, codes, laws or regulations, which is not reasonably severable from an Asset Management Project. A transmission project that results in more than an Incidental Increase in transmission capacity is an expansion or enhancement of Transmission Facilities.

4. Transmission Facilities. "Transmission Facilities" shall have the meaning set forth in the Consolidated Transmission Owners Agreement, section 1.27.
5. EOL Need. "EOL Need" shall mean a need to replace a transmission line between breakers operating at or above 100 kV or a transformer, the high side of which operates at or above 100 kV and the low side of which is not connected to distribution facilities, which the Transmission Owner has determined to be near the end of its useful life, the replacement of which would be an Attachment M-3 Project.
6. Candidate EOL Needs List. "Candidate EOL Needs List" shall have the meaning ascribed to it in section (d)(1)(iii).
7. Form No. 715 EOL Planning Criteria. "Form No. 715 EOL Planning Criteria" shall mean planning criteria filed by a Transmission Owner in FERC Form No. 715 to address EOL Needs. No Transmission Owner may be compelled to file a Form No. 715 EOL Planning Criteria not required to be filed pursuant to FERC regulations applicable to Form No. 715.
8. Attachment M-3 EOL Planning Criteria. "Attachment M-3 EOL Planning Criteria" shall mean planning criteria utilized by a Transmission Owner under Attachment M-3 to address EOL Needs.
9. PJM Planning Criteria Need. "PJM Planning Criteria Need" shall mean a need to plan a transmission expansion or enhancement of Transmission Facilities other than those reserved to each Transmission Owner in accordance with section (a).
10. RTEP Planning Process. "RTEP Planning Process" shall mean the process by which PJM develops the Regional Transmission Expansion Plan under Schedule 6 of the Operating Agreement.

**(c) Procedures for Review of Attachment M-3 Projects.** The following procedures shall be applicable to the planning of Attachment M-3 Projects:

1. **Review of Attachment M-3 Projects.** As described in sections 1.3(c) and (d) of Schedule 6 of the Operating Agreement, the Subregional RTEP Committees shall be responsible for the review of Attachment M-3 Projects. The Subregional RTEP Committees shall have a meaningful opportunity to participate and provide feedback, including written comments, throughout the transmission planning process for Attachment M-3 Projects. Disputes shall be resolved in accordance with the procedures set forth at Schedule 5 of the Operating Agreement. For purposes of this section (c), reference to the Subregional RTEP Committees shall be deemed to include the Transmission Expansion Advisory Committee (TEAC) when the TEAC reviews Attachment M-3 Projects in accordance with these procedures.
2. **Review of Assumptions and Methodology.** In accordance with sections 1.3(d), 1.5.4(a), and 1.5.6(b) and 1.5.6(c) of Schedule 6 of the Operating Agreement, each Subregional RTEP Committee shall schedule and facilitate a minimum of one Subregional RTEP Committee meeting to review the criteria, assumptions, and models Transmission Owners propose to use to plan and identify Attachment M-3 Projects (Assumptions Meeting). Each Transmission Owner shall provide the criteria, assumptions, and models to PJM for posting at least 20 days in advance of the Assumptions Meeting to provide Subregional RTEP Committee Participants sufficient time to review this information. Stakeholders may provide comments on the criteria, assumptions, and models to the Transmission Owner for consideration either prior to or following the Assumptions Meeting. The Transmission Owner shall review and consider comments that are received within 10 days of the Assumptions Meeting and may respond or provide feedback as appropriate.
3. **Review of System Needs.** No fewer than 25 days after the Assumptions Meeting, each Subregional RTEP Committee shall schedule and facilitate a minimum of one Subregional RTEP Committee meeting per planning cycle to review the identified criteria violations and resulting system needs, if any, that may drive the need for an Attachment M-3 Project (Needs Meeting). Each Transmission Owner will review the identified system needs and the drivers of those needs, based on the application of its criteria, assumptions, and models that it uses to plan Attachment M-3 Projects. The Transmission Owners shall share and post their identified criteria violations and drivers no fewer than 10 days in advance of the Needs Meeting. Stakeholders may provide comments on the criteria violations and drivers to the Transmission Owner for consideration prior to, at, or following the Needs Meeting. The Transmission Owner shall review and consider comments that are received within 10 days of the Needs Meeting and may respond or provide feedback as appropriate.

4. **Review of Potential Solutions.** No fewer than 25 days after the Needs Meeting, each Subregional RTEP Committee shall schedule and facilitate a minimum of one Subregional RTEP Committee meeting per planning cycle to review potential solutions for the identified criteria violations (Solutions Meeting). The Transmission Owners shall share and post their potential solutions, as well as any alternatives identified by the Transmission Owners or stakeholders, no fewer than 10 days in advance of the Solutions Meeting. Stakeholders may provide comments on the potential solutions to the Transmission Owner for consideration either prior to or following the Solutions Meeting. The Transmission Owner shall review and consider comments that are received within 10 days of the meeting and may respond or provide feedback as appropriate.
5. **Submission of Attachment M-3 Projects.** Each Transmission Owner will finalize for submittal to the Transmission Provider Attachment M-3 Projects for inclusion in the Local Plan in accordance with section 1.3 of Schedule 6 of the Operating Agreement and the schedule established by the Transmission Provider. Stakeholders may provide comments on the Attachment M-3 Projects in accordance with section 1.3 of Schedule 6 of the PJM Operating Agreement before the Local Plan is integrated into the Regional Transmission Expansion Plan. Stakeholders shall have at least 10 days to comment on the Local Plan after the solutions selected by the Transmission Owner for inclusion in the Local Plan are posted. Each Transmission Owner shall review and consider comments that are received at least 10 days before the Local Plan is submitted for integration into the Regional Transmission Expansion Plan.
6. **Information Relating to Attachment M-3 Projects.** Information relating to each Transmission Owner's Attachment M-3 Projects will be provided in accordance with, and subject to the limitations set forth in, section 1.5.4 of Schedule 6 of the Operating Agreement. Local Plan Information will be provided to and posted by the Office of Interconnection as set forth in section 1.5.4(e) of Schedule 6 of the Operating Agreement.
7. **No Limitation on Additional Meetings and Communications or Use of Attachment M-3 For Other Transmission Projects.**
  - i. Nothing in this Attachment M-3 precludes any Transmission Owner from agreeing with stakeholders to additional meetings or other communications regarding Attachment M-3 Projects, in addition to the Subregional RTEP Committee process.
  - ii. Nothing in this Attachment M-3 precludes a Transmission Owner from using the procedures set forth in section (c) to solicit stakeholder input in the planning of Transmission Facilities not subject to this section (c) or the RTEP Planning Process.

**(d) Additional Procedures for the Identification and Planning of EOL Needs.**

**1. EOL Need Planning Criteria Documentation and Identification**

- i. Each PJM Transmission Owner shall develop documentation for its Attachment M-3 EOL Planning Criteria and/or its Form 715 EOL Planning Criteria through which each identifies EOL Needs.
- ii. Each Transmission Owner's Attachment M-3 EOL Planning Criteria and/or Form 715 EOL Planning Criteria shall be clearly and separately delineated and presented by the Transmission Owner at least once annually pursuant to section (c)(2) and/or in its FERC Form No. 715 at a meeting of the TEAC.
- iii. Annually, each Transmission Owner will provide to PJM a Candidate EOL Needs List comprising its non-public confidential, non-binding projection of up to 5 years of EOL Needs that it has identified under the Transmission Owner's processes for identification of EOL Needs documented under section (d)(1)(i). Each Transmission Owner may change its projection as it deems necessary and will update it annually. Any Candidate EOL Needs List provided to PJM shall remain confidential within PJM, except to the extent necessary for PJM to make the determination referenced in clause (a) of section (d)(2)(ii).

**2. Coordination of EOL Needs Planning With PJM Planning Criteria Needs.**

- i. If, as part of the RTEP Planning Process, PJM initially determines that a substantial electrical overlap exists such that a single Solution may address a validated PJM Planning Criteria Need(s) identified during the current PJM planning cycle under the RTEP Planning Process and address a projected EOL Need on the Candidate EOL Needs List, which the relevant Transmission Owner has confirmed remains a projected EOL Need, the relevant Transmission Owner shall consult with PJM regarding such potential overlap.
- ii. If, (a) PJM determines through the RTEP Planning Process that a proposed Required Transmission Enhancement would more efficiently and cost-effectively address the identified PJM Planning Criteria Need and may, as well, address the projected EOL Need confirmed under section (d)(2)(i), and (b) the proposed Required Transmission Enhancement is not a solution proposed by the Transmission Owner pursuant to section (c)(4), and (c) the Transmission Owner determines that the projected EOL Need is not met by the proposed Required Transmission Enhancement and determines that it will plan an Attachment M-3 Project to address the projected EOL Need or propose a project to address the Form No. 715 EOL Planning Criteria, the Transmission Owner will provide documentation to PJM and stakeholders on the rationale supporting its

determination at the next appropriate meeting of the TEAC or Subregional RTEP Committee that considered the proposed Required Transmission Enhancement.

- (e) **Modifications.** This Attachment M-3 may only be modified under section 205 of the Federal Power Act if the proposed modification has been authorized by the PJM Transmission Owners Agreement-Administrative Committee in accordance with section 8.5 of the Consolidated Transmission Owners Agreement.