

DominionEnergy.com

June 15, 2026

Via Electronic Mail

PJM Interconnection, L.L.C.

Jason Connell

Vice President, Planning

2750 Monroe Boulevard

Audubon, PA 19408

jason.connell@pjm.com

Dear Mr. Connell:

On behalf of Dominion Energy Virginia's Generation Development organization, we write to reinforce and support the recommendations advanced by Dominion Energy's Electric Transmission organization regarding PJM's planning processes in the letter provided to you dated June 1, 2026.

PJM and its members are operating in an environment of unprecedented and accelerating load growth. This growth is already materializing in system operations, and both generation and transmission planning frameworks must continue evolving to keep pace.

From a generation perspective, alignment between generation execution and transmission availability is critical. We therefore support maintaining a long-term, forward-looking planning approach that ensures the system can reliably and efficiently integrate new resources in the future.

We emphasize two key areas of alignment:

**1. Incorporating executable generation into planning models**

Reliable system outcomes require that planning models reflect projects that can realistically be delivered. We support PJM applying a more execution-focused lens in its Capacity Expansion (CapEx) model by prioritizing dispatchable resources with a high likelihood of reaching commercial operation. Development indicators—such as site control, fueling contracts, major equipment contracts, and permitting progress—should inform resource selection, and we would support generators providing this information to PJM on a confidential basis. This approach will improve prediction models of proposed new generators most likely to be constructed and placed in service, and therefore better align modeled outcomes with deliverable capacity needed to meet demand.

**2. Maintaining an extended transmission planning horizon**

We strongly endorse maintaining an eight-year planning horizon in both the RTEP and FERC Order 1000 processes, consistent with our Electric Transmission organization's recommendations. Sustaining this long-term view is essential to aligning generation development timelines with transmission readiness. If also coupled with the ideas from Item #1 above, it would enable a long-term RTEP planning process that is informed by the most probable generation projects to be constructed and placed in service.

Those generators would likely also benefit from more predictable network upgrades, reducing risk misalignment and delays in generation deliverability.

The challenges facing the system—rapid load growth, longer permitting timelines, constrained outage windows, and increasing project complexity—require coordinated, long-range planning across both generation and transmission. These realities make clear that planning processes must reflect execution constraints and interdependencies.

In closing, we reiterate our strong support for our Electric Transmission organization's recommendations and encourage PJM to continue advancing planning processes that reflect the urgency, scale, and integrated nature of today's system needs.

Sincerely,

A handwritten signature in black ink, appearing to read "Emil Avram", with a stylized, flowing script.

Emil G. Avram  
Senior Vice President – Generation Development  
Dominion Energy Virginia

CC:

Eric Hsia, PJM  
Joshua Stephenson, PJM  
Sami Abdulsalam, PJM

June 18, 2026

PJM Interconnection LLC  
c/o Jason Connell  
2750 Monroe Blvd.  
Audubon, PA 19403

Dear Mr. Connell:

As PJM and its stakeholders, including FirstEnergy, respond to unprecedented load growth, we appreciate the continued evolution of the Regional Transmission Expansion Planning (RTEP) process. The scale, pace and concentration of demand – particularly from large load customers – are reshaping planning assumptions and straining our collective ability to timely meet connection needs.

Two realities are clear: Load growth is already impacting system operations, especially in constrained areas requiring regional solutions. At the same time, transmission development timelines are increasingly challenged by siting, permitting, outage coordination and supply chain constraints. Aligning planning processes with execution realities is essential to establish clear RTEP problem statements and deliver the benefits from longer-term regional solutions while maintaining reliability and meeting customer expectations.

FirstEnergy offers the following perspectives in advocacy of identifying regional transmission solutions beyond the five-year case:

- ***Align RTEP Capacity Expansion Modeling Assumptions with Execution Likelihood:*** Reliable planning depends on deliverable generation. PJM should model generation capacity deployment scenarios informed by reasonable assumptions and demonstration of clear development progress – such as fuel arrangements, site control, permitting status, equipment procurement and interconnection advancement – to reduce reliance on speculative projects and better ensure dependable service to customers.
- ***Maintain a Long-Term Transmission Planning Horizon:*** Transmission development requires long lead times. Sustaining a 7–10-year planning horizon will enable proactive identification of backbone needs, reduce reactive and higher-cost solutions and provide customers and developers the certainty needed to support growth.
- ***Integrate Large Load Projections into Planning:*** Large, clustered load additions – particularly from data centers and electrification – must be more directly incorporated into planning assumptions. Enhanced consistency and coordination

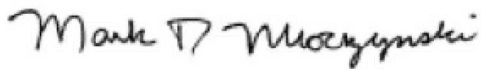
across planning inputs and the use of scenario-based approaches will reduce the risk of underbuilding, delayed connections and inefficient interim solutions.

- ***Strengthen Alignment with State and Local Stakeholders:*** Early, transparent engagement with regulators and communities is critical. A longer transmission planning horizon supports better alignment with state priorities, improves siting outcomes and ensures projects reflect customer needs and economic development goals.
- ***Assess Execution Feasibility:*** Planning must account for real-world constraints, including siting timelines, outage availability, material lead times and construction complexity. This ensures selected solutions are both technically sound and deliverable on the timelines required to serve customers reliably.

FirstEnergy remains committed to working collaboratively with PJM to advance regional transmission solutions that support reliability, affordability and timely customer connections. Strengthening alignment between planning assumptions, modeling parameters, and execution realities will be critical to delivering the outcomes our customers expect.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, reading "Mark D. Mroczynski". The signature is fluid and cursive, with the first name "Mark" and last name "Mroczynski" clearly legible, and a middle initial "D." in between.

Mark Mroczynski  
President, FirstEnergy Transmission