

Duke Energy Ohio – Need No. DEOK-2026-004

OCC appreciates Duke Energy Ohio's presentation of Need No. DEOK-2026-004. Because this project is being presented during the Needs stage of the M-3 process, OCC's comments focus on whether Duke has adequately demonstrated the need for additional transmission facilities and provided sufficient information for stakeholders to evaluate that need.

Duke Energy Ohio's presentation indicates that a customer previously requesting approximately **500 MW** of load near Trenton, Ohio, now plans to increase its requested service by an additional **300 MW** beginning in 2028.

Accordingly, OCC requests additional information regarding:

1. The basis for the revised customer load forecast and what has changed since the prior need presentation.
The customer load request has increased by 300 MW. This is the only change since the prior Need presentation.
2. Whether the additional load reflects expansion by the same customer or additional customer development.
This additional load reflects expansion by the same customer.
3. The level of customer commitment supporting the revised forecast, including executed service agreements and development milestones.
DEO has one Electric Service Agreement (ESA) executed for 250 MW. Additional requested load is still under review.
4. The specific transmission planning criteria demonstrating the need for additional transmission facilities.
The applicable transmission planning criteria is found in PJM Manual 14B: PJM Region Transmission Planning Process, Section (2.3.8) “NERC P3 and P6 “N-1-1” Analysis.
5. Whether the identified need remains under lower customer load assumptions
The scope of the proposed project is determined by the increased customer load. If the increased load changes, the scope of the proposed project may or may not change.
6. Whether future transmission facilities can be developed in phases corresponding to demonstrated customer commitments.
Yes, depending upon the project.

7. Does PJM and/or the transmission owner have any information as to whether the prospective load interconnection customer has submitted similarly sized project proposals in other locations on that transmission owner's system, or in other transmission zones.

While DEO does not currently have a similarly sized project proposal from this customer, DEO does not have access to the information as to whether or not similar sized projects exist in neighboring territories, and the customer may have similarly sized projects underway within other transmission zones in PJM.

8. Has PJM and/or the transmission owner conducted any analyses of the extent to which existing loads need the expansions being considered for the large load interconnection to serve their needs now or in the future. If so, please provide that information.

PJM and DEO evaluate transmission system needs using planning models that include existing load as well as forecasted load growth over the applicable planning horizon. As part of the PJM Regional Transmission Expansion Plan (RTEP) process, PJM performs power flow, short-circuit and stability analysis and evaluates the system against applicable NERC planning criteria. While neither PJM nor DEO have performed a separate analysis that allocates a specific percentage of the need for a given expansion between new load and existing customers, it remains that the PJM RTEP identifies upgrades needed for the operational, economic, and reliability requirements of all PJM customers, and the models used for RTEP incorporate all forecasted loads – not merely the incremental large load.

Because the identified need appears to arise from the expansion of a specific customer request, OCC also requests an explanation of how resulting transmission investments will be planned and funded consistent with cost-causation principles and how existing residential consumers will be protected from costs attributable primarily to serving new large-load customers.

DEO recognizes the importance of ensuring that transmission investments associated with new large-load customers are planned and funded in a manner consistent with applicable cost-causation principles and that existing customers remain protected from costs attributable to directly serving new large loads. For regional transmission facilities identified through the PJM planning process, cost responsibility is determined pursuant to applicable provisions of the PJM Open Access Transmission Tariff and FERC-approved cost-allocation methodology. DEO will continue to coordinate with PJM and applicable regulatory authorities to ensure cost-causation principles are followed in accordance with applicable tariffs.