

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Kammer Juniata Transmission, LLC

)

Docket No. ER26-1734

**MOTION FOR LEAVE TO ANSWER AND LIMITED ANSWER OF
PJM INTERCONNECTION, L.L.C.**

Pursuant to Rules 212 and 213 of the Commission’s Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (PJM) submits this Motion for Leave to Answer and Limited Answer in response to the Motion to Answer and Answer of PPL Electric Utilities Corporation (PPL)² and the Motion for Leave to Answer and Answer of the Pennsylvania Office of Consumer Advocate (OCA).³ The Commission should reject PPL’s and OCA’s arguments concerning the PJM transmission planning process because, as PJM previously explained, those arguments are outside the proper scope of this proceeding and also meritless.⁴

I. LIMITED ANSWER

A. PPL’s and OCA’s Arguments Are Outside the Scope of this Proceeding

OCA and PPL attack the PJM planning process in an effort to undermine the rebuttable presumption applied to the requested rate incentives of Kammer Juniata Transmission, LLC (Kammer Juniata or the Company) under Order No. 679, which requires “a fair and open regional

¹ 18 C.F.R. § 385.212 & .213 (2025).

² Motion to Answer and Answer of PPL Electric Utilities Corporation, Docket No. ER26-1734 (May 11, 2026) (PPL Answer).

³ Motion for Leave to Answer and Answer of the Pennsylvania Office of Consumer Advocate in Reply to PJM Interconnection, L.L.C., Docket No. ER26-1734 (May 11, 2026) (OCA Answer).

⁴ See Motion for Leave to Answer and Answer of PJM Interconnection, L.L.C., Docket No. ER26-1734 at 16-21 (Apr. 24, 2026) (PJM Answer). PJM does not respond herein to each argument raised in OCA’s and PPL’s most recent filings. PJM’s silence with respect to any particular contention should not be construed as acquiescence to, or agreement with, any argument advanced by OCA or PPL.

planning process that considers and evaluates projects for reliability and/or congestion and is found to be acceptable to the Commission.”⁵ Those collateral attacks on PJM’s planning process fall outside the scope of this proceeding and squarely conflict with the Commission’s “long-held determination that the RTEP process is fair and open” as discussed further below.⁶

Commission precedent is clear that formula rate proceedings are not the correct forum to collaterally attack a project’s selection or the regional planning process in general; rather, those types of objections should be brought in separate complaints.⁷ OCA acknowledges that Commission precedent forecloses protestor arguments concerning “a lack of competition and the examination of certain alternatives,” but OCA claims that it is permitted to challenge “the underlying inquiry into whether a project is ‘needed to support reliability.’”⁸ PPL, by contrast,

⁵ *Promoting Transmission Inv. Through Pricing Reform*, Order No. 679, 116 FERC ¶ 61,057, at P 58, *order on reh’g*, Order No. 679-A, 117 FERC ¶ 61,345 (2006), *order on reh’g*, 119 FERC ¶ 61,062 (2007).

⁶ *Valley Link Transmission Maryland, LLC*, 191 FERC ¶ 61,113, at P 94 (2025); *see, e.g., id.* P 87 (citing *Potomac Edison Co., L.L.C.*, 189 FERC ¶ 61,161, at P 13 (2024); *Balt. Gas & Elec. Co.*, 187 FERC ¶ 61,030, at P 13 (2024); *PJM Interconnection, L.L.C.*, 185 FERC ¶ 61,200, at P 15 (2023)); *id.* P 90 (“[T]he evidence in the record establishes that stakeholders, including ratepayers, had the opportunity to participate in and provide feedback on the RTEP.”).

⁷ *See, e.g., Valley Link*, 191 FERC ¶ 61,113 at PP 93-94 (“[W]e find Ms. Ghiorzi’s contentions that PJM should have selected a project other than the Amos-Welton Springs-Rocky Point line and that PJM was required to quantify the costs and benefits of the Project Portfolio’s superior transfer capability are outside the scope of this proceeding. Specifically, such arguments go beyond the Commission’s policy, as set forth in Order Nos. 679 and 679-A, of assessing whether a regional transmission planning process was fair and open and evaluated whether the transmission project would enhance reliability and/or reduce congestion when determining whether that project qualifies for the rebuttable presumption.”); *PJM Interconnection, L.L.C.*, 189 FERC ¶ 61,160, at P 18 (2024) (“[C]hallenges to the PJM Tariff cost allocation provisions or the selection of transmission projects included in the PJM RTEP pursuant to the provisions of the PJM Operating Agreement are appropriately raised through separately filed complaints and not through protests to the reports of cost responsibility assignments.”).

⁸ OCA Answer at 11 (“If *Valley Link*’s scope limitation applies to certain arguments about competition and alternatives, it only applies to the fairness and openness inquiry to *qualify* for a rebuttable presumption and *not* to the underlying inquiry into whether a project is ‘needed to support reliability.’”) (emphasis in original).

does not even try to assert that its arguments about the PJM planning process are within the scope of this proceeding. That procedural error is sufficient to reject the arguments made by OCA and PPL, and they are also wrong on the merits.

B. OCA’s Out-of-Scope Attacks on PJM’s Planning Process Do Not Rebut the Company’s Entitlement to the Order No. 679 Presumption

As PJM previously discussed, OCA’s incorrect arguments regarding PJM’s planning assumptions, the scope and timing of the competitive proposal window, and the adequacy of PJM’s informational materials are outside the scope of this proceeding.⁹ OCA nevertheless continues to maintain that those arguments are relevant to its argument that the Order No. 679 rebuttable presumption should not apply.¹⁰ But none of OCA’s arguments actually rebut the applicable presumption. The PJM planning process is “fair and open,” and clearly “*considers and evaluates* projects for reliability,”¹¹ as demonstrated throughout PJM’s extensive planning materials. PPL and OCA may disagree with PJM’s determination that the Kammer Juniata Project is needed for reliability, but that disagreement does not mean the PJM planning process is not fair and open, did not *consider and evaluate* reliability, or that the Company is otherwise not entitled to the rebuttable presumption set forth in Order No. 679.

OCA continues to misunderstand the process set forth in Order No. 679 by which an applicant can demonstrate that it qualifies for incentive rate treatment for transmission projects that satisfy the requirements of Federal Power Act (FPA) section 219; that “the facilities for which it seeks incentives either ensure reliability or reduce the cost of delivered power by reducing

⁹ See PJM Answer at 16-21.

¹⁰ See, e.g., OCA Answer at 3-7.

¹¹ Order No. 679 at P 58 (emphasis added).

transmission congestion.”¹² Specifically, OCA conflates two distinct pathways provided by Order No. 679 to demonstrate that the FPA section 219 requirements have been satisfied. As relevant here, Order No. 679 establishes a rebuttable presumption that the FPA section 219 requirements have been satisfied where “the transmission project results from a fair and open regional planning process that considers and evaluates projects for reliability or congestion and is found to be acceptable to the Commission.”¹³ Separately, where an applicant is unable to satisfy the requirements necessary to invoke the rebuttable presumption, the Commission has explained that the applicant may nevertheless establish entitlement to the requested rate incentives by making an *independent* evidentiary showing that the project is needed for reliability.¹⁴

Thus, the relevant inquiry is whether the Kammer Juniata Project resulted from PJM’s Commission-accepted regional transmission planning process, not whether OCA disagrees with the ultimate reliability need determination. OCA nevertheless attempts to reframe the rebuttable presumption as requiring PJM or the Company to independently prove that the Kammer Juniata Project is needed for reliability.¹⁵ That is incorrect and would effectively collapse the rebuttable presumption into the alternative, reliability need demonstration recognized by Order No. 679.

¹² *Id.* P 76.

¹³ *Id.* P 58.

¹⁴ *See id.* P 57 (“Other applicants not meeting these criteria may nonetheless demonstrate that their project is needed to maintain reliability or reduce congestion by presenting us a factual record that would support such findings.”); *see also* Order No. 679-A at P 41.

¹⁵ *See, e.g.,* OCA Answer at 2 (“the particular circumstances underlying PJM’s reliability determination indicate that it rests on unreliable assumptions”); *id.* at 4 (“PJM and KJT have also failed to affirmatively demonstrate KJT is needed to maintain reliability”); *id.* (“the Commission should deny incentive rate treatment to KJT because no party has shown that this particular project is needed to ensure reliability”); *id.* at 11 (“If *Valley Link*’s scope limitation applies to certain arguments about competition and alternatives, it only applies to the fairness and openness inquiry to *qualify* for a rebuttable presumption and *not* to the underlying inquiry into whether a project is ‘needed to support reliability.’”).

Nor does OCA identify any basis to rebut the presumption here. As PJM explained, the Commission has recently reaffirmed its “long-held”¹⁶ and consistent determination that PJM’s RTEP process is a “fair and open regional planning process that considers and evaluates projects for reliability and/or congestion [that] is ... acceptable to the Commission” for purposes of the rebuttable presumption.¹⁷ Consistent with that framework, PJM conducted an open competitive proposal window, provided notice to stakeholders throughout the process, evaluated 134 proposals from 19 different entities, engaged extensively with stakeholders, and ultimately recommended—and the PJM Board of Managers approved—the inclusion of the Kammer Juniata Project as the more efficient or cost-effective solution to solve identified reliability violations.¹⁸

The sole case OCA cites to support its claim that PJM’s RTEP process was not fair and open—*Great Basin Transmission, LLC*¹⁹—does not support a finding that the rebuttable presumption should not apply here. In *Great Basin*, the Commission denied the rebuttable presumption because that applicant failed to demonstrate that its project had actually been approved through CAISO’s regional planning process.²⁰ Indeed, the Commission emphasized that

¹⁶ See PJM Answer at 2 (citing *Valley Link*, 191 FERC ¶ 61,113 at P 94).

¹⁷ See *id.* at 2-3.

¹⁸ See *id.* at 9-16.

¹⁹ OCA Answer at 10 (citing *Great Basin Transmission, LLC*, 190 FERC ¶ 61,110, at P 38 (2025) (*Great Basin*)).

²⁰ *Great Basin* at P 37 (“Great Basin has not demonstrated that its Project was evaluated under a similar fair and open regional transmission planning process. As Great Basin acknowledges, during CAISO’s 2022-2023 transmission planning process, CAISO recognized ‘potential benefits’ of the Project possibly mitigating California-Oregon Intertie corridor congestion. ***CAISO did not, however, make any definitive findings and instead only recommended continuing its initial assessments.... [T]here is insufficient basis in the record to demonstrate that CAISO fully considered and evaluated Great Basin’s Project for reliability and/or congestion relief through a fair and open regional transmission planning process.***”) (bold and emphasis added); *id.* P 38 (“Great Basin is not entitled to a rebuttable presumption that the Project satisfies the requirements

CAISO was still assessing whether to include the project in its transmission plan, and found the record insufficient to show that the project had been fully considered and approved through the applicable planning framework.²¹ Here, by contrast, there is no dispute that the Kammer Juniata Project was identified, evaluated, and approved through PJM’s Commission-accepted RTEP process. *Great Basin* therefore reinforces—rather than undermines—the conclusion that the rebuttable presumption applies where, as here, a project “results from a fair and open regional planning process that considers and evaluates projects for reliability or congestion and is found to be acceptable to the Commission.”²²

To be clear, PJM does not claim, as OCA suggests, that Order No. 679’s rebuttable presumption can never be overcome.²³ PJM’s point is simply that OCA has not overcome it here for the reasons described in PJM’s Answer. Indeed, OCA’s arguments would effectively eliminate the rebuttable presumption altogether because any stakeholder disagreement regarding assumptions, timing, scope of information, or level of participation could be repackaged as an argument that the planning process was not “fair and open.” That is not the standard established in Order No. 679, nor is it consistent with the Commission’s longstanding recognition that PJM’s RTEP process satisfies the requirements for the rebuttable presumption.

of section 219 because *Great Basin* has not demonstrated that the Project has been approved in a fair and open CAISO regional transmission planning process.”).

²¹ *Great Basin* at P 38 (“We further note that *Great Basin*’s assertion – that the Project has been ‘included’ – is inconsistent with CAISO’s statement that it is still assessing ‘whether to include this project in its transmission plan for purposes of regional cost allocation.’”).

²² Order No. 679 at P 58.

²³ OCA Answer at 12.

C. OCA and PPL's Reliability Claims Fail Even Absent the Order No. 679 Rebuttable Presumption

PPL and OCA are also flat wrong in claiming that the Kammer Juniata Project was not needed for reliability.²⁴ PPL submitted its 4 GW load addition request to PJM late in PJM's RTEP process. As such, PJM was not able to update the additional flowgates associated with adding PPL's load to the 2025 RTEP Window 1 base cases models. However, PJM provided window participants PPL's load modeling (IDV) files to consider while preparing their transmission proposals. The 2030 base case models (used to evaluate conditions up to 2030 and before 2032) did not account for sufficient generation to balance PPL's late-added load. When PJM added PPL's additional load to the 2025 RTEP Window 1 models, that load combined with additional western region generation, caused the need for new flowgates, created a number of un-converged conditions (voltage collapse), and exacerbated the loadings on already overloaded facilities that PJM had previously reported in the 2025 RTEP Window 1 materials. PJM approved the Kammer Juniata Project because it met its reliability needs for both the 2030 and 2032 models and helped address the reliability violations raised by PPL's additional load. PJM provided specific justifications for that approval.²⁵

²⁴ See, e.g., PPL Answer at 5; OCA Answer at 4, 12-14.

²⁵ See *Reliability Analysis Update: 2025 Window 1 Second Read* at 50 (Dec. 8, 2025), <https://www.pjm.com/-/media/DotCom/committees-groups/committees/teac/2025/20251208/20251208-item-11---reliability-analysis-update.pdf>. PJM explained that the Project: (1) provides stronger support to the Mid-Atlantic region in response to load growth in the PPL and MAAC areas in general, delays in OSW development, future generation retirements in MAAC, and any combination of those factors; (2) is a natural expansion of the existing 765 kV backbone into the PJM eastern region, which allows for more flexibility in utilizing resources across the interconnection to serve load; (3) offers ~2 GW more import capability into the Mid-Atlantic region (including Pennsylvania) and preserves existing 500 kV capacity; and (4) offers the highest transfer capability regardless of the future Source/Sink combination evaluated to account for future development scenarios.

Neither PPL nor OCA have argued that the load addressed by the Kammer Juniata Project will not manifest; nor have they identified generation resources that can cover that load in the absence of the Kammer Juniata Project.²⁶ The Kammer Juniata Project was specifically selected because it offered the “highest transfer capability overall among studied transfer scenarios,” and allowed for “adding further capability incrementally while maintaining more efficient or cost-effective orderly development of the transmission system” than seven competing proposals to address the identified reliability need.²⁷ OCA’s arguments that PJM has not demonstrated that the Kammer Juniata Project is necessary for reliability contradict the evidence, and OCA has provided no evidence of its own countering PJM’s correct determination that the line was necessary for reliability.

II. MOTION FOR LEAVE TO ANSWER

The Commission has discretion to accept responses to comments or protests and has routinely done so for good cause shown where accepting the response would either lead to a more complete or accurate record, improve the Commission’s understanding of the issues, clarify disputed or erroneous matters, or help the Commission in its decision-making.²⁸ There is good cause for the Commission to accept PJM’s answer because it corrects misrepresentations made regarding PJM’s conducting of the 2025 RTEP Window 1 process.²⁹

²⁶ See PJM Answer at 39-40.

²⁷ *Reliability Analysis Report: 2025 RTEP Window 1* at 58 (Jan. 23, 2026), <https://www.pjm.com/-/media/DotCom/committees-groups/committees/teac/2026/20260106/20260106-2025-rtep-window-1-reliability-analysis-report.pdf>.

²⁸ 18 C.F.R. § 385.213(a)(2); see, e.g., *PJM Interconnection, L.L.C.*, 158 FERC ¶ 61,133, at P 12 (2017); *KO Transmission Co.*, 156 FERC ¶ 61,147, at n.5 (2016).

²⁹ See, e.g., *Sw. Power Pool, Inc.*, 171 FERC ¶ 63,040, at P 20, *appeal denied*, 172 FERC ¶ 63,008 (2020); *Gulf S. Pipeline Co., LP*, 145 FERC ¶ 61,236, at P 35 (2013), *reh’g denied*, 154 FERC ¶ 61,219 (2016); *Pioneer Transmission, LLC v. N. Ind. Pub. Serv. Co.*, 140 FERC ¶ 61,057, at P 94 (2012).

CONCLUSION

For the aforementioned reasons, the Commission should accept this answer and reject PPL's and OCA's arguments as outside the scope of this proceeding and meritless.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have on this day caused to be served a copy of the foregoing answer upon all parties on the service list in these proceedings in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2025).

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