

the coordination and completion of the Affected System Study process through PJM and LG&E/KU rather than through individual PJM Project Developers.⁵

As a party to the AFS Agreement and administrator of the PJM Tariff that hosts the relevant Affected Systems Coordination procedures, which includes the Affected System Study process PJM Project Developers must follow if an Affected System is identified, PJM has an independent interest in this proceeding that no other party can represent adequately. Accordingly, PJM respectfully requests that the Commission grant this motion to intervene and that PJM be afforded all the rights of a party to this proceeding.

II. COMMENTS IN SUPPORT OF THE AFS AGREEMENT

PJM supports the AFS Agreement and requests the Commission accept the agreement as filed. TC2 entered Phase III on July 8, 2026, and is currently conducting the Phase III System Impact Study.⁶ TC2, Phase III is expected to close on January 4, 2027,⁷ at which time PJM will provide the TC2 Project Developers with a draft interconnection agreement and the results of the System Impact Study, which “will include a final Affected System study, if applicable.”⁸ The results of the Affected System study are necessary so TC2 Project Developers being studied by LG&E/KU have all of the information they need prior to the start of Decision Point III.⁹ To incorporate the results of the Affected System study into the System Impact Study and to provide TC2 Project Developers their draft

⁵ LG&E/KU Filing at 3.

⁶ PJM Interconnection, L.L.C., *Planning / Cycle Timeline*, (July 9, 2026) <https://www.pjm.com/planning/>.

⁷ *Id.*

⁸ Tariff, Part VII, Subpart D, section 312(A)(1)(b), (f).

⁹ The results of the Affected System study is necessary for the calculation of any potential adverse study impact during Decision Point III. Tariff, Part VII, Subpart D, section 313(B)(5)(d).

agreements by the close of Phase III, PJM must have results from LG&E, as the Affected System Operator, well in advance of the close of Phase III.

Before the execution of the AFS Agreement, LG&E/KU was expected to complete its Affected System study by the end of December 2026. This would give PJM only a few Business Days to review and incorporate the results of the Affected System study into the draft interconnection agreements and the System Impact Study. A significant factor that would delay the completion of the Affected System study is the amount of time needed for LG&E/KU to enter into individual Affected System Study agreements with each TC2 Project Developer identified for Affected System studies. PJM and LG&E/KU discussed ways to expedite this aspect of the process to allow PJM the time it will need to review and incorporate the study results while allowing LG&E/KU the time it will need to conduct the studies.

The result of those discussions is the AFS Agreement, which eliminates the need for LG&E/KU to enter into an Affected System study agreement with each PJM Project Developer. Under the AFS Agreement, PJM and LG&E/KU agree to coordinate the transmission of technical data and study deposit so that LG&E/KU may provide the results of the Affected System study expeditiously. The TC2 Project Developers being studied by LG&E/KU have been made aware of the arrangement in the AFS Agreement. Given the current PJM Cycle schedule, LG&E/KU must provide PJM the Affected System study results by the beginning of December 2026,¹⁰ which will give PJM sufficient time to review and incorporate the results into its Phase III System Impact Study and prepare the related interconnection agreements.

¹⁰ As noted in the AFS Agreement, Attachment A, LG&E/KU will be studying 16 TC2 Project Developers.

Tariff, Part VII, Subpart G, section 336 provides that “[i]f an affected system study agreement is required by the Affected System Operator, in order to remain in the relevant Cycle, Project Developer or Eligible Customer shall enter into an affected system study agreement with the Affected System Operator.”¹¹ Because PJM and LG&E/KU have entered into the AFS Agreement, eliminating the need for the individual TC2 Project Developers being studied by LG&E/KU to enter into an Affected System study agreement with LG&E, this provision will not apply to those TC2 Project Developers. However, should the Commission decline to accept the AFS Agreement, the AFS Agreement will be terminated, and LG&E/KU will be required to enter into an Affected System study agreement with each Project Developer. This requirement would take time and likely risk delaying the results of the TC2, Phase III System Impact Study, the close of TC2, Phase III, and the start and close of TC2, Decision Point III, which would impact Cycle 1.¹²

In Order 2023, the Commission, when discussing the Affected System process, encouraged “voluntary coordination between transmission providers who share transmission system seams and whose interconnection customers frequently impact each other’s systems.”¹³ FERC also allowed proposals for alternative arrangements through Joint Operating Agreements or a separate 205 filing.¹⁴ This AFS Agreement is a temporary

¹¹ Tariff, Part VII, Subpart G, section 336(A)(1)(d).

¹² Cycle 1, Phase II cannot begin until TC2, Decision Point III closes. *See* Tariff, Part VIII, Subpart C, section 407(A)(1)(e)(i).

¹³ *Improvements to Generator Interconnection Procedures and Agreements*, Order No. 2023, 184 FERC ¶ 61,054, at P 1172, *limited order on reh’g*, 185 FERC ¶ 61,063 (2023) (“Order 2023”), *order on reh’g & clarification*, Order No. 2023-A, 186 FERC ¶ 61,199 (2024), *appeals pending*, Petition for Review, *Advanced Energy United v. FERC*, Nos. 23-1282, et al. (D.C. Cir. Oct. 6, 2023).

¹⁴ Order No. 2023 at P 1194.

solution, limited to addressing the timing concerns in TC2; however, PJM and LG&E/KU intend to continue working to establish a long-term, permanent solution for future Cycles.¹⁵

III. CONCLUSION

For the reasons set forth above, PJM requests that the Commission accept the AFS Agreement, effective June 30, 2026, to allow the expeditious study of TC2 Project Developers by LG&E.

Respectfully submitted,

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¹⁵ PJM and LG&E/KU have begun discussions regarding potential changes to the Joint Reliability Coordination Agreement Among and Between PJM Interconnection, L.L.C., Tennessee Valley Authority, and Louisville Gas and Electric Company and Kentucky Utilities Company.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated in Audubon, Pennsylvania, this 20th day of July, 2026.

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