UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Consolidated Edison Company of New York, Inc. v. PJM Interconnection, L.L.C.	Docket Nos.	EL15-18-005
Linden VFT, LLC v. PJM Interconnection, L.L.C.		EL15-67-005
Linden VFT, LLC v. PJM Interconnection, L.L.C.		EL17-68-003
PJM Interconnection, L.L.C.		ER17-950-006
		(Not Consolidated)
Neptune Regional Transmission System, LLC and Long Island Power Authority v. PJM Interconnection, L.L.C.		EL21-39-000
PPL Electric Utilities Corporation		ER22-1606-000
PPL Electric Utilities Corporation Neptune Regional Transmission System, LLC Long Island Lighting Co.		ER22-1606-001 (Consolidated)

MOTION FOR LEAVE TO FILE AND LIMITED REPLY COMMENTS OF PJM INTERCONNECTION, L.L.C.

PJM Interconnection, L.L.C. ("PJM") respectfully moves for leave to file and files these limited reply comments[1] addressing comments submitted by Consolidated Edison Company of New York, Inc. ("Con Edison"), Linden VFT, LLC, Hudson Transmission Partners, LLC, and the New York Power Authority (together, "NY Entities") on August 3,

[1] PJM submits this filing pursuant to Rules 212 and 213 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure. 18 C.F.R. §§ 385.212 & .213 (2026). While the Commission's briefing schedule in the Order on Remand did not explicitly permit further comments beyond those specified, PJM seeks leave to file these limited responsive comments to assist the Commission in its decision-making process. *See PJM Interconnection, L.L.C.*, 196 FERC ¶ 61,098, at P 20 (2026) (accepting an answer where it provided the Commission with information that assisted in its decision-making process);*Consol. Edison Co. of N.Y., Inc. v. PJM Interconnection, L.L.C.*, 194 FERC ¶ 61,179 (2026) ("Order on Remand").

2026,[2] in the above-captioned proceedings.[3] In their reply comments, NY Entities again assert that costs of transmission facilities that address short-circuit reliability violations ("Short Circuit Projects")—including for the Bergen-Linden Corridor and Sewaren Projects—should be allocated to the host transmission zone and that the solution-based distribution factor ("DFAX") method is inappropriate. In support, NY Entities point to the PJM Open Access Transmission Tariff ("Tariff") provision directing that circuit breakers costs are assigned to the host zone.[4] As discussed in brief below, NY Entities arguments are misplaced. While PJM agrees that the costs of independently included circuit breakers should continue to be assigned to the host zone in the circumstances specified in the Tariff, it does not follow that a broader transmission solution selected to address short circuit violations should receive the same cost allocation treatment, even where the broader solution includes a circuit breaker.

I. REPLY TO NY ENTITIES' COMMENTS

A. For Short-Circuit Reliability Violations, While Circuit Breakers May Be Allocated to the Host Zone, Transmission Solutions that Increase the Capability of the Grid for the Benefit of All Users Should Be Allocated Via Solution-Based DFAX.

NY Entities allege that costs for transmission solutions "used instead of a replacement circuit breaker . . . should be allocated 100% to the host zone" because "the host zone is the beneficiary of the solution."[5] While the NY Entities are correct that circuit

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[2] *PJM Interconnection, L.L.C.*, Reply Brief of Consolidated Edison Company of New York, Inc., Linden VFT, LLC, Hudson Transmission Partners, LLC, and New York Power Authority, Docket Nos. EL15-18-005, et al. (Aug. 3, 2026) ("NY Entities Reply Comments"). The Indicated PJM Transmission Owners also submitted reply comments. *PJM Interconnection, L.L.C.*, Reply of the Indicated PJM Transmission Owners, Docket Nos. EL15-18-005, et al. (Aug. 3, 2026).

[3] Order on Remand at PP 72-76. All capitalized terms that are not otherwise defined herein have the meaning as set forth in the Tariff.

[4] Tariff, Schedule 12, section (b)(iv)(C).

[5] NY Entities Reply Comments at 10.

breakers are *sometimes* 100% allocated to the host zone, the NY Entities fail to grapple with the Tariff's differing treatment of circuit breakers and the logic underlying those cost allocation approaches.

Tariff, Schedule 12, section (b)(iv)(C) provides two ways that the costs of circuit breakers may be allocated. One, when a circuit breaker is not a part of a larger transmission solution, but rather is *the* transmission solution intended to resolve reliability issues arising from an over-dutied circuit breaker, the costs are allocated 100% to the host transmission zone. This approach is logical given that the benefits will indeed be local because the circuit breaker is acting to *maintain* the existing capability of the transmission system. Two, when a circuit breaker is a part of a larger transmission solution, the circuit breaker is allocated in the same manner as the rest of the transmission solution. This is logical as the larger solution offers much broader benefits, e.g., *increasing* the capability of the transmission system. In this circumstance, costs for circuit breakers are appropriately allocated using the solution-based DFAX method.[6]

The takeaway is that the existing cost allocation rules recognize that costs should be allocated more broadly when the benefit is broader. The fact that a transmission solution addresses a short circuit-related issue does not somehow negate the benefits that it will convey broadly to users on PJM's system. The host zone should not be forced to bear all

[6] *See* Tariff, Schedule 12, Appendix A – 20 Virginia Electric and Power Company, Project b3800.213 ("Cut 500 [kilovolts ("kV")] line No. 558 Brambleton - Goose Creek into Aspen substation. Upgrade 500 kV terminal equipment at Aspen and Goose Creek to 5000A continuous rating current. At Goose Creek, *replace circuit breakers 59582 and 55882*, and associated disconnect switches, breaker leads, bus, and line risers to accommodate 5000A rating" (emphasis added), with a DFAX allocation of Allegheny Power System, Inc. 99.39%, Dominion Energy, Inc. 0.61% (and load-ratio share)); Tariff, Schedule 12, Appendix A – 14 Monongahela Power Company, Project b3800.101 ("502 Junction substation *two 500 kV circuit breaker expansion*" (emphasis added), with a DFAX allocation of Allegheny Power System, Inc. 25.59%, Baltimore Gas and Electric Company 9.79%, Dominion Energy, Inc. 51.94%, Potomac Electric Power Company 12.68% (and load-ratio share)).

the costs of a transmission solution from which entities outside of that zone will also benefit.

B. Transmission Solutions Addressing Short-Circuit Reliability Violations Facilitate the Delivery of Generation to Load, Which is a Benefit Enjoyed Beyond the Host Zone.

Similarly, NY Entities insist that the host zone is the only beneficiary of transmission solutions that resolve short-circuit violations.[7] This is squarely contradicted by the application of the solution-based DFAX method. As PJM explained in its previous comments, "[t]hese short-circuit upgrades facilitate the delivery of generation to load, which is a benefit inherently captured through the solution-based DFAX method."[8] The solution-based DFAX method identifies *all* users that benefit from a transmission solution, and just because a transmission solution was used to resolve a short circuit-related violation does not mean that these measurable benefits cease to exist. Indeed, the increase in transmission capability from the Bergen-Linden Corridor and Sewaren Projects benefited the NY Entities as demonstrated by the solutions-based DFAX method.[9]

[7] *See* NY Entities Reply Comments at 10 ("[T]he fact that transmission projects were used instead of a replacement circuit breaker does not change the fundamental point that the host zone is the beneficiary of the solution, and therefore the costs of such solution should be allocated 100% to the host zone.").

[8] *PJM Interconnection, L.L.C.*, Response of PJM Interconnection, L.L.C. to Paper Hearing Questions, Docket Nos. EL15-18-005, et al., at 6 (June 4, 2026).

[9] For example, prior the termination of Con Edison's long-term firm point-to-point transmission service agreements in 2017, the solutions-based DFAX method (prior to elimination of the de minimis threshold) allocated 82.3% of the costs for the Bergen-Linden Corridor to Con Edison—demonstrating Con Edison placed significant power flows over the new facilities, thus benefitting from the increased transmission capability. *See Consol. Edison Co. of N.Y., Inc.*, Complaint of Consolidated Edison Company of New York, Inc., Docket No. EL15-18-000, at 13 (Nov. 10, 2014).

II. CONCLUSION

PJM respectfully requests that the Commission (i) accept this motion for leave to file these comments and (ii) consider these comments as it evaluates whether the solution-based DFAX method remains a just and reasonable method for allocating costs associated with Short Circuit Projects.

Respectfully submitted,

<u>/s/ Anne Marie Hirschberger</u>

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August 31, 2026

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 at Washington, D.C., this 31st day of August 2026.

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