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Washington, DC 20007
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July 12, 2018

Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: PJM Interconnection, L.L.C. and Ohio Valley Electric Corporation

Docket No. ER18-459-002 (PJM Intra-PJM Tariffs - PJM OATT, OA & RAA)
Docket No. ER18-460-002 (PJM Rate Schedules Tariff - CTOA)

Dear Secretary Bose:

Ohio Valley Electric Corporation (“OVEC”) and PJM Interconnection, L.L.C. (“PJM”) and, together with OVEC, the “Parties”) submit this compliance filing providing the Federal Energy Regulatory Commission (“Commission”) with the effective date for the tariff records accepted in the above-captioned dockets.¹ In accordance with the approvals received by the Commission in the Integration Order, OVEC will integrate into PJM on December 1, 2018. The Parties request an effective date for the tariff sheets approved in the Integration Order of December 1, 2018.

I. Background

On December 16, 2017, the Parties submitted ministerial revisions to the PJM Open Access Transmission Tariff (“PJM Tariff”) and associated agreements necessary to implement the integration of OVEC into the PJM region (the “Revised Tariff Sheets”).² On February 13,

¹ *PJM Interconnection, L.L.C. and Ohio Valley Electric Corp.*, 162 FERC ¶ 61,098 (2018) (the “Integration Order”)

² PJM Interconnection, L.L.C. and Ohio Valley Electric Corp., Tariff Filing, Docket Nos. ER18-459-000 and ER18-460-000 (filed Dec. 15, 2017). The Revised Tariff Sheets consist of revisions to the PJM Tariff, the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. (“OA”), the Reliability Assurance Agreement Among Load Serving Entities in the PJM Region (“RAA”), and the Consolidated Transmission Owners Agreement (“CTOA”). A full list of the Revised Tariff Sheets is attached hereto as Attachment A.

2018, the Commission accepted the filing, granting the requested effective date of March 1, 2018 for each of the Revised Tariff Sheets.³ On February 26, 2018, the Parties submitted a motion to the Commission requesting a delayed effective date for the Revised Tariff Sheets of June 1, 2018, stating that the planned date for OVEC's integration into PJM had been postponed.⁴ On April 17, 2018, the Parties notified the Commission that additional time was needed to allow for integration, requesting that FERC change the effective date of the Revised Tariff Sheets from March 1, 2018 to "12/31/9998", to reflect that the effective date had not yet been decided, and would notify the Commission when the date of integration was determined.⁵ The Commission granted the motion to delay the effective date and granted limited waivers in an order issued July 2, 2018, requesting a compliance filing to provide the effective date and revised tariff sheets no later than 30 days prior to the actual effective date.⁶

II. Requested Effective Date

OVEC and PJM have agreed upon a December 1, 2018 integration date for the OVEC zone. Accordingly, PJM and OVEC request that the Commission accept a December 1, 2018 effective date for the tariff sheets approved in the Integration Order, to allow OVEC to integrate into PJM on that date.

III. Contents of Filing

In addition to this transmittal letter, PJM and OVEC provide the following materials for filing:

- Proposed tariff sheets (as described in Attachment A) in RTF format with metadata attached; and
- Clean and redlined copies of the tariff sections for publishing in eLibrary.

IV. Service

PJM has served a copy of this filing on all existing OVEC customers and PJM Members, and on all state utility regulatory commissions in the PJM Region by posting this filing electronically.

³ *PJM Interconnection, L.L.C. and Ohio Valley Electric Corp.*, 162 FERC ¶ 61,098 (2018).

⁴ *PJM Interconnection, L.L.C. and Ohio Valley Electric Corp.*, Motion for Deferral of Effective Date, Docket Nos. ER18-459-000 and ER18-460-000 (filed Feb. 26, 2018) ("February 26th Motion").

⁵ *PJM Interconnection, L.L.C. and Ohio Valley Electric Corp.*, Letter re: Docket Nos. ER18-459-000 and ER18-460-000 (filed Apr. 17, 2018).

⁶ *PJM Interconnection, L.L.C. and Ohio Valley Electric Corp.*, 164 FERC ¶ 61,004 (2018).

In accordance with the Commission's regulations,⁷ PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: <http://www.pjm.com/documents/ferc-manuals/ferc-filings.aspx> with a specific link to the newly-filed document, and will send an e-mail on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region⁸ alerting them that this filing has been made by PJM and is available by following such link. PJM also serves the parties listed on the Commission's official service list for this docket. If the document is not immediately available by using the referenced link, the document will be available through the referenced link within 24 hours of the filing. Also, a copy of this filing will be available on the Commission's eLibrary website located at the following link: <http://www.ferc.gov/docs-filing/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.⁹

Please contact the undersigned if you have any questions.

Respectfully submitted,

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Suzanne Keppeler
Van Ness Feldman LLP
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Washington, DC 20007
(202) 298-1800
jbn@vnf.com
skeppeler@vnf.com

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New York, NY 10017
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abeller@stblaw.com

Craig Glazer
Vice President - Federal
Government Policy
PJM Interconnection, L.L.C.
1200 G Street, N.W., Suite 600
Washington, DC 20005
(202) 423-4743
Craig.Glazer@pjm.com

Counsel to Ohio Valley Electric
Corporation

Counsel to PJM Interconnection,
L.L.C.

⁷ See 18 C.F.R §§ 35.2(e) and 385.2010(f)(3)(2017).

⁸ PJM already maintains, updates and regularly uses e-mail lists for all PJM Members and affected state commissions.

⁹ *Electronic Tariff Filings*, Order No. 714, FERC Stats. & Regs., Regulations Preambles 2008-2013 ¶ 31,276 (2008).

Attachment A

Revised Tariff Sheets

PJM Tariff

- OATT Table of Contents
- OATT Schedule 1A
- OATT Schedule 7
- OATT Schedule 8
- OATT Schedule 10-NERC
- OATT Schedule 10-RFC
- OATT Attachment C-4
- OATT Attachment H-31
- OATT Attachment J
- OATT Attachment K - Appendix, Section 3.2
- OATT Attachment K - Appendix, Section 7.4
- OATT Attachment L
- OATT Attachment DD, Section 5.10

PJM Operating Agreement

- OA Schedule 1, Section 3.2
- OA Schedule 1, Section 7.4

PJM RAA

- RAA Schedule 10.1
- RAA Schedule 15
- RAA Schedule 17

PJM CTOA

- CTOA Attachment A

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 these proceedings.

Dated at Audubon, PA, this 12th day of July, 2018.

/s/ James M. Burlew
James M. Burlew
Attorney for
PJM Interconnection, L.L.C.

Copy of the Marked and Clean CTOA
Sections Submitted in Docket No.
ER18-460-000

Attachment A

Revisions to the Consolidated Transmission Owners
Agreement

(Marked/Redline Format)

ATTACHMENT A
TO THE CONSOLIDATED
TRANSMISSION OWNERS AGREEMENT

Monongahela Power Company, The Potomac Edison Company and West Penn Power Company, all doing business as Allegheny Power

American Electric Power Service Corporation on behalf of its affiliate companies: AEP Indiana Michigan Transmission Company, AEP Kentucky Transmission Company, AEP Ohio Transmission Company, AEP West Virginia Transmission Company, Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company, Kingsport Power Company, Ohio Power Company and Wheeling Power Company

Commonwealth Edison Company and Commonwealth Edison Company of Indiana, Inc.

Dayton Power and Light Company

Virginia Electric and Power Company (Dominion Virginia Power)

Public Service Electric and Gas Company

PECO Energy Company

PPL Electric Utilities Corporation

Baltimore Gas and Electric Company

Jersey Central Power & Light Company

Potomac Electric Power Company

Atlantic City Electric Company

Delmarva Power & Light Company

UGI Utilities, Inc.

Allegheny Electric Cooperative, Inc.

CED Rock Springs, LLC

Old Dominion Electric Cooperative

Rockland Electric Company

Duquesne Light Company

Neptune Regional Transmission System, LLC

Trans-Allegheny Interstate Line Company

Linden VFT, LLC

American Transmission Systems, Incorporated

City of Cleveland, Department of Public Utilities, Division of Cleveland Public Power

Duke Energy Ohio, Inc.

Duke Energy Kentucky, Inc.

City of Hamilton, OH

Hudson Transmission Partners, LLC

East Kentucky Power Cooperative, Inc.

City of Rochelle

ITC Interconnection LLC

Mid-Atlantic Interstate Transmission, LLC

Southern Maryland Electric Cooperative, Inc.

[Ohio Valley Electric Corporation](#)

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

PJM Interconnection, L.L.C.

By: _____

Name: Phillip G. Harris

Title: President and CEO

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Monongahela Power Company, The Potomac Edison Company and West Penn Power Company, all doing business as Allegheny Power

By: _____

Name: James R. Haney

Title: Vice President

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

American Electric Power Service Corporation on behalf of its affiliate companies:
AEP Indiana Michigan Transmission Company, AEP Kentucky Transmission Company,
AEP Ohio Transmission Company, AEP West Virginia Transmission Company,
Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power
Company, Kingsport Power Company, Ohio Power Company and Wheeling Power
Company

By: _____

Name: Lisa M. Barton

Title: Executive Vice President - AEP Transmission

Date: October 13, 2015

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Exelon Corporation on behalf of its subsidiaries
Commonwealth Edison Company and Commonwealth Edison
Company of Indiana, Inc.

By: _____

Name: Susan Ivey

Title: Vice President, Transmission Operations and Planning, Exelon Corporation

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

The Dayton Power and Light Company

By: _____

Name: Patricia K. Swanke

Title: Vice President - Operations

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Virginia Electric and Power Company (Dominion Virginia Power)

By: _____

Name: Gary L. Sypolt

Title: President – Dominion Transmission

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Public Service Electric and Gas Company

By: _____

Name: Ralph LaRossa

Title: Vice President - Electric Delivery

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Exelon Corporation on behalf of its subsidiary
PECO Energy Company

By: _____

Name: Susan Ivey

Title: Vice President, Transmission Operations and Planning, Exelon Corporation

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

PPL Electric Utilities Corporation

By: _____

Name: John F. Sipics

Title: President

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Baltimore Gas and Electric Company

By: _____

Name: Mark P. Huston

Title: Vice President, Electric Transmission and Distribution

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Jersey Central Power & Light Company

By: _____

Name: Stanley F. Szwed

Title: Vice President – Energy Delivery Policy
First Energy Service Company

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Potomac Electric Power Company

By: _____

Name: David M. Valazquez

Title: Vice President, Pepco Holdings, Inc.

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Atlantic City Electric Company

By: _____

Name: David M. Valazquez

Title: Vice President, Pepco Holdings, Inc.

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Delmarva Power & Light Company

By: _____

Name: David M. Valazquez

Title: Vice President, Pepco Holdings, Inc.

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

UGI Utilities, Inc.

By: _____

Name: Richard E. Gill

Title: Assistant Secretary - Electric Transmission

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

CED Rock Springs, LLC

By: _____

Name:

Title:

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Old Dominion Electric Cooperative

By: _____

Name:

Title:

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Rockland Electric Company

By: _____

Name:

Title:

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Duquesne Light Company

By: _____

Name:

Title:

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Allegheny Electric Cooperative, Inc.

By: _____

Name: Richard W. Osborne

Title: Vice President Power Supply & Engineering

Date: December 15, 2005

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Neptune Regional Transmission System, LLC

By: _____

Name: Edward M. Stern

Title: CEO

Date: March 7, 2007

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Trans-Allegheny Interstate Line Company

By: _____

Name: James R. Haney

Title: Vice President

Date: November 8, 2007

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Linden VFT, LLC

By: _____

Name: Andrew J. Keleman

Title: Authorized Representative

Date: April 1, 2009

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

American Transmission Systems, Incorporated

By: _____

Name: Richard R. Grigg

Title: President

Date: December 17, 2009

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

City of Cleveland, Department of Public Utilities
Division of Cleveland Public Power

By: _____

Name: Barry A. Withers

Title: Director

Date: March 22, 2011

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Duke Energy Ohio, Inc.

By: _____

Name: Julia S. Janson

Title: President

Date: September 27, 2011

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Duke Energy Kentucky, Inc.

By: _____

Name: Julia S. Janson

Title: President

Date: September 27, 2011

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

City of Hamilton, OH

By: _____

Name: Joshua A. Smith

Title: City Manager

Date: February 29, 2012

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Hudson Transmission Partners, L.L.C.

By: _____

Name: Jeffrey T. Wood

Title: Senior Vice President

Date: February 8, 2013

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

East Kentucky Power Cooperative, Inc.

By: _____

Name: Anthony S. Campbell

Title: President & CEO

Date: March 26, 2013

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

City of Rochelle

By: _____

Name: David S. Plyman

Title: City Manager

Date: August 1, 2015

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

ITC Interconnection LLC

By: _____

Name: Terry S. Harvill

Title: Vice President, International and Merchant Development

Date: May 19, 2016

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Mid-Atlantic Interstate Transmission, LLC

By: _____

Name: Richard A. Ziegler

Title: Director, FERC & RTO Technical Support

Date: October 14, 2016

IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Southern Maryland Electric Cooperative, Inc.

By: _____

Name: Austin J. Slater, Jr.

Title: President & CEO

Date: October 19, 2016

Attachment B

Revisions to the Consolidated Transmission Owners
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(Clean Format)

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Division of Cleveland Public Power

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By: _____

Name: Julia S. Janson

Title: President

Date: September 27, 2011

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City of Hamilton, OH

By: _____

Name: Joshua A. Smith

Title: City Manager

Date: February 29, 2012

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Title: Senior Vice President

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By: _____

Name: Anthony S. Campbell

Title: President & CEO

Date: March 26, 2013

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City of Rochelle

By: _____

Name: David S. Plyman

Title: City Manager

Date: August 1, 2015

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ITC Interconnection LLC

By: _____

Name: Terry S. Harvill

Title: Vice President, International and Merchant Development

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Title: President & CEO

Date: October 19, 2016