November 1, 2023

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

Re:  
PJM Interconnection, L.L.C.  
Revisions to PJM OATT, Operating Agreement, and RAA Docket No. ER24-284-000

PJM Interconnection, L.L.C.  
Revisions to PJM CTOA Docket No. ER24-285-000


The purpose of this filing is to revise the PJM Governing Agreements to reflect the fact that, upon the anticipated closing of the Transaction on January 1, 2024, FE PA will own and operate the distribution facilities of Metropolitan Edison Company (“MetEd”), Pennsylvania Electric Company (“Penelec”), West Penn Power Company (“West Penn”), and Pennsylvania Power Company (“Penn Power”) in the MetEd, Penelec, Allegheny Power (“APS”), and ATSI Transmission Zones in PJM, and KATCo will own and operate West Penn transmission assets in the APS Transmission Zone in PJM.

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2 Unless otherwise defined in this letter, a capitalized term shall have the meaning set forth in the PJM Governing Agreements.

3 The Transaction has been approved by the Commission. See FirstEnergy Corp., et al., 184 FERC ¶ 61,094 (2023).

4 The PJM CTOA modifications are filed by PJM on behalf of the PJM Transmission Owners Agreement Administrative Committee. Due to eTariff restrictions, the proposed revisions to the PJM Governing Agreements will be filed separately using the same transmittal letter with specified attachments corresponding to each filing.
FE PA and KATCo anticipate that the Transaction will close on January 1, 2024, but the exact date is not known at this time. Out of an abundance of caution, PJM requests an open-ended effective date for the attached PJM Governing Agreement sections. Thus, a 12/31/9998 effective date is being used for eTariff purposes. FE PA, KATCo and/or PJM will make additional filings with the Commission no later than thirty (30) days after the closing date of the FE PA and KATCo Transaction.

I. BACKGROUND

PJM is a Commission-approved Regional Transmission Organization (“RTO”). PJM is a transmission provider under, and the administrator of, the PJM OATT. As the transmission provider, PJM operates energy and capacity markets, plans regional transmission expansion improvements to maintain grid reliability and relieve congestion, and conducts the day-to-day operations of the transmission system in the PJM region.

FE PA is a newly formed Pennsylvania corporation, and KATCo is a standalone transmission company and wholly owned subsidiary of FirstEnergy incorporated in the Commonwealth of Virginia. The Transaction is a comprehensive internal corporate reorganization that will separate the transmission and distributions functions among MetEd, Penelec, Penn Power, West Penn, KATCo, the Ohio Edison Company, Mid-Atlantic Interstate Transmission, LLC (“MAIT”), FirstEnergy Pennsylvania Holding Company LLC, and FE PA within the Commonwealth of Pennsylvania. Upon consummation of the Transaction, FE PA will own and operate all of the distribution assets previously owned and operated by MetEd, Penelec, West Penn and Penn Power, and KATCo will own and operate the transmission assets previously owned and operated by West Penn in PJM. As a result, FE PA will serve as the singular operating company for FirstEnergy’s distribution utilities in Pennsylvania.

II. DESCRIPTION OF FILING

A. PJM’s Revisions to the PJM OATT, PJM OA, PJM RAA, and PJM CTOA

PJM’s revisions to the PJM OATT, PJM OA, PJM RAA, and PJM CTOA are needed to reflect the fact that, as of the closing date of the Transaction, FE PA will own and operate distribution facilities in the MetEd, Penelec, APS, and ATSI Transmission Zones in PJM, and KATCo will own and operate the transmission facilities in the APS Transmission Zone in PJM. As discussed below, these changes are both nominal and ministerial in that, where needed, they simply remove references to MetEd, Penelec, Penn Power, and West Penn, and add references to FE PA and KATCo, respectively. The revisions do not change any rates, revenue recovery, or cost allocation for the impacted FirstEnergy affiliates.

1. **PJM OATT Revisions**

   a. **PJM OATT, Table of Contents, Attachment H-5, Attachment H-5A, Attachment H-6, and Attachment H-6A**

   PJM is revising the PJM OATT Table of Contents headings for Attachments H-5 and H-5A by replacing the corporate name of MetEd with that of FE PA, which will own and operate distribution facilities in the MetEd Transmission Zone. PJM is also revising the Table of Contents headings for Attachments H-6 and H-6A by replacing the corporate name of Penelec with that of FE PA, which will own and operate distribution facilities in the Penelec Transmission Zone.

   b. **PJM OATT, Table of Contents, Attachment H-11A, Attachment H-34, Attachment H-34A, and Attachment H-34B**

   PJM is revising the PJM OATT Table of Contents headings for Attachment H-11 to add an “H” that was inadvertently omitted so the heading correctly reads “Attachment H-11A.” PJM is also revising the Table of Contents headings to add Attachment H-34 (Keystone Appalachian Transmission Company – Annual Transmission Rate), Attachment H-34A (Keystone Appalachian Transmission Company – Formula Rate Template), and Attachment H-34B (Keystone Appalachian Transmission Company – Formula Rate Implementation Protocols). These additions are to simply reference the existing attachments in the PJM OATT. PJM is not proposing any changes to KATCo’s annual transmission rate, formula rate template, or formula rate implementation protocols in this filing.

   KATCo was established in anticipation of transferring West Penn’s jurisdictional transmission assets to a separate transmission-only entity. In 2020, KATCo proposed revisions to the PJM OATT to implement a formula rate and associated protocols to establish Network Integration Transmission Service (“NITS”) and Transmission Enhancement Charge revenue requirements for transmission service that KATCo expected to provide in the PJM APS Zone, effective January 1, 2021.\(^6\) On May 4, 2023, the Commission accepted KATCo’s Offer of Settlement and Settlement Agreement addressing the true-ups and annual updates of the revenue requirement for the respective rate year included in the settled formula rate template and protocols included in Attachments H-34A and H-34B of the PJM OATT.\(^7\)

   c. **PJM OATT, Attachment H-5**

   Attachment H-5 sets forth the annual transmission rates for MetEd for NITS. PJM is revising Attachment H-5 to replace references to MetEd with FE PA, to reflect that FE PA will own and operate MetEd’s distribution facilities and provide NITS for deliveries that utilize

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distribution facilities at voltage below 69 kilovolts (“kV”) located in the MetEd transmission zone.

d. **PJM OATT, Attachment H-5A**

Attachment H-5A sets forth the rates, or Other Supporting Facilities Charges (“OSFCs”), for deliveries that utilize MetEd’s distribution facilities at voltages below 69 kV. PJM is revising Attachment H-5A to replace references to MetEd with FE PA, to reflect that FE PA will own and operate MetEd’s distribution facilities at voltages below 69 kV in the MetEd Transmission Zone.

e. **PJM OATT, Attachment H-6**

Attachment H-6 sets forth the annual transmission rates for Penelec for NITS. PJM is revising Attachment H-6 to replace references to Penelec with FE PA, to reflect that FE PA will own and operate Penelec’s distribution facilities and provide NITS for deliveries that utilize distribution facilities at voltage below 46 kV located in the Penelec Transmission Zone.

f. **PJM OATT, Attachment H-6A**

Attachment H-6A sets forth the rates, or OSFCs, for deliveries that utilize Penelec’s distribution facilities at voltages below 46 kV. PJM is revising Attachment H-6A to replace references to Penelec with FE PA, to reflect that FE PA will own and operate Penelec’s distribution facilities at voltages below 46 kV in the Penelec Transmission Zone.

g. **PJM OATT, Attachment H-11A**

Attachment H-11A sets forth the OSFC for service at or below 115 kV in the APS Transmission Zone and Formula Rate for NITS for Monongahela Power (“Mon Power”), the Potomac Edison Company (“Potomac Edison”), and West Penn (referred to as the “South FirstEnergy Operating Companies”). PJM is revising references to West Penn as it relates to the OSFC and replacing those references with FE PA. PJM is also revising the heading for the Formula Rate to separate it from the OSFC heading and to create a standalone Formula Rate heading. PJM notes that West Penn remains referenced in the Formula Rate heading in Attachment H-11A solely to ensure the continued effectuation of its formula rate true-ups.

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h. **PJM OATT, Schedule 12 – Appendix and PJM OATT, Schedule 12 – Appendix A**

PJM is revising Schedule 12 – Appendix and Schedule 12 – Appendix A by adding new sections to reflect that KATCo will own and operate West Penn’s transmission assets in the APS Transmission Zone, and will be the transmission owner for purposes of these schedules. In corresponding revisions, PJM is also removing references to West Penn from the headings for the existing Schedule 12 – Appendix and Schedule 12 – Appendix A sections for APS, and removing West Penn’s assets from the existing Schedule 12 – Appendix and Schedule 12 – Appendix A sections, respectively.\(^\text{10}\)

i. **PJM OATT, Attachment H-28B**

Attachment H-28B provides MAIT’s Formula Rate Implementation Protocols. PJM is revising Attachment H-28B to replace a reference to MetEd and Penelec to reflect that FE PA will own and operate all of MetEd and Penelec’s distribution assets and facilities, including ground leases.

j. **PJM OATT, Attachment J**

PJM Transmission Zones are listed in Attachment J to the PJM OATT. PJM is revising Attachment J for the sole purpose of clarifying in footnotes that FE PA is the successor-in-interest to Penelec and MetEd, but all references to the Penelec or MetEd Transmission Zones in the PJM OATT remain unchanged.

k. **PJM OATT, Attachment L**

Transmission Owners in PJM are listed in Attachment L to the PJM OATT. The PJM OATT defines “Transmission Owner” as: “[e]ach entity that owns, leases or otherwise has a possessory interest in facilities used for the transmission of electric energy in interstate commerce under the Tariff.”\(^\text{11}\) KATCo will meet this definition as of the Transaction consummation date. Thus, PJM is revising Attachment L to the PJM OATT by removing the reference to West Penn in the definition of APS and adding KATCo to the list of PJM Transmission Owners.

l. **PJM OATT, Attachment M-1**

The purpose of Attachment M-1 is to provide PJM members serving load in a FirstEnergy Electric Distribution Company (“EDC”) service area an understanding of how each hour of an operating day’s Total Hourly Energy Obligation is developed. PJM is revising

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\(^{10}\) All of West Penn’s transmission assets have been moved to newly-created KATCo tables in Schedule 12 – Appendix and Schedule 12 – Appendix A, respectively. However, those assets built and owned in part by West Penn and in part by Mon Power or Potomac Edison are listed in both the existing Schedule 12 – Appendix and Schedule 12 – Appendix A sections for APS and the new sections for KATCo.

\(^{11}\) PJM OATT, Section 1.45F.
Attachment M-1 to add a reference to FE PA reflecting that it will operate in the ATSI, Penelec, MetEd, and APS PJM Transmission Zones. PJM is also revising Attachment M-1 to replace references to Penn Power, Penelec, MetEd, and West Penn with references to FE PA and the appropriate FirstEnergy EDC service areas.

m. PJM OATT, Attachment M-2

The purpose of Attachment M-2 is to establish procedures and methodologies under which FirstEnergy will determine the Peak Load Contribution and Network Service Peak Load in accordance with the PJM OATT, PJM OA, PJM RAA or other relevant PJM documents each PJM Planning Year for each retail and wholesale LSE serving load in the FirstEnergy EDC’s service areas. PJM is revising Attachment M-2 to add a reference to FE PA reflecting that it will operate in the ATSI, Penelec, MetEd, and APS PJM Transmission Zones. PJM is also revising Attachment M-2 to replace references to Penn Power, Penelec, MetEd, and West Penn with references to FE PA and the appropriate FirstEnergy EDC service areas.

2. PJM OA Revisions

a. PJM OA, Schedule 12

PJM is revising PJM OA, Schedule 12 by including FE PA and KATCo as PJM Members, and removing MetEd, Penelec, Penn Power, and West Penn as PJM Members. FE PA and KATCo signed Schedule 4 of the PJM OA and PJM countersigned, in accordance with Section 11.6(e) of the PJM OA.

3. PJM RAA Revisions

a. PJM RAA, Schedule 15

PJM is revising PJM RAA, Schedule 15 for the sole purpose of clarifying in footnotes that FE PA is the successor-in-interest to Penelec and MetEd, but all references to the Penelec and MetEd Zones in the RAA remain unchanged.

b. PJM RAA, Schedule 17

PJM is revising PJM RAA, Schedule 17 by including FE PA as a party to the RAA, and removing MetEd, Penelec, Penn Power, and West Penn as parties to the RAA.

4. PJM CTOA Revisions

a. Addition of KATCo to List of PJM Transmission Owners

As of the Transaction consummation date, KATCo will be a PJM Transmission Owner because, on that date, the KATCo transmission facilities will: (i) be within the PJM Region; (ii) meet the definition of transmission facilities in Section 1.27 of the PJM CTOA; and (iii) have
been integrated, to the satisfaction of PJM, with the Transmission System of the PJM Region and integrated into the planning and operation of such.\textsuperscript{12}

In preparation for KATCo’s integration on the Transaction consummation date, KATCo has executed the PJM CTOA; and PJM hereby submits for filing, as part of the PJM CTOA, a signature page to the PJM CTOA executed by KATCo. In addition, Attachment A to the PJM CTOA lists the Transmission Owners in the PJM Region.\textsuperscript{13} Therefore, PJM also submits for filing a revised Attachment A to the PJM CTOA removing West Penn from the definition of APS and adding KATCo to the list of PJM Transmission Owners.

III. OTHER RELATED FUTURE FILINGS AND MILESTONES

FE PA, KATCo and/or PJM will make additional filings with the Commission no later than thirty (30) days after the closing date of the FE PA and KATCo Transaction. These additional filings will address modifications to existing service agreements under the PJM OATT that are necessary to reflect the fact that, as of Transaction consummation date, FE PA will own and operate all of distribution facilities previously owned by MetEd, Penelec, West Penn, and Penn Power in the MetEd, Penelec, APS, and ATSI Transmission Zones in PJM, and KATCo will own and operate the former West Penn transmission facilities in the APS Transmission Zone in PJM.

IV. ADDITIONAL INFORMATION

A. Proposed Effective Date and Request for Waivers

FE PA and KATCo anticipate that the Transaction will close on January 1, 2024, but the exact date is not known at this time. Out of an abundance of caution, PJM requests an open-ended effective date for the attached PJM Governing Agreement sections. Thus, a 12/31/9998 effective date is being used for eTariff purposes. FE PA, KATCo and/or PJM will make additional filings with the Commission no later than thirty (30) days after the closing date of the FE PA and KATCo Transaction.

To the extent necessary, PJM requests waiver of the Commission’s notice requirements to allow these changes to become effective on the date the Transaction is consummated. The parties to the Transaction expect the Transaction to close on or about January 1, 2024, and, therefore, request an order by December 29, 2023 to facilitate an orderly closing.

\textsuperscript{12} PJM CTOA, Section 1.27.
\textsuperscript{13} PJM CTOA, Section 1.28.
B. Communications

Please place the names of the following persons on the official service list established by the Secretary in this proceeding:

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

Steven R. Pincus*  
Managing Counsel, Sr. Director 
PJM Interconnection, L.L.C.  
2750 Monroe Blvd  
Audubon, PA 19403-2497  
(610) 666-4370  
steven.pincus@pjm.com  

Morgan E. Parke*  
Associate General Counsel  
Anne M. Rericha  
Attorney V  
FirstEnergy Service Company  
76 S. Main Street  
Akron, OH 44308  
(330) 374-6650  
mparke@firstenergycorp.com  
arericha@firstenergycorp.com  

Nicholas A. Giannasca  
Jonathan A. Namazi*  
Davis Wright Tremaine LLP  
1251 Avenue of the Americas  
21st Floor  
New York, NY 10020  
(212) 603-6406  
nicholasgiannasca@dwt.com  
jonathannamazi@dwt.com  

* Designated to receive service. PJM respectfully requests waiver of Rule 2010 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.2010, to permit more than two individuals to receive service in this proceeding.

C. List of Documents Submitted with Filing

Together with this filing letter, PJM submits the following:

1. Attachment A  Marked Revised PJM CTOA  
2. Attachment B  Clean Revised PJM CTOA
D. Service

PJM has served a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM region by posting this filing electronically. In accordance with the Commission’s regulations, PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: [https://pjm.com/library/filing-order](https://pjm.com/library/filing-order) 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 region, alerting them that this filing has been made by PJM and is available by following such link. 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 FERC’s eLibrary website located at the following link: [http://www.ferc.gov/docs-filing/elibrary.asp](http://www.ferc.gov/docs-filing/elibrary.asp) in accordance with the Commission’s regulations and Order No. 714.

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Steven R Pincus
Steven R. Pincus
Managing Counsel,
Sr. Director
PJM Interconnection, L.L.C.
2750 Monroe Blvd
Audubon, PA 19403-2497
(610) 666-4370
steven.pincus@pjm.com

On Behalf of PJM Interconnection, L.L.C.

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14 See 18 C.F.R. §§ 35.2(e) and 385.2010(f)(3).
15 PJM already maintains, updates and regularly uses e-mail lists for all PJM Members and affected state commissions.
The Honorable Kimberly D. Bose  
November 1, 2023  
Page 10

/s/ Nicholas A. Giannasca  
Nicholas A. Giannasca  
Jonathan A. Namazi  
Davis Wright Tremaine LLP  
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(212) 603-6406  
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Attorney V  
FirstEnergy Service Company  
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Akron, OH 44308  
(330) 374-6650  
mparke@firstenergycorp.com  
arericha@firstenergycorp.com

On Behalf of FirstEnergy Pennsylvania  
Electric Company and Keystone Appalachian  
Transmission Company
Attachment A
Marked CTOA
ATTACHMENT A

TO THE CONSOLIDATED

TRANSMISSION OWNERS AGREEMENT


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.

Essential Power 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.
ITC Interconnection LLC
Mid-Atlantic Interstate Transmission, LLC
Southern Maryland Electric Cooperative, Inc.
Ohio Valley Electric Cooperative
AMP Transmission, LLC
Transsource West Virginia, LLC
Silver Run Electric, LLC
NextEra Energy Transmission MidAtlantic Indiana, Inc.
Wabash Valley Power Association, Inc.
Keystone Appalachian Transmission Company
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, and The Potomac Edison Company, and West Penn Power Company, all doing business as Allegheny Power

By: _____________________________
Name: Olenger L. Pannell
Title: Vice President
Date: [month] [day] [202X] December 15, 2005
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.


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.

Essential Power Rock Springs, LLC

By:_________________________________
Name: Jason Solimini
Title: Vice President Finance, Controller and Treasurer
Date: September 26, 2019
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.

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

Ohio Valley Electric Corporation, Inc.

By:_________________________________
Name: Justin J. Cooper
Title: Secretary, Treasurer, and Chief Financial Officer
Date: November 28, 2018
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

AMP Transmission, LLC

By: ________________________________
Name: Pamala M. Sullivan
Title: President
Date: October 9, 2018
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Transource West Virginia, LLC

By: __________________________
Name: Antonio P. Smyth
Title: President
Date: February 19, 2019
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Silver Run Electric, LLC

By: ___________________________
Name: Paul G. Thessen
Title: President
Date: February 27, 2020
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

NextEra Energy Transmission MidAtlantic Indiana, Inc.

By: ______________________________
Name: Michael Sheehan
Title: Vice President
Date: May 7, 2020
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Wabash Valley Power Association, Inc.

By: _________________________________
Name: Jay Bartlett
Title: Chief Executive Officer
Date: 10/25/19
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Keystone Appalachian Transmission Company

By: _____________________________
Name: Olenger L. Pannell
Title: Vice President
Date: [month] [day], 202X
Attachment B
Clean CTOA
ATTACHMENT A

TO THE CONSOLIDATED

TRANSMISSION OWNERS AGREEMENT

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


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.

Essential Power 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.
ITC Interconnection LLC
Mid-Atlantic Interstate Transmission, LLC
Southern Maryland Electric Cooperative, Inc.
Ohio Valley Electric Cooperative
AMP Transmission, LLC
Transource West Virginia, LLC
Silver Run Electric, LLC
NextEra Energy Transmission MidAtlantic Indiana, Inc.
Wabash Valley Power Association, Inc.
Keystone Appalachian Transmission Company
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 and The Potomac Edison Company, doing business as Allegheny Power

By: _____________________________
Name: Olenger L. Pannell
Title: Vice President
Date: [month] [day] [202X]
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.


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.

Essential Power Rock Springs, LLC

By: ________________________________
Name: Jason Solimini
Title: Vice President Finance, Controller and Treasurer
Date: September 26, 2019
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.

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

Ohio Valley Electric Corporation, Inc.

By:_______________________________
Name: Justin J. Cooper
Title: Secretary, Treasurer, and Chief Financial Officer
Date: November 28, 2018
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

AMP Transmission, LLC

By: _________________________________
Name: Pamala M. Sullivan
Title: President
Date: October 9, 2018
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Transource West Virginia, LLC

By: __________________________
Name: Antonio P. Smyth
Title: President
Date: February 19, 2019
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Silver Run Electric, LLC

By: ____________________________
Name: Paul G. Thessen
Title: President
Date: February 27, 2020
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

NextEra Energy Transmission MidAtlantic Indiana, Inc.

By: _________________________________
Name: Michael Sheehan
Title: Vice President
Date: May 7, 2020
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Wabash Valley Power Association, Inc.

By: _________________________________
Name: Jay Bartlett
Title: Chief Executive Officer
Date: 10/25/19
IN WITNESS WHEREOF, the Parties and PJM have caused this Agreement to be executed by their duly authorized representatives.

Keystone Appalachian Transmission Company

By: _____________________________
Name: Olenger L. Pannell
Title: Vice President
Date: [month] [day], 202X