

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoec.com

December 12, 2025

VIA E-TARIFF

The Honorable Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Proposed Tariff Amendments in Response to Order No. 1920 LTRTP
Requirements
Docket No. ER26-____-000

Dear Secretary Reese:

Pursuant to section 205 of the Federal Power Act (“FPA”), the PJM Transmission Owners (“Transmission Owners” or “TOs”),¹ acting through the PJM Consolidated Transmission Owners Agreement (“CTOA”),² submit an amendment to Attachment M-3 and a new Attachment M-5 of the PJM Interconnection, L.L.C. (“PJM”) Open Access Transmission Tariff (“PJM Tariff”) to comply with the requirements of the Federal Energy Regulatory Commission’s

¹ Pursuant to Order No. 714, this filing is submitted by PJM Interconnection, L.L.C. on behalf of the Transmission Owners as part of an XML filing package that conforms with the Commission’s regulations. PJM has agreed to make all filings on behalf of the PJM Transmission Owners in order to retain administrative control over the PJM Tariff. Thus, the Transmission Owners have requested PJM submit these amendments in the eTariff system as part of PJM’s electronic Intra PJM Tariff.

² PJM Interconnection, L.L.C., Consolidated Transmission Owners Agreement, Rate Schedule F.E.R.C. No. 42 (June 19, 2008). This filing has been authorized pursuant to the individual and weighted voting requirements in Section 8.5 of the Consolidated Transmission Owners Agreement. In addition, pursuant to CTOA, § 7.3.2 and Tariff, §9.1(b), the PJM Transmission Owners consulted with PJM and with members of the PJM Members Committee and other stakeholders by providing notice of the PJM Tariff modifications proposed in this filing, together with a draft of those modifications, on October 30, 2025 and inviting the submission of written comments by December 1, 2025.

(“Commission’s”) Order No. 1920.³ Specifically, the Transmission Owners submit these changes to comply with the requirements regarding the transparency of local transmission planning⁴ and the coordination of regional and local transmission planning processes, including the “right-sizing” requirements.⁵ These local planning requirements in PJM fall within the section 205 FPA filing rights of the Transmission Owners.⁶ The regional planning process falls within the filing rights of PJM. Accordingly, PJM is submitting changes to the PJM Operating Agreement to implement the requirements of Order No. 1920 regarding Long-Term Regional Transmission Planning (“LTRTP”) in a separate filing.⁷

The Transmission Owners request that the Commission find that the proposed amendments to Attachment M-3 and new Attachment M-5 satisfy Order No. 1920’s local planning requirements and accept them without hearing, modification or condition. The Transmission Owners request that the Commission allow these changes to become effective on the same effective date that the Commission accepts the PJM Order No. 1920 Compliance Filing and therefore have entered a placeholder effective date of 12/31/9998.⁸ Once the Commission issues an order on this filing, the Transmission Owners will submit a clean-up filing to enter the actual effective date and to match PJM’s actual effective date for the LTRTP Protocol.

I. INTRODUCTION

Order No. 1920 requires transmission providers to “conduct Long-Term Regional Planning that will ensure the identification, evaluation, and selection, as well as the allocation of the costs, of more efficient or cost-effective regional transmission solutions to address Long-Term Transmission Needs.” The Order also “directs other reforms to ... improve transparency

³ *Bldg. for the Future Through Elec. Reg’l Transmission Planning & Cost Allocation*, Order No. 1920, 187 FERC ¶ 61,068 (2024) (“Order No. 1920,” the “Order,” or the “Final Rule”).

⁴ *Id.* at PP 1625-1630.

⁵ *Id.* at PP 1677-1685.

⁶ CTOA, § 7.3; PJM Tariff, § 9.1.

⁷ Contemporaneous with this filing, PJM is filing, pursuant to section 205 of the FPA, proposed amendments to the PJM Operating Agreement to implement a planning protocol (the “LTRTP Protocol”) to satisfy the requirements of Order No. 1920 (“PJM Order No. 1920 Compliance Filing”).

⁸ The Final Rule required each transmission provider to submit a “compliance filing within ten months of the effective date of this final rule revising its [Tariff] and other document(s) subject to the Commission’s jurisdiction as necessary to demonstrate that it meets all of the requirements adopted in this final rule.” Order No. 1920 at P 12. On December 20, 2024, PJM requested a six-month extension of time to make its compliance filing. PJM Interconnection, L.L.C., Motion for Extension of Time, Docket No. RM21-17, Accession No. 20241220-5512 (filed Dec. 20, 2024). The Commission granted this extension of time making the new compliance filing deadline December 12, 2025. Notice of Extension of Time, Docket No. RM21-17, Accession No. 20250206-3034 (issued Feb. 6, 2025). The Commission also extended the compliance filing deadline for addressing cost allocation required by Order No. 1920 in the PJM region to June 12, 2026, and the TOs will be filing tariff amendments to implement LTRTP cost allocation by that date. Notice of Extension of Time, Docket No. RM21-17, Accession No. 20251017-3020 (issued Oct. 17, 2025).

of local transmission planning processes and coordination between regional and local transmission planning processes.”⁹

Order No. 1920 sets forth two reforms for local planning. Order No. 1920 requires transmission providers to “enhance the transparency of local transmission planning processes; and ... to evaluate whether transmission facilities that need replacing can be ‘right-sized’ to more efficiently or cost-effectively address Long-Term Transmission Needs identified in Long Term Regional Transmission Planning.”¹⁰ To address these requirements, the Transmission Owners propose two changes to the PJM Tariff. First, the Transmission Owners propose a limited change to Attachment M-3. The local planning process in PJM is governed by Attachment M-3 that was most recently amended in 2020 to cover the planning of end-of-life projects.¹¹ Attachment M-3 already contains the requirements identified in Order No. 1920 for enhancing transparency of local transmission planning. Therefore, no changes are necessary to address the transparency requirements. However, a minor change is necessary to specify that PJM has the authority to plan long-term transmission projects.

Second, the Transmission Owners propose a new Attachment M-5 to govern the coordination between local planning and PJM’s new LTRTP process. Attachment M-5 was developed in coordination with PJM’s development of its changes to the Operating Agreement to implement the LTRTP and includes the requirements for “right-sizing” local transmission projects to be included in that LTRTP consistent with the requirements of Order No. 1920. Together, the minor revisions to Attachment M-3 and the new Attachment M-5 satisfy the Transmission Owners’ obligation to bring the PJM Tariff in compliance with the local planning and right-sizing requirements of Order No. 1920.¹²

II. PROPOSED AMENDMENTS

A. Attachment M-3 Requires Minimal Changes to Comply with the Requirements of Order No. 1920.

PJM has a strong, open, and transparent local planning process that has been accepted by the Commission on multiple occasions.¹³ As the Commission has previously found, Attachment

⁹ Order No. 1920 at Summary.

¹⁰ *Id.* at P 1577.

¹¹ *PJM Interconnection, L.L.C.*, 172 FERC ¶ 61,136, at P 88 (2020) (“EOL Order”) (finding that PJM TOs “provide[] PJM and stakeholders with increased opportunities to review and comment . . . and thus provides greater transparency”), *reh’g denied*, 173 FERC ¶ 62,021 (2020).

¹² The minor revisions to Attachment M-3 also correct a typographical error in sections (b)(2) and (b)(3) to format them as separate paragraphs.

¹³ *See, e.g.*, EOL Order at PP 81-87 (2020) (finding Transmission Owners’ filing to amend Attachment M-3 to the PJM Tariff is within the filing rights reserved by the Transmission Owners), *aff’d sub nom. Am. Mun. Power, Inc. v. FERC*, 86 F.4th 922, 927 (D.C. Cir. 2023) (outlining the history of the Attachment M-3 filings); *PJM Interconnection, L.L.C.*, 173 FERC ¶ 61,242 at P 51 (finding that Transmission Owners retain the right to maintain their transmission facilities and generally reserve all rights not specifically granted to PJM).

M-3 “provides for coordination” between the Transmission Owners and PJM and “provides PJM and stakeholders with increased opportunities to review and comment” on needed transmission projects, bringing “greater transparency” to the planning process and well exceeds the requirements of Order No. 890.¹⁴

In addition to review of local projects, referred to as “Supplemental Projects” in PJM, Attachment M-3 includes provisions for review of end-of-life projects that do not meet the definition of Supplemental Projects and are defined as “Asset Management” projects in PJM.¹⁵ Attachment M-3 requires each Transmission Owner to present criteria for new projects and for assessing the need to replace existing transmission facilities for stakeholder input at least annually.¹⁶ The Attachment M-3 process also requires the Transmission Owners to review covered end of useful life projects with stakeholders.¹⁷

The Attachment M-3 process is also well integrated into the regional planning process through the PJM Transmission Expansion Advisory Committee and the three subregional committees, where assumptions, needs, solutions/alternatives, and recommendations are reviewed and vetted with stakeholders. Additionally, PJM actively participates in identifying areas where addressing regional and local needs can be coordinated. Finally, there are extensive procedures to ensure that Transmission Owner local planning is coordinated with PJM to avoid duplication or overlap with regional planning.¹⁸

1. Attachment M-3 Complies with Order No. 1920’s Transparency Requirements for Local Planning.

As noted above, Order No. 1920 adopts requirements for transmission providers to implement to enhance the transparency of their local transmission planning process. Specifically, the Order enhances transparency for three categories of information in the local transmission planning process: (1) the criteria, models, and assumptions used in the process; (2) the local transmission needs that the process identifies; and (3) the potential facilities that the transmission provider will evaluate to address those needs.¹⁹

¹⁴ EOL Order, 172 FERC ¶ 61,136 at P 88.

¹⁵ See *PJM Interconnection, L.L.C.*, 173 FERC ¶ 61,225 at PP 23 (2020) (“Asset Management Projects, as defined by the Attachment M-3 Revisions, are not enhancements of the grid as they merely replace worn out equipment.”) (“Attachment M-3 Order”); PJM Tariff, Attach. M-3 § (b). A Supplemental Project is defined as a “a transmission expansion or enhancement that is not required for compliance with [specified PJM planning criteria].” PJM Operating Agreement, § 1 Definitions, Definitions S – T.

¹⁶ PJM Tariff, Attach. M-3 § (d)(1)(iii).

¹⁷ Attachment M-3 Order, 173 FERC ¶ 61,225 at P 6.

¹⁸ See, e.g., PJM Tariff, Attach. M-4 § (b)(4)(B) (CIP-014 review); Attach. M-3 § (d)(2) (EOL review); see also EOL Order, 172 FERC ¶ 61,136 at P 88 (“Significantly, the proposed revisions provide for coordination of EOL Needs with the PJM RTEP planning criteria needs. This provides PJM and stakeholders with increased opportunities to review and comment on EOL Need transmission projects, and thus provides greater transparency.”).

¹⁹ Order No. 1920 at P 1625.

To accomplish this, the Order requires that transmission providers revise their tariffs to implement a local transmission planning process that includes a series of publicly noticed stakeholder meetings, public posting of information, and opportunities for stakeholder comments.²⁰ Specifically, this must be an iterative process with at least three publicly-noticed stakeholder meetings per regional transmission planning cycle: an Assumptions Meeting, a Needs Meeting, and a Solutions Meeting.²¹ The Needs Meeting must be held within twenty-five days of the Assumption Meeting, and the Solutions Meeting must be held within twenty-five days of the Needs Meeting.²² For each meeting, the meeting materials must be publicly posted no fewer than five calendar days prior to each meeting, with opportunities before and after each meeting for stakeholders to submit comments.²³ After the Solutions Meeting, there must be a period of no fewer than twenty-five days to review and consider stakeholder feedback.²⁴ Finally, the transmission providers must respond to questions or comments from stakeholders.²⁵

Attachment M-3 complies with these requirements. First, Attachment M-3 meets the Order's requirement for at least three publicly noticed stakeholder meetings per regional transmission planning cycle: an Assumptions Meeting, a Needs Meeting, and a Solutions Meeting, each held within twenty-five days of one another. Attachment M-3 section (c) paragraphs 2 – 4 require such meetings on this timeline.²⁶

Second, Attachment M-3 meets the Order's requirements for posting materials. Attachment M-3 (c) (2-4) requires that all meeting materials must be posted publicly no fewer than five calendar days prior to each meeting, with opportunities before and after each meeting for stakeholders to submit comments. Specifically, Attachment M-3 requires the criteria, models, and assumptions to be publicly posted twenty days before the Assumptions Meeting,²⁷ that criteria violations and drivers be posted ten days before the Needs Meeting,²⁸ and that potential solutions be posted 10 days prior to the Solutions Meeting.²⁹ In addition, each Transmission Owner is required to review and consider comments that are received within ten days of each meeting.³⁰

²⁰ *Id.*

²¹ *Id.* at P 1626-27.

²² *Id.*

²³ *Id.* at P 1628.

²⁴ *Id.*

²⁵ *Id.*

²⁶ See PJM Tariff, Attach. M-3 at § (c)(2) (describing the requirements for the “Assumptions Meeting”); § (c)(3) (describing the requirements for the “Needs Meeting”); and § (c)(4) (describing the requirements for the “Solutions Meeting”).

²⁷ Attach. M-3 at § (c)(2).

²⁸ *Id.* at § (c)(3).

²⁹ *Id.* at § (c)(4).

³⁰ *Id.* at § (c)(2-4).

Third, Attachment M-3 requires each Transmission Owner to review and consider each comment and provide feedback as appropriate. Thus, Attachment M-3 satisfies the requirement to respond to questions or comments from stakeholders.

Finally, Attachment M-3 provides an additional opportunity for comments not required by Order No. 1920. Specifically, Attachment M-3 provides that in accordance with section 1.3 of Schedule 6 of the PJM Operating Agreement, stakeholders shall have at least 10 days to comment on the Local Plan after the solutions selected by the Transmission Owner for inclusion in the Local Plan are posted.³¹ Attachment M-3 also provides that each Transmission Owner shall review and consider comments that are received at least 10 days before the Local Plan is submitted for integration into the Regional Transmission Expansion Plan. Thus, Attachment M-3 complies with the requirements for twenty-five days between the Solutions Meeting and the inclusion of the local project in the regional planning process, by providing 10 days to comment on solutions following the Solutions meeting and twenty days before solutions are incorporated into the Local Plan—a total of 30 days.³²

Thus, Attachment M-3 satisfies Order No. 1920's local planning transparency reforms in its current form and requires no amendments to implement the Order's requirements.

2. A Clarifying Amendment to Attachment M-3 Is Necessary to Transfer to PJM the Responsibility to Implement Order No. 1920 Long-Term Regional Transmission Planning.

In addition to addressing the PJM local planning requirements, Attachment M-3 also includes in section (a), a list of planning criteria transferred to PJM by the Transmission Owners. All other planning responsibilities are specifically reserved to the Transmission Owners.³³ To remove any potential doubt that long-term planning under Order No. 1920 is within PJM's planning responsibility, the Transmission Owners propose to amend this list to include such planning responsibility as a new subsection 6 to section (a). Specifically, they propose to add the following:

6. the Long-Term Regional Transmission Planning Protocol set forth in Operating Agreement, Schedule 6-C, provided that the Additional Procedures for Planning Right-Sized Transmission Projects set forth in Tariff, Attachment M-5 also shall apply, as applicable.

While some aspects of PJM's current planning responsibilities under the existing provisions of Attachment M-3, section (a), such as reliability, are also included in the Order No. 1920 required planning criteria, others, such as advancing federal, tribal, state, and local public policies, may be beyond the responsibilities transferred to PJM. This amendment will clarify that long-term transmission planning consistent with PJM's LTRTP Protocol that is being filed concurrently

³¹ PJM Tariff, Attach. M-3 at § (c)(5).

³² Since potential solutions are posted 10 days prior to Solutions Meeting, stakeholders are made aware of proposed solutions at least 40 days prior to their inclusion in the Local Plan.

³³ *Am. Mun. Power*, 86 F.4th 922, 927.

with the instant filing to implement Order No. 1920's planning requirements is within the planning responsibilities transferred to PJM.

B. The New Attachment M-5 Complies with the Commission's "Right-Sizing" and Coordination Requirements.

Order No. 1920 requires transmission providers to develop and implement a process for identifying transmission facilities that can be "right-sized" to more efficiently or cost-effectively address a Long-Term Transmission Need.³⁴ To implement this requirement, the PJM Transmission Owners are proposing a new Attachment M-5, designed to work specifically with the procedures for identifying Right-Sized Replacement Facilities for consideration in the Order No. 1920 LTRTP Protocol. The proposed Attachment M-5 is modelled after the existing local planning provisions addressing overlaps with PJM planned projects set forth in the PJM Tariff, Attachment M-3, section (d).³⁵

Order No. 1920 requires "transmission providers in each transmission planning region to evaluate whether transmission facilities (1) operating above a specified kV threshold and (2) that an individual transmission provider that owns the transmission facility anticipates replacing in-kind with a new transmission facility during the next 10 years can be 'right-sized' to more efficiently or cost-effectively address a Long-Term Transmission Need."³⁶ It further requires that, "sufficiently early in each LTRTP cycle, each transmission provider submit its in-kind replacement estimates (i.e., estimates of the transmission facilities operating at and above the specified kV threshold that an individual transmission provider that owns the transmission facility anticipates replacing in-kind with a new transmission facility during the next 10 years) for use in LTRTP" and "transmission providers must propose on compliance a threshold that does not exceed 200 kV (e.g., 115 kV and above)."³⁷

The new Attachment M-5, *Additional Procedures For Planning Right-Sized Long-Term Transmission Projects*, meets these requirements. As described in section (a), Attachment M-5 applies to right-sizing under PJM's LTRTP Protocol. To meet the requirements of Order No. 1920, Attachment M-5 adopts the following definition for "In-Kind Replacement Facility Need":

1. "In-Kind Replacement Facility Need" shall mean the need to replace a Transmission Facility identified by a Transmission Owner pursuant to this Attachment M-5 that the Transmission Owner anticipates replacing in the next 10 years and that meets the following criteria:

i. is a transmission line operating above 200 kV or a transformer, the high side of which operates above 200 kV and the low side of which is not connected to distribution facilities;

³⁴ Order No. 1920 at P 1677.

³⁵ The procedures set forth in Attachment M-3, § (d) were accepted by the Commission in 2020. See EOL Order, 172 FERC ¶ 61,136 at P 88, Attachment M-3 Order, 173 FERC ¶ 61,225 at PP 42, 50, 60.

³⁶ Order No. 1920 at P 1677.

³⁷ *Id.*

- ii. would result in no more than an Incidental Increase in transmission capacity;
- iii. is located on the Transmission Owner's same general right-of-way or uses/expands an existing right-of-way; and
- iv. if not addressed under this Attachment M-5 would otherwise meet the definition of an Attachment M-3 Project as defined in Tariff, Attachment M-3, section (b)(2).

This definition meets Order No. 1920's requirement that "an 'in-kind replacement transmission facility' is a new transmission facility that: (1) would replace an existing transmission facility that a transmission provider has identified as needing to be replaced; (2) would result in no more than an incidental increase in capacity over the existing transmission facility identified as needing to be replaced; and (3) is located in the same general route as, and/or uses the existing rights-of-way of, the existing transmission facility identified as needing to be replaced."³⁸ This definition also meets Order No. 1920's requirement that the specified kV threshold for potential right-sized facilities does not exceed 200 kV,³⁹ and its requirement that transmission providers identify facilities that may need to be replaced within ten years.⁴⁰

To satisfy the requirement that the "in-kind replacement" list be provided to the Transmission Provider "sufficiently early in the process" Attachment M-5 requires each Transmission Owner to provide its "Candidate In-Kind Replacement Facility Needs List to PJM at the beginning of each LTRTP study cycle. This list will comprise each Transmission Owner's non-binding projection of up to 10 years of In-Kind Replacement Facility Needs. Attachment M-5 also allows each Transmission Owner to update their list as changes necessitate throughout the study cycle.

Consistent with the process approved by the Commission in Attachment M-3, the Candidate In-Kind Replacement Facility Needs List shall remain confidential with PJM during the initial stages of the process.⁴¹ However, once PJM determines that an In-Kind Replacement Facility Need can be more efficiently and cost-effectively addressed by a Right-Sized Replacement Facility, then that In-Kind Replacement Facility Need "shall no longer be considered confidential and may be posted by the Office of the Interconnection on the PJM website pursuant to Operating Agreement, Schedule 6-C, sections 1.8(b) and (d)." This posting occurs prior to the time that PJM opens the proposal by posting the identified Long-Term Transmission Needs.⁴²

³⁸ *Id.* at P 1678.

³⁹ *Id.* at PP 1677, 1683.

⁴⁰ *Id.* at P 1685.

⁴¹ Attach. M-3 at § (d)(1)(iii).

⁴² Schedule 6-C, § 1.8(b), (c). The posting of an In-Kind Replacement Facility Need that can be more efficiently and cost-effectively addressed by a Right-Sized Replacement Facility is for information purposes and does not constitute its selection for inclusion in the Long-Term Plan. *Id.* The consideration of whether to include the Right-Sized Replacement Facility and other proposals to address Long-Term

Consistent with the requirements of Order No. 1920, Attachment M-5 also requires that the Transmission Owner that is the owner of the “existing asset that has been identified and selected to be a Right-Sized Replacement Facility shall be designated to construct and own or finance any facilities identified and selected as a Right-Sized Replacement Facility.”⁴³ This is also consistent with the requirements proposed by PJM in section Schedule 6-C of the Operating Agreement to implement the right-sizing process.⁴⁴

Finally, Attachment M-5 specifies that it may only be modified pursuant to FPA section 205 if such modification is authorized by the PJM Transmission Owners Agreement-Administrative Committee, in accordance with section 8.5 of the CTOA.⁴⁵ This reflects that any changes to Attachment M-5 require a vote of the TOAAC acting in accordance with the CTOA voting requirements. This is consistent with modifications to Attachment M-3 and other provisions of the PJM Tariff that fall within the Transmission Owners’ section 205 filing rights.⁴⁶

Thus, the proposed new Attachment M-5 implements a “right-sizing” process to work in coordination with the proposed LTRTP and satisfies the requirements of Order No. 1920.

III. EFFECTIVE DATE

The Transmission Owners request that the Commission accept the amendment to Attachment M-3 of the PJM Tariff and the new Attachment M-5 to the PJM Tariff without hearing, modification, or condition effective on the effective date that the Commission accepts for PJM’s LTRTP. Contemporaneous with this filing, PJM is filing, pursuant to section 205 of the FPA, proposed amendments to the PJM Operating Agreement to implement the LTRTP Protocol to satisfy the requirements of Order No. 1920. It has entered a placeholder effective date of 12/31/9998 and, once the Commission issues an order on its filing, PJM will submit a clean-up filing to enter the actual effective date. The Transmission Owners respectfully request that such Operating Agreement amendments and the instant amendment to Attachment M-3 and the new Attachment M-5 be given the same effective date, and have likewise entered a placeholder effective date of 12/31/9998. Once the Commission issues an order on its filing, the Transmission Owners will submit a clean-up filing to enter the actual effective date, matching that requested in PJM’s clean-up filing.

Transmission Needs in the recommended Long-Term Regional Transmission Plan is conducted pursuant Schedule 6-C, § 1.9.

⁴³ Attach. M-5 at § (c)(4).

⁴⁴ Schedule 6-C, § 1.7(b).

⁴⁵ Attach. M-5 at § (d).

⁴⁶ See Attach. M-3 at § (e).

IV. CORRESPONDENCE AND COMMUNICATIONS

The PJM Transmission Owners request that all correspondence, pleadings, and other communications concerning this filing be served upon the following:

Michael Batta
FERC Policy Senior Strategic Advisor
Dominion Energy Services, Inc.
120 Tredegar Street
Richmond, VA 23220
(804) 381-1816
michael.batta@dominionenergy.com

William M. Keyser
Megan McDowell
Steptoe LLP
1330 Connecticut Ave, NW
Washington, DC 20036
(202) 429-8186
wkeyser@steptoe.com
mmcdowell@steptoe.com

*Chair of the Transmission Owners
Agreement Administrative Committee*

Cheri Yochelson
Assistant General Counsel
Dominion Energy Services, Inc.
120 Tredegar Street, RS-5
Richmond, VA 23219
(804) 819-2691
cheri.m.yochelson@dominionenergy.com

Donald M. Kaplan
K&L Gates LLP
1601 K Street, NW
Washington, DC 20006
(202) 661-6266
don.kaplan@klgates.com

*Counsel for PPL Electric Utilities
Corporation on behalf of the PJM
Transmission Owners*

*Counsel for Virginia Electric Power
Company (d/b/a Dominion Energy
Virginia)*

V. ADDITIONAL INFORMATION REQUIRED BY REGULATION 35.13(B)

A. Contents of Filing

This filing consists of the following documents:

- The instant Transmittal Letter
- Attachment A: Redlined Tariff Sheet showing proposed amendment to PJM Tariff, Attachment M-3
- Attachment B: Clean Tariff Sheets of proposed amendment to PJM Tariff, Attachment M-3
- Attachment C: Clean Tariff Sheets of Proposed PJM Tariff, Attachment M-5

B. Service

On behalf of the Transmission Owners, 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,⁴⁷ PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: <https://www.pjm.com/library/filing-order>, with a specific link to the newly-filed documents, 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 Region⁴⁸ alerting them that this filing has been made by PJM and is available by following such link. If the documents are not immediately available by using the referenced link, the documents 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.

C. Description of and Reason for Rate Change

A detailed description of the rate change is included in section II above.

D. Agreement Required for Rate Change

The amendment to Attachment M-3 and the new Attachment M-5 have been authorized pursuant to a vote of the TOA-AC pursuant to CTOA § 8.5.1.

E. Request for Waivers

The information submitted with this filing substantially complies with the requirements of Part 35 of the Commission's rules and regulations applicable to filings of this type. To the extent necessary, the Transmission Owners request waiver of the requirement to submit the cost-of service data required by 18 C.F.R. § 35.13. Further, the Transmission Owners request a waiver of any applicable requirement of Part 35 for which a waiver is not specifically requested, if necessary, to permit this filing to become effective as proposed.

⁴⁷ See 18 C.F.R §§ 35.2(e) and 385.2010(f)(3) (2025).

⁴⁸ PJM already maintains, updates, and regularly uses e-mail lists for all PJM members and affected state commissions.

VI. CONCLUSION

For the reasons discussed above and in the attachments to this transmittal, the PJM Transmission Owners submit this filing to implement the requirements of Order No. 1920 and request that the Commission accept the Attachment M-3 amendment and Attachment M-5 as compliant with the local planning and right-sizing requirements of Order No. 1920 without hearing, modification or condition. The Transmission Owners request that the Commission allow these changes to become effective on the effective date that the Commission accepts the PJM Order No. 1920 Compliance Filing and have likewise requested a placeholder effective date of 12/31/9998. Once the Commission issues an order on this filing, the Transmission Owners will submit a clean-up filing to enter the actual effective date.

Sincerely,

/s/ William M. Keyser

William M. Keyser
Megan McDowell
Steptoe LLP
1330 Connecticut Avenue NW
Washington, DC 20036
(202) 429-8186
wkeyser@steptoe.com
mmcdowell@steptoe.com

Donald A. Kaplan
K&L Gates LLP
1601 K Street, N.W.
Washington, DC 20006
(202) 661-6266
don.kaplan@klgates.com

*Counsel for PPL Electric Utilities
Corporation on behalf of the PJM
Transmission Owners*

December 12, 2025

Exhibit A
Redlined Attachment M-3

**ATTACHMENT
M-3
ADDITIONAL PROCEDURES FOR PLANNING
SUPPLEMENTAL PROJECTS AND ASSET MANAGEMENT PROJECTS**

(a) Applicability. Each Transmission Owner shall be responsible for planning and constructing in accordance with Schedule 6 of the Operating Agreement as provided in this Attachment M-3, to the extent applicable, (i) Asset Management Projects, as defined herein, (ii) Supplemental Projects, as defined in section 1.42A.02 of the Operating Agreement, and (iii) any other transmission expansion or enhancement of Transmission Facilities that is not planned by PJM to address one or more of the following planning criteria:

1. NERC Reliability Standards (which includes Applicable Regional Entity reliability standards);
2. Individual Transmission Owner planning criteria as filed in FERC Form No. 715 and posted on the PJM website, provided that the Additional Procedures for the Identification and Planning of EOL Needs, set forth in section (d), shall apply, as applicable;
3. Criteria to address economic constraints in accordance with section 1.5.7 of the Operating Agreement or an agreement listed in Schedule 12-Appendix B;
4. State Agreement Approach expansions or enhancements in accordance with section 1.5.9(a)(ii) of the Operating Agreement; ~~or~~
5. An expansion or enhancement to be addressed by the RTEP Planning Process pursuant to section (d)(2) of this Attachment M-3 in accordance with RTEP Planning Process procedures in Schedule 6 of the Operating Agreement; ~~or~~
6. The Long-Term Regional Transmission Planning Protocol set forth in Operating Agreement, Schedule 6-C, provided that the Additional Procedures for Planning Right-Sized Transmission Projects set forth in Tariff, Attachment M-5 also shall apply, as applicable.

This Attachment M-3 shall not apply to CIP-014 mitigation projects that are subject to Attachment M-4.

(b) Definitions.

1. Asset Management Project. "Asset Management Project" shall mean any modification or replacement of a Transmission Owner's Transmission Facilities that results in no more than an Incidental Increase in transmission capacity undertaken to perform maintenance, repair, and replacement work, to address an EOL Need, or to effect infrastructure security, system reliability, and automation projects the Transmission Owner undertakes to maintain its existing electric transmission system and meet regulatory compliance requirements.

2. Attachment M-3 Project. "Attachment M-3 Project" means (i) an Asset Management Project that affects the connectivity of Transmission Facilities that are included in the Transmission System, affects Transmission Facility ratings or significantly changes the impedance of Transmission Facilities; (ii) a Supplemental Project; or (iii) any other expansion or enhancement of Transmission Facilities that is not excluded from this Attachment M-3 under any of clauses (1) through (5) of section (a). "Attachment M-3 Project" does not include a project to address Form No. 715 EOL Planning Criteria.
3. Incidental Increase. "Incidental Increase" shall mean an increase in transmission capacity achieved by advancements in technology and/or replacements consistent with current Transmission Owner design standards, industry standards, codes, laws or regulations, which is not reasonably severable from an Asset Management Project. A transmission project that results in more than an Incidental Increase in transmission capacity is an expansion or enhancement of Transmission Facilities.
4. Transmission Facilities. "Transmission Facilities" shall have the meaning set forth in the Consolidated Transmission Owners Agreement, section 1.27.
5. EOL Need. "EOL Need" shall mean a need to replace a transmission line between breakers operating at or above 100 kV or a transformer, the high side of which operates at or above 100 kV and the low side of which is not connected to distribution facilities, which the Transmission Owner has determined to be near the end of its useful life, the replacement of which would be an Attachment M-3 Project.
6. Candidate EOL Needs List. "Candidate EOL Needs List" shall have the meaning ascribed to it in section (d)(1)(iii).
7. Form No. 715 EOL Planning Criteria. "Form No. 715 EOL Planning Criteria" shall mean planning criteria filed by a Transmission Owner in FERC Form No. 715 to address EOL Needs. No Transmission Owner may be compelled to file a Form No. 715 EOL Planning Criteria not required to be filed pursuant to FERC regulations applicable to Form No. 715.
8. Attachment M-3 EOL Planning Criteria. "Attachment M-3 EOL Planning Criteria" shall mean planning criteria utilized by a Transmission Owner under Attachment M-3 to address EOL Needs.
9. PJM Planning Criteria Need. "PJM Planning Criteria Need" shall mean a need to plan a transmission expansion or enhancement of Transmission Facilities other than those reserved to each Transmission Owner in accordance with section (a).
10. RTEP Planning Process. "RTEP Planning Process" shall mean the process by which PJM develops the Regional Transmission Expansion Plan under Schedule 6 of the Operating Agreement.

(c) Procedures for Review of Attachment M-3 Projects. The following procedures shall be applicable to the planning of Attachment M-3 Projects:

1. **Review of Attachment M-3 Projects.** As described in sections 1.3(c) and (d) of Schedule 6 of the Operating Agreement, the Subregional RTEP Committees shall be responsible for the review of Attachment M-3 Projects. The Subregional RTEP Committees shall have a meaningful opportunity to participate and provide feedback, including written comments, throughout the transmission planning process for Attachment M-3 Projects. Disputes shall be resolved in accordance with the procedures set forth at Schedule 5 of the Operating Agreement. For purposes of this section (c), reference to the Subregional RTEP Committees shall be deemed to include the Transmission Expansion Advisory Committee (TEAC) when the TEAC reviews Attachment M-3 Projects in accordance with these procedures.
2. **Review of Assumptions and Methodology.** In accordance with sections 1.3(d), 1.5.4(a), and 1.5.6(b) and 1.5.6(c) of Schedule 6 of the Operating Agreement, each Subregional RTEP Committee shall schedule and facilitate a minimum of one Subregional RTEP Committee meeting to review the criteria, assumptions, and models Transmission Owners propose to use to plan and identify Attachment M-3 Projects (Assumptions Meeting). Each Transmission Owner shall provide the criteria, assumptions, and models to PJM for posting at least 20 days in advance of the Assumptions Meeting to provide Subregional RTEP Committee Participants sufficient time to review this information. Stakeholders may provide comments on the criteria, assumptions, and models to the Transmission Owner for consideration either prior to or following the Assumptions Meeting. The Transmission Owner shall review and consider comments that are received within 10 days of the Assumptions Meeting and may respond or provide feedback as appropriate.
3. **Review of System Needs.** No fewer than 25 days after the Assumptions Meeting, each Subregional RTEP Committee shall schedule and facilitate a minimum of one Subregional RTEP Committee meeting per planning cycle to review the identified criteria violations and resulting system needs, if any, that may drive the need for an Attachment M-3 Project (Needs Meeting). Each Transmission Owner will review the identified system needs and the drivers of those needs, based on the application of its criteria, assumptions, and models that it uses to plan Attachment M-3 Projects. The Transmission Owners shall share and post their identified criteria violations and drivers no fewer than 10 days in advance of the Needs Meeting. Stakeholders may provide comments on the criteria violations and drivers to the Transmission Owner for consideration prior to, at, or following the Needs Meeting. The Transmission Owner shall review and consider comments that are received within 10 days of the Needs Meeting and may respond or provide feedback as appropriate.

4. **Review of Potential Solutions.** No fewer than 25 days after the Needs Meeting, each Subregional RTEP Committee shall schedule and facilitate a minimum of one Subregional RTEP Committee meeting per planning cycle to review potential solutions for the identified criteria violations (Solutions Meeting). The Transmission Owners shall share and post their potential solutions, as well as any alternatives identified by the Transmission Owners or stakeholders, no fewer than 10 days in advance of the Solutions Meeting. Stakeholders may provide comments on the potential solutions to the Transmission Owner for consideration either prior to or following the Solutions Meeting. The Transmission Owner shall review and consider comments that are received within 10 days of the meeting and may respond or provide feedback as appropriate.
5. **Submission of Attachment M-3 Projects.** Each Transmission Owner will finalize for submittal to the Transmission Provider Attachment M-3 Projects for inclusion in the Local Plan in accordance with section 1.3 of Schedule 6 of the Operating Agreement and the schedule established by the Transmission Provider. Stakeholders may provide comments on the Attachment M-3 Projects in accordance with section 1.3 of Schedule 6 of the PJM Operating Agreement before the Local Plan is integrated into the Regional Transmission Expansion Plan. Stakeholders shall have at least 10 days to comment on the Local Plan after the solutions selected by the Transmission Owner for inclusion in the Local Plan are posted. Each Transmission Owner shall review and consider comments that are received at least 10 days before the Local Plan is submitted for integration into the Regional Transmission Expansion Plan.
6. **Information Relating to Attachment M-3 Projects.** Information relating to each Transmission Owner's Attachment M-3 Projects will be provided in accordance with, and subject to the limitations set forth in, section 1.5.4 of Schedule 6 of the Operating Agreement. Local Plan Information will be provided to and posted by the Office of Interconnection as set forth in section 1.5.4(e) of Schedule 6 of the Operating Agreement.
7. **No Limitation on Additional Meetings and Communications or Use of Attachment M-3 For Other Transmission Projects.**
 - i. Nothing in this Attachment M-3 precludes any Transmission Owner from agreeing with stakeholders to additional meetings or other communications regarding Attachment M-3 Projects, in addition to the Subregional RTEP Committee process.
 - ii. Nothing in this Attachment M-3 precludes a Transmission Owner from using the procedures set forth in section (c) to solicit stakeholder input in the planning of Transmission Facilities not subject to this section (c) or the RTEP Planning Process.

(d) Additional Procedures for the Identification and Planning of EOL Needs.

1. EOL Need Planning Criteria Documentation and Identification

- i. Each PJM Transmission Owner shall develop documentation for its Attachment M-3 EOL Planning Criteria and/or its Form 715 EOL Planning Criteria through which each identifies EOL Needs.
- ii. Each Transmission Owner's Attachment M-3 EOL Planning Criteria and/or Form 715 EOL Planning Criteria shall be clearly and separately delineated and presented by the Transmission Owner at least once annually pursuant to section (c)(2) and/or in its FERC Form No. 715 at a meeting of the TEAC.
- iii. Annually, each Transmission Owner will provide to PJM a Candidate EOL Needs List comprising its non-public confidential, non-binding projection of up to 5 years of EOL Needs that it has identified under the Transmission Owner's processes for identification of EOL Needs documented under section (d)(1)(i). Each Transmission Owner may change its projection as it deems necessary and will update it annually. Any Candidate EOL Needs List provided to PJM shall remain confidential within PJM, except to the extent necessary for PJM to make the determination referenced in clause (a) of section (d)(2)(ii).

2. Coordination of EOL Needs Planning With PJM Planning Criteria Needs.

- i. If, as part of the RTEP Planning Process, PJM initially determines that a substantial electrical overlap exists such that a single Solution may address a validated PJM Planning Criteria Need(s) identified during the current PJM planning cycle under the RTEP Planning Process and address a projected EOL Need on the Candidate EOL Needs List, which the relevant Transmission Owner has confirmed remains a projected EOL Need, the relevant Transmission Owner shall consult with PJM regarding such potential overlap.
- ii. If, (a) PJM determines through the RTEP Planning Process that a proposed Required Transmission Enhancement would more efficiently and cost-effectively address the identified PJM Planning Criteria Need and may, as well, address the projected EOL Need confirmed under section (d)(2)(i), and (b) the proposed Required Transmission Enhancement is not a solution proposed by the Transmission Owner pursuant to section (c)(4), and (c) the Transmission Owner determines that the projected EOL Need is not met by the proposed Required Transmission Enhancement and determines that it will plan an Attachment M-3 Project to address the projected EOL Need or propose a project to address the Form No. 715 EOL Planning Criteria, the Transmission Owner will provide documentation to PJM and stakeholders on the rationale supporting its

determination at the next appropriate meeting of the TEAC or Subregional RTEP Committee that considered the proposed Required Transmission Enhancement.

- (e) **Modifications.** This Attachment M-3 may only be modified under section 205 of the Federal Power Act if the proposed modification has been authorized by the PJM Transmission Owners Agreement-Administrative Committee in accordance with section 8.5 of the Consolidated Transmission Owners Agreement.

Exhibit B
Clean Attachment M-3

**ATTACHMENT
M-3
ADDITIONAL PROCEDURES FOR PLANNING
SUPPLEMENTAL PROJECTS AND ASSET MANAGEMENT PROJECTS**

(a) Applicability. Each Transmission Owner shall be responsible for planning and constructing in accordance with Schedule 6 of the Operating Agreement as provided in this Attachment M-3, to the extent applicable, (i) Asset Management Projects, as defined herein, (ii) Supplemental Projects, as defined in section 1.42A.02 of the Operating Agreement, and (iii) any other transmission expansion or enhancement of Transmission Facilities that is not planned by PJM to address one or more of the following planning criteria:

1. NERC Reliability Standards (which includes Applicable Regional Entity reliability standards);
2. Individual Transmission Owner planning criteria as filed in FERC Form No. 715 and posted on the PJM website, provided that the Additional Procedures for the Identification and Planning of EOL Needs, set forth in section (d), shall apply, as applicable;
3. Criteria to address economic constraints in accordance with section 1.5.7 of the Operating Agreement or an agreement listed in Schedule 12-Appendix B;
4. State Agreement Approach expansions or enhancements in accordance with section 1.5.9(a)(ii) of the Operating Agreement;
5. An expansion or enhancement to be addressed by the RTEP Planning Process pursuant to section (d)(2) of this Attachment M-3 in accordance with RTEP Planning Process procedures in Schedule 6 of the Operating Agreement; or
6. The Long-Term Regional Transmission Planning Protocol set forth in Operating Agreement, Schedule 6-C, provided that the Additional Procedures for Planning Right-Sized Transmission Projects set forth in Tariff, Attachment M-5 also shall apply, as applicable.

This Attachment M-3 shall not apply to CIP-014 mitigation projects that are subject to Attachment M-4.

(b) Definitions.

1. Asset Management Project. "Asset Management Project" shall mean any modification or replacement of a Transmission Owner's Transmission Facilities that results in no more than an Incidental Increase in transmission capacity undertaken to perform maintenance, repair, and replacement work, to address an EOL Need, or to effect infrastructure security, system reliability, and automation projects the Transmission Owner undertakes to maintain its existing electric transmission system and meet regulatory compliance requirements.

2. Attachment M-3 Project. "Attachment M-3 Project" means (i) an Asset Management Project that affects the connectivity of Transmission Facilities that are included in the Transmission System, affects Transmission Facility ratings or significantly changes the impedance of Transmission Facilities; (ii) a Supplemental Project; or (iii) any other expansion or enhancement of Transmission Facilities that is not excluded from this Attachment M-3 under any of clauses (1) through (5) of section (a). "Attachment M-3 Project" does not include a project to address Form No. 715 EOL Planning Criteria.
3. Incidental Increase. "Incidental Increase" shall mean an increase in transmission capacity achieved by advancements in technology and/or replacements consistent with current Transmission Owner design standards, industry standards, codes, laws or regulations, which is not reasonably severable from an Asset Management Project. A transmission project that results in more than an Incidental Increase in transmission capacity is an expansion or enhancement of Transmission Facilities.
4. Transmission Facilities. "Transmission Facilities" shall have the meaning set forth in the Consolidated Transmission Owners Agreement, section 1.27.
5. EOL Need. "EOL Need" shall mean a need to replace a transmission line between breakers operating at or above 100 kV or a transformer, the high side of which operates at or above 100 kV and the low side of which is not connected to distribution facilities, which the Transmission Owner has determined to be near the end of its useful life, the replacement of which would be an Attachment M-3 Project.
6. Candidate EOL Needs List. "Candidate EOL Needs List" shall have the meaning ascribed to it in section (d)(1)(iii).
7. Form No. 715 EOL Planning Criteria. "Form No. 715 EOL Planning Criteria" shall mean planning criteria filed by a Transmission Owner in FERC Form No. 715 to address EOL Needs. No Transmission Owner may be compelled to file a Form No. 715 EOL Planning Criteria not required to be filed pursuant to FERC regulations applicable to Form No. 715.
8. Attachment M-3 EOL Planning Criteria. "Attachment M-3 EOL Planning Criteria" shall mean planning criteria utilized by a Transmission Owner under Attachment M-3 to address EOL Needs.
9. PJM Planning Criteria Need. "PJM Planning Criteria Need" shall mean a need to plan a transmission expansion or enhancement of Transmission Facilities other than those reserved to each Transmission Owner in accordance with section (a).
10. RTEP Planning Process. "RTEP Planning Process" shall mean the process by which PJM develops the Regional Transmission Expansion Plan under Schedule 6 of the Operating Agreement.

(c) Procedures for Review of Attachment M-3 Projects. The following procedures shall be applicable to the planning of Attachment M-3 Projects:

1. **Review of Attachment M-3 Projects.** As described in sections 1.3(c) and (d) of Schedule 6 of the Operating Agreement, the Subregional RTEP Committees shall be responsible for the review of Attachment M-3 Projects. The Subregional RTEP Committees shall have a meaningful opportunity to participate and provide feedback, including written comments, throughout the transmission planning process for Attachment M-3 Projects. Disputes shall be resolved in accordance with the procedures set forth at Schedule 5 of the Operating Agreement. For purposes of this section (c), reference to the Subregional RTEP Committees shall be deemed to include the Transmission Expansion Advisory Committee (TEAC) when the TEAC reviews Attachment M-3 Projects in accordance with these procedures.
2. **Review of Assumptions and Methodology.** In accordance with sections 1.3(d), 1.5.4(a), and 1.5.6(b) and 1.5.6(c) of Schedule 6 of the Operating Agreement, each Subregional RTEP Committee shall schedule and facilitate a minimum of one Subregional RTEP Committee meeting to review the criteria, assumptions, and models Transmission Owners propose to use to plan and identify Attachment M-3 Projects (Assumptions Meeting). Each Transmission Owner shall provide the criteria, assumptions, and models to PJM for posting at least 20 days in advance of the Assumptions Meeting to provide Subregional RTEP Committee Participants sufficient time to review this information. Stakeholders may provide comments on the criteria, assumptions, and models to the Transmission Owner for consideration either prior to or following the Assumptions Meeting. The Transmission Owner shall review and consider comments that are received within 10 days of the Assumptions Meeting and may respond or provide feedback as appropriate.
3. **Review of System Needs.** No fewer than 25 days after the Assumptions Meeting, each Subregional RTEP Committee shall schedule and facilitate a minimum of one Subregional RTEP Committee meeting per planning cycle to review the identified criteria violations and resulting system needs, if any, that may drive the need for an Attachment M-3 Project (Needs Meeting). Each Transmission Owner will review the identified system needs and the drivers of those needs, based on the application of its criteria, assumptions, and models that it uses to plan Attachment M-3 Projects. The Transmission Owners shall share and post their identified criteria violations and drivers no fewer than 10 days in advance of the Needs Meeting. Stakeholders may provide comments on the criteria violations and drivers to the Transmission Owner for consideration prior to, at, or following the Needs Meeting. The Transmission Owner shall review and consider comments that are received within 10 days of the Needs Meeting and may respond or provide feedback as appropriate.

4. **Review of Potential Solutions.** No fewer than 25 days after the Needs Meeting, each Subregional RTEP Committee shall schedule and facilitate a minimum of one Subregional RTEP Committee meeting per planning cycle to review potential solutions for the identified criteria violations (Solutions Meeting). The Transmission Owners shall share and post their potential solutions, as well as any alternatives identified by the Transmission Owners or stakeholders, no fewer than 10 days in advance of the Solutions Meeting. Stakeholders may provide comments on the potential solutions to the Transmission Owner for consideration either prior to or following the Solutions Meeting. The Transmission Owner shall review and consider comments that are received within 10 days of the meeting and may respond or provide feedback as appropriate.
5. **Submission of Attachment M-3 Projects.** Each Transmission Owner will finalize for submittal to the Transmission Provider Attachment M-3 Projects for inclusion in the Local Plan in accordance with section 1.3 of Schedule 6 of the Operating Agreement and the schedule established by the Transmission Provider. Stakeholders may provide comments on the Attachment M-3 Projects in accordance with section 1.3 of Schedule 6 of the PJM Operating Agreement before the Local Plan is integrated into the Regional Transmission Expansion Plan. Stakeholders shall have at least 10 days to comment on the Local Plan after the solutions selected by the Transmission Owner for inclusion in the Local Plan are posted. Each Transmission Owner shall review and consider comments that are received at least 10 days before the Local Plan is submitted for integration into the Regional Transmission Expansion Plan.
6. **Information Relating to Attachment M-3 Projects.** Information relating to each Transmission Owner's Attachment M-3 Projects will be provided in accordance with, and subject to the limitations set forth in, section 1.5.4 of Schedule 6 of the Operating Agreement. Local Plan Information will be provided to and posted by the Office of Interconnection as set forth in section 1.5.4(e) of Schedule 6 of the Operating Agreement.
7. **No Limitation on Additional Meetings and Communications or Use of Attachment M-3 For Other Transmission Projects.**
 - i. Nothing in this Attachment M-3 precludes any Transmission Owner from agreeing with stakeholders to additional meetings or other communications regarding Attachment M-3 Projects, in addition to the Subregional RTEP Committee process.
 - ii. Nothing in this Attachment M-3 precludes a Transmission Owner from using the procedures set forth in section (c) to solicit stakeholder input in the planning of Transmission Facilities not subject to this section (c) or the RTEP Planning Process.

(d) Additional Procedures for the Identification and Planning of EOL Needs.

1. EOL Need Planning Criteria Documentation and Identification

- i. Each PJM Transmission Owner shall develop documentation for its Attachment M-3 EOL Planning Criteria and/or its Form 715 EOL Planning Criteria through which each identifies EOL Needs.
- ii. Each Transmission Owner's Attachment M-3 EOL Planning Criteria and/or Form 715 EOL Planning Criteria shall be clearly and separately delineated and presented by the Transmission Owner at least once annually pursuant to section (c)(2) and/or in its FERC Form No. 715 at a meeting of the TEAC.
- iii. Annually, each Transmission Owner will provide to PJM a Candidate EOL Needs List comprising its non-public confidential, non-binding projection of up to 5 years of EOL Needs that it has identified under the Transmission Owner's processes for identification of EOL Needs documented under section (d)(1)(i). Each Transmission Owner may change its projection as it deems necessary and will update it annually. Any Candidate EOL Needs List provided to PJM shall remain confidential within PJM, except to the extent necessary for PJM to make the determination referenced in clause (a) of section (d)(2)(ii).

2. Coordination of EOL Needs Planning With PJM Planning Criteria Needs.

- i. If, as part of the RTEP Planning Process, PJM initially determines that a substantial electrical overlap exists such that a single Solution may address a validated PJM Planning Criteria Need(s) identified during the current PJM planning cycle under the RTEP Planning Process and address a projected EOL Need on the Candidate EOL Needs List, which the relevant Transmission Owner has confirmed remains a projected EOL Need, the relevant Transmission Owner shall consult with PJM regarding such potential overlap.
- ii. If, (a) PJM determines through the RTEP Planning Process that a proposed Required Transmission Enhancement would more efficiently and cost-effectively address the identified PJM Planning Criteria Need and may, as well, address the projected EOL Need confirmed under section (d)(2)(i), and (b) the proposed Required Transmission Enhancement is not a solution proposed by the Transmission Owner pursuant to section (c)(4), and (c) the Transmission Owner determines that the projected EOL Need is not met by the proposed Required Transmission Enhancement and determines that it will plan an Attachment M-3 Project to address the projected EOL Need or propose a project to address the Form No. 715 EOL Planning Criteria, the Transmission Owner will provide documentation to PJM and stakeholders on the rationale supporting its

determination at the next appropriate meeting of the TEAC or Subregional RTEP Committee that considered the proposed Required Transmission Enhancement.

- (e) **Modifications.** This Attachment M-3 may only be modified under section 205 of the Federal Power Act if the proposed modification has been authorized by the PJM Transmission Owners Agreement-Administrative Committee in accordance with section 8.5 of the Consolidated Transmission Owners Agreement.

Exhibit C
Clean Attachment M-5

**ATTACHMENT
M-5
ADDITIONAL PROCEDURES FOR PLANNING
RIGHT-SIZED LONG-TERM TRANSMISSION PROJECTS**

(a) Applicability. Each Transmission Owner shall follow the procedures set forth in this Attachment M-5 in coordination with the Office of the Interconnection with respect to the identification of Right-Sized Replacement Facilities for consideration in the planning of Long-Term Transmission Projects. The provisions of this Attachment M-5 do not apply to the identification of Solutions pursuant to the Coordination of EOL Needs Planning With PJM Planning Criteria Needs under Tariff, Attachment M-3, section (d)(2).

(b) Definitions.

1. “In-Kind Replacement Facility Need” shall mean the need to replace a Transmission Facility identified by a Transmission Owner pursuant to this Attachment M-5 that the Transmission Owner anticipates replacing in the next 10 years and that meets the following criteria:
 - i. is a transmission line operating above 200 kV or a transformer, the high side of which operates above 200 kV and the low side of which is not connected to distribution facilities;
 - ii. would result in no more than an Incidental Increase in transmission capacity;
 - iii. is located on the Transmission Owner’s same general right-of-way or uses/expands an existing right-of-way; and
 - iv. if not addressed under this Attachment M-5 would otherwise meet the definition of an Attachment M-3 Project as defined in Tariff, Attachment M-3, section (b)(2).
2. “Incidental Increase” shall have the meaning defined in Tariff, Attachment M-3, section (b)(3).
3. “Right-Sized Replacement Facility” shall have the meaning set forth in Operating Agreement, Schedule 6-C.
4. “Long-Term Transmission Project,” “Long-Term Regional Transmission Plan,” and “Long-Term Transmission Need” shall have the meanings set forth in Operating Agreement, Schedule 6-C.
5. “Transmission Facilities” shall have the meaning set forth in the Consolidated Transmission Owners Agreement, section 1.2.
6. “Candidate In-Kind Replacement Facility Needs List” shall have the meaning ascribed to it in section (c)(1).

7. “Form No. 715 EOL Planning Criteria” shall have the meaning defined in Tariff, Attachment M-3, section (b)(7).

(c) Procedures for identification and consideration of In-Kind Replacement Facility Needs in the Long-Term Regional Transmission Plan.

1. At the beginning of each Long-Term Regional Transmission Plan study cycle, each Transmission Owner shall provide to the Office of the Interconnection a Candidate In-Kind Replacement Facility Needs List comprising its non-public confidential, non-binding projection of up to 10 years of In-Kind Replacement Facility Needs that it has identified pursuant to the Transmission Owner’s processes for identification of In-Kind Replacement Facility Needs. Transmission Owners may update their Candidate In-Kind Replacement Facility Needs List throughout the Long-Term Regional Transmission Plan study cycle and provide to the Office of the Interconnection an explanation for such update(s). Any Candidate In-Kind Replacement Facility Needs List provided to the Office of the Interconnection, including any updates provided during the Long-Term Regional Transmission Plan study cycle, shall remain confidential within PJM, except as provided in this Tariff, Attachment M-5, section (c)(2).
2. An In-Kind Replacement Facility Need, which the Office of the Interconnection determines in accordance with Operating Agreement, Schedule 6-C, sections 1.7(a) and/or 1.8(c)(7)(ii)] can be addressed more efficiently and cost-effectively by a Right-Sized Replacement Facility, shall no longer be considered confidential and may be posted by the Office of the Interconnection on the PJM website pursuant to Operating Agreement, Schedule 6-C, sections 1.8(b) and (d).
3. Upon request by the Office of the Interconnection, the Transmission Owner that identified the In-Kind Replacement Facility Need to be addressed by a Right-Sized Replacement Facility shall consult with the Office of the Interconnection to review or modify an identified Right-Sized Replacement Facility or identify a previously unidentified In-Kind Replacement Facility Need to address a posted Long-Term Regional Transmission Need.
4. Each Transmission Owner that is the owner of the existing asset that has been identified and selected to be a Right-Sized Replacement Facility shall be designated to construct and own or finance any facilities identified and selected as a Right-Sized Replacement Facility pursuant to Consolidated Transmission Owners Agreement, section 4.2.1. Each Transmission Owner so designated shall acknowledge such designation pursuant to Consolidated Transmission Owners Agreement, section 4.2.2.
5. If, (a) the Office of the Interconnection has determined that an In-Kind Replacement Facility Need may be addressed more efficiently and cost-effectively by a Right-Sized Replacement Facility pursuant to Operating Agreement, Schedule 6-C, sections 1.7(a) and/or 1.8(c)(7)(ii), (b) the proposed Right-Sized Replacement Facility is not a solution proposed by the Transmission

Owner, (c) the Transmission Owner determines that the In-Kind Replacement Facility Need will not be met by the proposed Right-Sized Replacement Facility, and (d) the Transmission Owner determines that it will plan and construct an Attachment M-3 Project to address the In-Kind Replacement Facility Need or propose a project to address its Form No. 715 EOL Planning Criteria, the Transmission Owner shall provide documentation to the Office of the Interconnection and stakeholders on the rationale supporting its determination to plan and construct such project at the next appropriate meeting of the Transmission Expansion Advisory Committee.

- (d) Modifications.** This Attachment M-5 may only be modified under section 205 of the Federal Power Act if the proposed modification has been authorized by the PJM Transmission Owners Agreement-Administrative Committee in accordance with section 8.5 of the Consolidated Transmission Owners Agreement.