

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Building for the Future Through Electric)
Regional Transmission Planning and) Docket No. RM21-17-000
Cost Allocation)

COMMENTS OF THE ORGANIZATION OF PJM STATES, INC.

The Organization of PJM States, Inc. (“OPSI”)¹ appreciates this opportunity to clarify that it has not taken a formal position on PJM Interconnection L.L.C.’s (PJM’s) Long-Term Regional Transmission Planning Process (“LTRTP Process”) proposal.² This clarification is necessary because PJM has requested the Federal Energy Regulatory Commission (“Commission”) allow it “to use the PJM LTRTP Process as the foundation for a long-term planning process that achieves the objectives of the Final Rule.”³ Certain statements in this docket and elsewhere may indicate OPSI has formally supported the PJM LTRTP Process. To date, OPSI has not formally issued a position on PJM’s LTRTP Process proposal. This is particularly relevant because PJM recognizes that “the PJM LTRTP Process does not strictly comply with all of the requirements for the Final Rule.”⁴

¹ OPSI’s following members support these comments: the Delaware Public Service Commission, Public Service Commission of the District of Columbia, Illinois Commerce Commission, Indiana Utility Regulatory Commission, Kentucky Public Service Commission, Maryland Public Service Commission, Michigan Public Service Commission, New Jersey Board of Public Utilities, North Carolina Utilities Commission, Pennsylvania Public Utility Commission, Tennessee Public Utility Commission, Virginia State Corporation Commission, and Public Service Commission of West Virginia. The Public Utilities Commission of Ohio abstained in the vote on this filing.

² PJM held five long-term regional transmission planning workshops from July to December 2023 (meeting materials available here: <https://www.pjm.com/committees-and-groups/workshops/ltrtp>.) Following these workshops, PJM reviewed manual changes that describe PJM’s LTRTP Process. The PC endorsed PJM’s manual language, but PJM’s senior committees have not endorsed this manual language. The Markets and Reliability Committee was scheduled to vote on these manual changes in April and June, but both of these votes have been deferred.

³ PJM Interconnection L.L.C. *Request for Rehearing of PJM Interconnection L.L.C.*, Docket No. RM21-17-000 at p. 5 (June 12, 2024) (“PJM Rehearing Request”) (emphasis added).

⁴ *Id.* at p. 5

I. COMMENTS

PJM states that “prior to the issuance of the Final Rule, PJM was at the cusp of finalizing with states and stakeholders an enhanced long-term planning process....”⁵ OPSI appreciates PJM’s efforts to develop a long-term regional transmission planning process, but OPSI has neither formally supported nor opposed the specific transmission planning proposal described in “Attachment A” of PJM’s Rehearing Request.⁶ Therefore, the Commission should not interpret this statement or others that indicate PJM has “discussed” and “engaged” with states in the development of its LTRTP Process proposal to indicate OPSI formally supports PJM’s LTRTP Process.⁷ Since July 2023, OPSI Members and OPSI Staff have followed PJM’s long-term regional transmission planning workshops and subsequent stakeholder process closely, and participated in those workshops, but OPSI as an organization has taken no formal position on the final proposal described in “Attachment A” of PJM’s rehearing request.

Earlier this year, PJM presented its LTRTP Process proposal to the PJM Planning Committee, which endorsed the associated manual revisions. However, neither OPSI nor its individual members vote in the PJM stakeholder process. Before formally revising its manuals, PJM reviews the changes with the relevant Senior Standing Committee and asks for their endorsement. PJM has scheduled votes on its LTRTP Process proposal twice with the relevant Senior Standing Committee, but both votes have been deferred. Consequently, the PJM Markets and Reliability Committee has not voted on this proposal, and PJM has not formally concluded the stakeholder process for this proposal.

⁵ *Id.* at p. 1.

⁶ *Id.* at Attachment A.

⁷ *Id.* at Attachment A at p. 1.

Since OPSI has not issued a statement on PJM’s LTRTP Process Proposal, OPSI encourages the Commission to review OPSI’s previous comments in this docket, which contain its formal positions on long-term regional transmission planning and related issues.

II. CONCLUSION

OPSI appreciates the opportunity to share that it has not taken a formal position on PJM’s LTRTP Process proposal.

Respectfully Submitted,

Gregory V. Carmean
Executive Director
Organization of PJM States, Inc.
700 Barksdale Road, Suite 1
Newark, DE 19711
302-266-0914
greg@opsi.us

Benjamin B. Sloan
Director of Legal and Regulatory Affairs
Organization of PJM States, Inc.
700 Barksdale Road, Suite 1
Newark, DE 19711
601-214-8481
ben@opsi.us

Dated: July 3, 2024

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served in accordance with 18 C.F.R. Section 385.2010 upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Gregory V. Carmean
Gregory V. Carmean
Executive Director
Organization of PJM States, Inc.
700 Barksdale Road, Suite 1
Newark, DE 19711
Tel: 302-266-0914

Dated at Newark, Delaware this July 3, 2024.