# Application of Transource Pennsylvania, LLC for approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection - East and West Projects in portions of York and Franklin Counties, Pennsylvania Docket Nos. A-2017-2640195 \& A-2017-2640200 <br> Petition of Transource Pennsylvania, LLC for a finding that a building to shelter control equipment at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public <br> Docket No. P-2018-3001878 <br> Petition of Transource Pennsylvania, LLC for a finding that a building to shelter control equipment at the Furnace Run Substation in York County, Pennsylvania is reasonably necessary for the convenience or welfare of the public <br> Docket No. P-2018-3001883 <br> Application of Transource Pennsylvania, LLC for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Line associated with the Independence Energy Connection - East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public Docket Nos. A-2018-3001881, et al. 

## SUPPLEMENTAL TESTIMONY INDEX

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Application of Transource Pennsylvania, LLC for approval of the Siting and Construction of the A-2017-2640195 230 kV Transmission Line Associated with the<br>Independence Energy Connection - East and West Projects in portions of York and Franklin Counties, Pennsylvania.<br>Petition of Transource Pennsylvania, LLC<br>for a finding that a building to shelter control equipment P-2018-3001878 at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public.<br>Petition of Transource Pennsylvania, LLC for a finding that a building to shelter control equipment at the Furnace Run Substation in York County, Pennsylvania P-2018-3001883 is reasonably necessary for the convenience or welfare of the public.<br>Application of Transource Pennsylvania, LLC for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Line A-2018-3001881, et al. associated with the Independence Energy Connection East and West Projects as necessary or proper for the service, accommodation. convenience or safety of the public.

# TRANSOURCE PENNSYLVANIA, LLC <br> SUPPLEMENTAL TESTIMONY OF <br> BRIAN D. WEBER <br> IN SUPPORT OF AMENDED APPLICATION <br> TRANSOURCE PA STATEMENT NO. AA-1 

Date: January 29, 2020

## I. INTRODUCTION

Q. Please state your name and business address.
A. My name is Brian D. Weber, and my primary office is located at 1 Riverside Plaza in Columbus, Ohio 43215.
Q. Have you previously provided testimony in this proceeding?
A. Yes. On November 27, 2018, I submitted written rebuttal testimony. In my rebuttal testimony, I adopted the written direct testimony of witness Peggy Simmons, which was filed with Transource Pennsylvania, LLC"s ("Transource PA") Application for approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection - East and West Projects in portions of York and Franklin Counties, Pennsylvania on December 27, 2017. On February 11, 2019, I submitted written rejoinder testimony. I also testified at the evidentiary hearings in this case.
Q. Please describe the purpose of your supplemental testimony.
A. In my supplemental testimony, I will provide an overview of the Amended Application, which is being submitted by Transource PA and PPL Electric Utilities Corporation ("PPL Electric") to propose an alternative configuration of the East Portion of the Independence Energy Connection ("IEC") Project ("Alternative IEC East Portion"). I will describe the alternative configuration for the East Portion of the IEC Project and explain why Transource PA and PPL Electric are filing the Amended Application to propose the Alternative IEC East Portion. My testimony also addresses the following
topics: the continued need for the IEC Project with the Alternative IEC East Portion, a description of the Transource-owned facilities, updated project costs, project maintenance, and agency coordination.
Q. Are you sponsoring any exhibits with your supplemental testimony?
A. Yes. Attached as TPA Exhibit BDW-AA1 is a chart outlining the costs of the Alternative IEC East Portion of the IEC Project.
II. AMENDED APPLICATION
Q. Please describe the Supplemental Attachments being filed with the Amended Application.
A. The Supplemental Attachments to the Amended Application include the following:

- Supplemental Attachment 1: Commission Regulation Cross-Reference Matrix
- Supplemental Attachment 2: Necessity Statement
- Supplemental Attachment 3: Supplemental Siting Analysis
- Supplemental Attachment 4: Engineering Description
- Supplemental Attachment 5: List of Property Owners within the Right-ofWay
- Supplemental Attachment 6: Agency Requirements
- Supplemental Attachment 7: List of Governmental Agencies, Municipalities, and Other Public Entities Receiving the Amended Application
- Supplemental Attachment 8: List of Governmental Agencies, Municipalities, and Other Public Entities Contacted
- Supplemental Attachment 9: List of Public Locations where the Amended Application can be Viewed by the Public
- Supplemental Attachment 10: Design Criteria and Safety
- Supplemental Attachment 11: Vegetation Management
- Supplemental Attachment 12: Agency Coordination
- Supplemental Attachment 13: Public Notice Requirements
Q. Please list Transource PA's other witnesses who are submitting testimony in support of the Amended Application and the topics they will address.
A. Transource PA is submitting supplemental testimony in support of the Amended Application for the following witnesses:
- Steven R. Herling - Mr. Herling, former PJM Vice President of Planning and current Executive Consultant at PJM, will address PJM support for the Amended Application, provide an update on the benefits and cost analysis for the IEC Project, and address the ability of the Alternative IEC East Portion of the IEC Project to meet PJM's regional transmission planning needs.
- Timothy J. Horger - Mr. Horger, PJM`s Director of Energy Market Operations will address PJM's recent market efficiency analyses of the IEC Project, including the Alternative IEC East Portion.

PPL Electric witness Mr. Grossman provides an overview of the PPL Electric witnesses submitting testimony in support of the Amended Application.
Q. Please provide a summary of why Transource PA and PPL Electric are filing the Amended Application to propose the Alterative IEC East Portion.
A. Transource PA has worked diligently throughout this regulatory process to address the concerns raised by parties and other stakeholders in Pennsylvania and Maryland ${ }^{1}$ for the siting of the IEC Project. ${ }^{2}$ Beginning with the initial siting process, Transource has worked collaboratively with interested parties to mitigate the environmental and socioeconomic impacts of the IEC Project. This collaboration did not stop with the filing of the Application, but rather has continued.

In September 2018, a party to the Maryland proceeding, the Power Plant Research Program ("PPRP"), asked Transource to evaluate a number of conceptual alternatives to the IEC East route that would utilize existing transmission infrastructure. Specifically, PPRP proposed that Transource and PJM evaluate the viability of a number of different configurations for the IEC East route using existing transmission corridors that currently contain transmission facilities owned and operated by PPL Electric in Pennsylvania and Baltimore Gas \& Electric ("BGE") in Maryland. Transource worked diligently to engage PJM in conducting detailed reliability and market efficiency studies to evaluate the configurations proposed by PPRP. Although PJM's analysis indicated that certain NERC criteria reliability violations would result if

[^0]PPRP's initially proposed routes were used, Transource and PJM nevertheless determined that one of the conceptual alternatives could be modified to alleviate these NERC reliability violations. Specifically, Transource and PJM modified one of these conceptual alternatives by proposing to add a third transformer to Furnace Run Station. By doing so, this alternative to the IEC East route, which at the time was referred to as "Conceptual Alternative 3A," passed both the reliability tests as well as PJM's market efficiency tests.

Through discussions with the parties, Transource executed settlement agreements with PPL Electric, York County Planning Commission, and Citizens to Stop Transource York County, Maple Lawn Farms, Barron Shaw and Show Orchards (the latter four collectively, "York County Citizens") to propose Conceptual Alternative 3A or the "Alternative IEC East Portion" in an Amended Application. On October 17, 2019, Transource filed the settlement agreements with the Pennsylvania Public Utility Commission ("PA PUC"). ${ }^{3}$

The Amended Application presents the PA PUC with the Alternative IEC East Portion of the IEC Project. The Alternative IEC East Portion addresses the siting concerns raised by interested parties regarding the initially proposed route for the IEC East portion of the Project. Specifically, the Alternative IEC East Portion incorporates the use of existing transmission infrastructure and corridors, while still addressing the congestion that continues to persist. As explained in the supplemental testimony of Mr. Herling, PJM's most recent analysis shows that the benefit-to-cost ratio for the IEC

[^1]Project with the Alternative IEC East Portion has risen to a value of 1.66 using the Companies' updated cost estimates (up from an initial range of $1.39-1.52$, as outlined in witness Horger's supplemental testimony submitted on May 14, 2019). See Transource PA Statement No. AA-2. This 1.66 figure is substantially above the required 1.25 ratio for market efficiency projects. As a result. the Amended Application provides for the construction of transmission enhancements that will provide hundreds of millions of dollars of benefits for customers in the PIM region and also addresses significant emerging reliability issues identified to occur in the near future.
Q. Has the Alternative IEC East Portion proposed in the Amended Application changed from the Conceptual Alternative 3A previously studied?
A. No. Transource PA has simply worked to verify the scope, cost and schedule to implement this alternative route.
Q. What does Transource propose if the PA PUC or MD PSC does not approve the IEC Project as reconfigured by the Alternative East Portion?
A. If the PA PUC or MD PSC does not approve the IEC Project as reconfigured by the Alternative East Portion and the proceedings continue, Transource PA reserves its right to pursue the IEC Project as initially proposed in Transource PA's Application.
Q. Please describe the Alternative East Portion of the IEC Project.
A. The Alternative East Portion of the IEC Project consists of cutting in the existing 230 kV circuits from Otter-Creek to Conastone and Manor to Graceton to the new Furnace Run substation and adding 230 kV circuits from Furnace Run to Conastone and Furnace Run to Graceton utilizing PPL Electric's existing towers and circuits to the extent possible. The Alterative East Portion also adds a 500 kV to 230 kV transformer and associated equipment at the Furnace Run substation. A detailed engineering description of the Alternative East Portion of the IEC Project is provided in Supplemental Attachment 4 to the Amended Application.
Q. If the IEC Project with the Alternative East Portion is approved by the PA PUC and the MD PSC, what transmission facilities will Transource PA own or operate in Pennsylvania related to the IEC East portion of the Project?
A. Transource PA will construct, own and operate the Furnace Run Substation. PPL Electric will construct, own and operate the reconfigured 230 kV lines that are located in Pennsylvania. Transource PA will also construct, own and operate all portions of the IEC West Project that are located in Pennsylvania. BGE will be responsible for a portion of the IEC Project located in Maryland.
Q. Does Transource PA believe that the Alternative IEC East Portion of the IEC Project, as proposed in the Amended Application, will address P.JM's regional transmission planning needs?
A. Yes. As the PA PUC has previously heard from Transource witnesses Herling, Horger, Ali, and Cawley, addressing congestion costs through market efficiency projects is necessary to ensure a properly-functioning-and fair-electricity market, upon which all customers in the PJM region benefit from and rely upon to provide reliable and cconomical supply. Transource, in conjunction with PPL Electric and PJM, have conducted substantial analysis of the Alternative IEC East Portion as proposed in the Amended Application, and have confirmed that this alternative would continue to meet PJM's regional transmission planning criteria. The Alternative IEC East Portion would still address the congestion on the AP South and related constraints within the needed timeframe. Additionally, the Alternative IEC East Portion would still also resolve the emerging reliability issues on the transmission system in southern Pennsylvania and northern Maryland that Project 9A has been projected to resolve, while passing the high bar of the benefit-to-cost ratio of 1.25 required by the PJM planning process.

As the PA PUC previously heard from these witnesses, the consequence of not approving the IEC Project would be that customers in the PJM region would continue to be plagued by economic congestion on the transmission system, as well as the adverse impact of emerging reliability violations.
Q. Has PJM approved the IEC Project with the Alternative East Portion as provided for in the Amended Application?
A. Yes. As discussed in more detail by witness Herling, the PJM Board has approved the IEC Project with the Alternative IEC East Portion, subject to the PA PUC's and the MD PSC's approval of the Project. and subject to written confirmation from Transource
that the Scope of Work set forth in the Designated Entity Agreement will be revised to reflect the configuration of the IEC Project with the Alternative IEC East Portion. Based upon PJM's review of the Alternative IEC East Portion, the IEC Project, as provided for in the Amended Application, would continue to meet PJM's planning criteria. Upon approval of the IEC Project with the Alternative East Portion by the PA PUC and MD PSC, PJM would take necessary action to implement the IEC Project, through an amendment to Transource's Designated Entity Agreement and by designating BGE and PPL Electric as the local incumbent utilities responsible for constructing and operating each of those Companies' portions of the IEC Project.

## Q. Can the IEC Project as proposed in the Amended Application be constructed in time to meet PJM's planning needs?

A. Yes. Transource PA, PPL Electric and BGE anticipate beginning construction activities in the second quarter of 2020 in the event the PA PUC and MD PSC approvals are obtained by that time. The Companies have already begun working with PJM to coordinate and schedule outage time on the lines being upgraded to ensure that construction activities may proceed in a timely fashion. Transource PA and PPL Electric anticipate that construction will take approximately 20 months, therefore, PJM has not raised any concerns regarding a need to extend the in-service date for the Alternative IEC East Portion of the Project to February 2022. The IEC West Portion of the Project is expected to be in service in May 2021.
Q. Have the estimated costs of the Alternative IEC East Portion of the IEC East Project been verified?
A. Yes. Since the time of the evidentiary hearing held in this matter, Transource. PPL Electric and BGE have worked cooperatively to verify the estimated costs for construction of the Alternative IEC East Portion of the IEC Project. The companies estimate the total cost for constructing this alternative to be approximately $\$ 196$ million. See TPA Exhibit BDW-AA1.
Q. What is the status of negotiations with landowners to expand the existing right-ofway for the Alternative East Portion?
A. As stated by PPL Electric witness Weseloh, no condemnation applications are necessary for the Alternative IEC East Portion because PPL Electric was able to acquire all necessary rights from landowners for the Furnace Run corridors prior to the submission of the Amended Application. See PPL Electric Statement No. AA-4.

## IEC West Portion

Q. Does the Amended Application modify the West Portion of the IEC Project in any way?
A. No. The West Portion of the IEC Project is not modified by the Amended Application, and the Amended Application provides for the West Portion of the IEC Project to be constructed as originally sited.
Q. Has Transource PA reached agreements with additional landowners on the IEC

## West Route?

A. Yes. As of January 24, 2020, Transource has successfully negotiated and secured additional Option to Purchase Easement agreements with $65 \%$ of landowners on the IEC West Portion.

## III.CONCLUSION

Q. Please summarize why the PA PUC should approve the Amended Application.
A. Transource is pleased to have worked with stakeholders in Maryland and Pennsylvania to reach a workable compromise to their concerns that not only maximizes the use of existing transmission infrastructure thereby reducing potential social and environmental impacts, but that also addresses the substantial market congestion and reliability issues that PJM is seeking to resolve. As a result of siting the Alternative IEC East Portion of the Project to be within existing transmission corridors, the IEC Project reduces its reliance on greenfield construction and reduces its environmental and socioeconomic footprint. With the IEC Project as modified by the Alternative IEC East Portion, Project 9A will deliver significant market efficiency benefits, while also achieving tangible reliability benefits.
Q. Does this conclude your supplemental testimony?
A. Yes, it does.

## Alternative IEC East Portion Cost Summary

Transource Costs ..... $\$ 125.9 \mathrm{M}$- Furnace Run - Conastone 230 kV double circuit line- Furnace Run Station as a 500 kV GIS / 230 kV station Air Insulated- 500 kV GIS- Insulated

- (8) 500 kV circuit breakers
- (3) $500 / 230 \mathrm{kV}$ transformers
- 230 kV
- (14) circuit breakers to terminate 6 circuits
- (3) $500 / 230 \mathrm{kV}$ transformers
PPL Costs ..... $\$ 37 M^{2}$
- Line upgrades
- Add 2nd Circuit, Furnace Run - Conastone
- Add 2nd Circuit, Furnace Run - Graceton
- New Transmission
- New double circuit, Furnace Run - Conastone 1 \& 2
- New double circuit, Furnace Run - Graceton $1 \& 2$
- New single circuit, Furnace Run - Manor
- New single circuit, Furnace Run - Otter Creek

BGE Costs $\$ 32.8 \mathrm{M}^{3}$

- Line upgrades
- Add 2nd Circuit, Furnace Run - Conastone
- Rebuild Furnace Run - Manor
- Station upgrades
- New circuit breaker Conastone
- New circuit breaker Graceton

Total
$\$ 195.7 \mathrm{M}$

[^2]
## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC

for approval of the Siting and Construction of the A-2017-2640195
230 kV Transmission Line Associated with the
A-2017-2640200
Independence Energy Connection - East and West Projects
in portions of York and Franklin Counties. Pennsylvania.

Petition of Transource Pennsylvania, LLC
for a finding that a building to shelter control equipment
P-2018-3001878
at the Rice Substation in Franklin County, Pennsylvania
is reasonably necessary for the convenience or welfare of the public.

Petition of Transource Pennsylvania, LLC
for a finding that a building to shelter control equipment at the Furnace Run Substation in York County, Pennsylvania P-2018-3001883 is reasonably necessary for the convenience or welfare of the public.

Application of Transource Pennsylvania, LLC
for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Line A-2018-3001881, associated with the Independence Energy Connection East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public.

TRANSOURCE PENNSYLVANIA, LLC<br>SUPPLEMENTAL TESTIMONY OF STEVEN R. HERLING<br>IN SUPPORT OF AMENDED APPLICATION<br>TRANSOURCE PA STATEMENT NO. AA-2

Date: January 29, 2020

## . INTRODUCTION

## Q. Please state your name and business address.

A. My name is Steven R. Herling. I am the former Vice President of Planning for PJM Interconnection, LLC ("PJM") and I am currently an Executive Consultant at P.JM. My business address is 2750 Monroe Boulevard, Audubon, Pennsylvania 19403.
Q. Have you previously provided testimony in this proceeding?
A. Yes. I submitted rebuttal testimony on November 27, 2018 and rejoinder testimony on February 11, 2019. In my rebuttal testimony, I adopted portions of the direct testimony of Paul McGlynn. On May 14, 2019, I submitted supplemental testimony. I also testified at the evidentiary hearing held in this matter.
Q. Please describe the purpose of your supplemental testimony.
A. I am submitting testimony on behalf of Transource Pennsylvania, LLC ("Transource") in support of the Amended Application. In my supplemental testimony, I will explain PJM's intention to take necessary steps to implement the IEC Project, inclusive of the alternative routing of the eastern portion of the IEC Project ("Alternative IEC East Portion"), if approved by the Pennsylvania Public Utility Commission ("PA PUC") and Maryland Public Service Commission ("MD PSC") and explain PJM's authority to do so. Also, I will confirm that the entire IEC Project, inclusive of the Alterantive IEC East Portion, ${ }^{1}$ as described in the Amended Application would continue to meet PJM`s

[^3]long-term regional transmission planning needs which, among other issues, includes PJM's FERC mandate to address persistent economic congestion adversely impacting PJM's regional transmission system.
Q. Are you sponsoring any exhibits with your supplemental testimony?
A. Yes. 1 am sponsoring the following exhibits:

- TPA Exhibit SRH-AA1: December 4, 2019 PJM Board Resolution
- TPA Exhibit SRH-AA2: PJM Whitepaper, December 2019 Baseline Market Efficiency Recommendations (Dec. 3, 2019)


## II. PJM SUPPORTS THE IEC PROJECT INCLUSIVE OF THE ALTERNATIVE IEC EAST PORTION

Q. Has PJM reviewed the Amended Application and its description of the Alternative IEC East Portion of the IEC Project?
A. Yes. The Alternative IEC East Portion of the IEC Project is essentially the same configuration that was described and set forth in my May 14, 2019 supplemental testimony, Statement No. 7-SUPP. as "Conceptual Alternative 3A."
Q. Has the IEC Project inclusive of the Alternative IEC East Portion been presented to stakeholders and the PJM Board?
A. Yes. In November 2019, the Alternative IEC East Portion of the IEC Project was presented during a Transmission Expansion Advisory Committee ("TEAC") meeting for informational purposes to inform stakeholders and market participants of the

[^4]modifications. See TPA Ex. TJH-AA1. Thereafter, the IEC Project inclusive of the Alternative IEC East Portion was presented to the PJM Board for its consideration. The Alternative IEC East Portion of the IEC Project was also described in detail in a Whitepaper submitted by PJM to the PJM Board on December 3, 2019 (at pages 8-9) and is attached to my testimony as TPA Ex. SRH-AA2.
Q. What is PJM's position on the Alternative IEC East Portion of the IEC Project as presented in the Amended Application?
A. The PJM Board reviewed and approved for inclusion in the Regional Transmission Expansion Plan ("RTEP") the IEC Project inclusive of the Alternative IEC East Portion, subject to the PA PUC's and MD PSC's approval, and subject to written confirmation from Transource that the Scope of Work set forth in the Designated Entity Agreement will be revised to reflect the configuration of the IEC Project with the Alternative IEC East Portion. See TPA Ex. SRH-AA1 (Dec. 4, 2019 PJM Board Resolution).
Q. If the Amended Application is approved by the PA PUC and MD PSC, would PJM take action to implement the Alternative IEC East Portion of the IEC Project?
A. Yes. If the IEC Project with the Alternative East Portion is approved by the PA PUC and MD PSC, PJM will take the steps necessary to implement the project consistent with the state commission's orders.

## Q. Does PJM's planning process allow for modifications to PJM-approved projects?

A. Yes. PJM respects the states' roles in the siting process. If a state regulatory authority, such as the PA PUC, requires an alternative route of a project, PJM will accommodate the alternative route so long as it comports with PJM's RTEP process as set forth in Schedule 6 of the Amended and Restated Operating Agreement of PJM Interconnection, LLC and the pro forma designated entity agreement as set forth in PJM's Open Access Transmission Tariff, Attachment KK. These documents contemplate the fact that projects approved through PJM's RTEP process may need to be modified from time to time, including to comply with state regulatory approvals. For example, Schedule 6, § 1.7 of PJM's Operating Agreement acknowledges that a designated entity's obligation to construct PJM-approved upgrades is "[s]ubject to the requirements of applicable law, government regulations and approvals, including, without limitation, requirements to obtain necessary state or local siting, construction and operating permits."

Further, under the terms of Transource's Designated Entity Agreement with PJM (§ 4.3.0), modifications may be made to Transource's scope of work where such a modification is directed by the PA PUC and accords with PJM's planning process. More specifically, § 4.3 .0 of the Designated Entity Agreement provides that " $\mathrm{t} \mid \mathrm{lh}$ Scope of Work and Development Schedule, including the milestones therein, may be revised, as required, in accordance with Transmission Provider's project modification process set forth in the PJM Manuals, or otherwise by Transmission Provider in writing." Section 6.1.3.3 of PJM Manual 14C further contemplates a non-exhaustive list of "typical situations" under which the Designated Entity may initiate the project
modification process. This non-exhaustive list of scenarios includes where there is a "[s]ignificant routing change from what has been proposed", or there are "[a]djustments to where a line terminates within a substation", or there are " $[s]$ ignificant electrical parameter changes[.]" The PA PUC may direct such modifications.

Indeed, Project 9A has already been modified several times to accommodate changes in the proposed conductors and changes to the in-service date. Those changes were memorialized as amendments to Transource's Designated Entity Agreement. PJM also updated the modified specifications for Project 9A in PJM's RTEP for planning and interconnection modeling purposes.
Q. If the PA PUC approves the IEC Project inclusive of the Alternative IEC East Portion, as proposed in the Amended Application, what action would P.JM take to implement the Project?
A. First, PJM would update the RTEP to reflect the modifications to the Project. PJM`s Operating Agreement provides that the Transmission Owner is required to be the Designated Entity for a project to be located on a Transmission Owner's existing right of way if the project would alter the Transmission Owner's use and control of its existing right of way under state law. See Schedule 6, Section 1.5.8(a)(iv). In addition, under the Consolidated Transmission Owners Agreement, the Transmission Owners in PIM have agreed to expand or modify their transmission facilities if directed to do so by PJM. Because portions of the Alternative IEC East Portion of the IEC Project would be constructed within PPL Electric's and BGE's existing right of way, if the PA PUC approves the IEC Project as proposed in the Amended Application, P.JM would
direct the incumbent Transmission Owners (PPL Electric in Pennsylvania and BGE in Maryland) to construct the project facilities on their respective rights of way.

Lastly, if the IEC Project inclusive of the proposed Alternative IEC Portion is approved by the PA PUC and MD PSC, Transource's Designated Entity Agreement will be amended to reflect the alternative scope of Transource's work.
Q. Docs PJM have experience incorporating alternative configurations into PJM Board-approved projects as a result of state regulatory settlements?
A. Yes, there are a number of examples of projects undergoing reconfigurations during state regulatory processes after they have been approved by PJM, which were then integrated into the RTEP under the project's alternative configuration. If a state regulatory authority, such as the PA PUC, requires an alternative configuration, PJM will accommodate the alternative configuration so long as it still addresses the needs for which the original project was approved and satisfies all other requirements set forth in the PJM governing documents. For example, in West Virginia, Transource West Virginia, LLC ("Transource WV") was the Designated Entity to construct new transmission lines and switching stations in West Virginia, referred to as the "Thorofare Project." During the course of the West Virginia Public Service Commission's review of the Thorofare Project, Transource WV reached a settlement with parties to the case that involved expanding the scope of the project and modifying the route of the new transmission lines. After the West Virginia Public Service Commission approved the settlement, PJM took necessary steps (similar to those described above) to update the RTEP to reflect the modifications to the project.

## III. THE PROJECT INCLUSIVE OF THE ALTERNATIVE IEC EAST PORTION CONTINUES TO RESULT IN AN OVERALL PRO.JECT THAT BENEFITS THE SYSTEM

Q. Has PJM determined whether the Alternative IEC East Portion that is the subject of the Amended Application would continue to meet PJM's planning criteria needs?
A. Yes. As I mentioned above, the Amended Application incorporates a version of the Alternative IEC East Portion that was previously studied and analyzed by PJM, thenknown as "Conceptual Alternative 3A." The results of PJM's analysis of the IEC Project inclusive of the Alternative IEC East Portion, which were provided to PA PUC in my May 14, 2019 supplemental testimony and the May 14, 2019 supplemental testimony of witness Timothy Horger, demonstrated that the IEC Project inclusive of the Alternative IEC East Portion would continue to meet PJM's long-term planning needs by addressing the persistent congestion on the AP South reactive interface and related constraints. See also Supplemental Testimony of Timothy J. Horger, St. No. AA-3, at pp. 2-4.

In addition, on November 14, 2019, PJM published the results of its most recent evaluation of the IEC Project inclusive of the Alternative IEC East Portion. This analysis - performed in a manner consistent with all prior evaluations of the IEC Project and using PJM's most up-to-date market efficiency and reliability base case concluded that the project has a benefit-to-cost ratio of up to 1.66 , using the companies' cost estimates. See TPA Exhibit SRH-AA2.
Q. As originally proposed, the IEC Project would prevent certain reliability problems from occurring elsewhere on the transmission system in PJM. Does the IEC Project inclusive of the Alternative East Portion as described in the Amended Application allow the IEC Project to continue to provide such reliability benefits?
A. Yes. The IEC Project inclusive of the Alternative IEC East Portion as described in the Amended Application would also resolve the emerging reliability criteria violations that I identified on pages 20-22 of my rebuttal testimony. See Transource PA Statement No. 7-R, pp. 20-22. In the December 3, 2019 Whitepaper (TPA Ex. SRHA $\wedge-2$ ), PJM indicated to the PJM Board that "if Alternative Project 9A were to be removed from further consideration, PJM's RTEP analysis has previously identified a number of reliability criteria violations starting in the 2023 study year," including "conductor overloads on 500 kV transmission lines which, in PJM"s experience, are likely to be resolved only through the construction of additional greenfield transmission." See TPA Ex. SRH-AA2 (PJM Whitepaper, December 2019 Baseline Market Efficiency recommendations (Dec. 3, 2019) at 7).

## IV. CONCLUSION

Q. Does this conclude your supplemental testimony?
A. Yes.

Resolution for the Meeting of the PJM Board of Managers
December 4, 2019

## IEC Project inclusive of the Alternative IEC East Portion (Alternative Project 9A)

WHEREAS, Amended and Restated Operating Agreement of PJM Interconnection, L.L.C., Schedule 6, section 1.6(a) provides that the PJM Board of Managers is responsible for approving changes to the Regional Transmission Expansion Plan (RTEP);

WHEREAS, in August 2016, the PJM Board of Managers approved for inclusion in the RTEP baseline project b2743/2752 known as the Independence Energy Connection (IEC) Project (Project 9A) submitted in the 2014/2015 RTEP Long-Term Proposal Window;

WHEREAS, re-evaluations of Project 9A reaffirm PJM's recommendation that Project 9A remain in the RTEP;

WHEREAS, in the ongoing siting proceedings in Pennsylvania and Maryland, several of the parties have filed a settlement that, if approved, would not alter the western segment of Project 9 A as approved by the PJM Board of Managers, but offers an alternative configuration of the eastern portion of Project 9A (the Alternative IEC East Portion) - the IEC Project inclusive of the Alternative IEC East Portion is hereinafter referred to as Alternative Project 9A;

WHEREAS, PJM has demonstrated in its RTEP analyses that Alternative Project 9A exceeds the Benefit/Cost Ratio threshold of 1.25:1;

WHEREAS, the PJM Board of Managers has reviewed and considered (i) the RTEP materials developed by PJM in consultation with the Transmission Expansion Advisory Committee and (ii) PJM's recommendation that the PJM Board of Managers approve Alternative Project 9A subject to the Maryland Public Seryice Commission's and Pennsylvania Public Utility Commission's approval of the pending settlement; and

WHEREAS, the PJM Board of Managers has reviewed and considered the recommendation provided to the Board Reliability Committee of the PJM Board of Managers;

NOW, THEREFORE, BE IT RESOLVED, that the PJM Board of Managers hereby approves Alternative Project 9A subject to the Maryland Public Service Commission's and the Pennsylvania Public Utility Commission's approval of the Alternative Project 9A through their respective Certificate of Public Convenience and Necessity proceedings, and written confirmation from Transource Energy, LLC (for itself and on behalf of Transource Maryland, LLC and Transource Pennsylvania, LLC) that the Scope of Work set forth in the Designated Entity Agreement will be revised to reflect the configuration of Alternative Project 9 A (which is the western segment of Project 9A as previously approved by the PJM Board of Managers with an alternative configuration of the eastern portion of Project 9A).

## 童pjm

## December 2019 Baseline Market Efficiency Recommendations

## TEAC

Dec. 3, 2019

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## Summary

PJM is making several baseline market efficiency recommendations based on two recent bodies of Regional Transmission Expansion Plan (RTEP) analyses that addressed the following:

1. $2018 / 2019$ RTEP Long-Term Window Proposals
2. South-Central Pennsylvania and Northern Maryland (inclusive of the AP South Interface and related constraints) congestion relief

With respect to the first body of RTEP analyses, the 2018/2019 RTEP Long-Term Window yielded two market efficiency proposals evaluated by PJM that warrant recommendation to the PJM Board to alleviate congestion. The first recommendation is baseline project b3142, a PJM-MISO interregional project to rebuild the Michigan City-Trail Creek-Bosserman 138 kV transmission line. The second PJM recommendation is baseline project b3145 to rebuild the Hunterstown-Lincoln 115 kV line.

With respect to the second body of RTEP analyses - which includes additional RTEP analyses subsequent to the Transmission Expansion Advisory Committee's Nov. 14, 2019 review and comment - PJM has reviewed market efficiency projects that address congestion drivers in South-Central Pennsylvania and Northern Maryland.

More specifically, PJM's RTEP analyses reviewed:

- The Board-approved baseline project b2743/2752 known as the Independence Energy Connection (IEC) Project (Project 9A) submitted in the 2014/2015 RTEP Long-Term Proposal Window
- The Board-approved baseline project b2992 in the Bagley/Graceton area of BGE (Project 5E) submitted in the 2016/2017 RTEP Long-Term Proposal Window
- The baseline project b3145 to rebuild the Hunterstown-Lincoln 115 kV line (Project H-L), noted above, submitted in the 2018/2019 RTEP Long-Term Proposal Window, which PJM recommends to the Board for inclusion in the RTEP.

Additionally, in the ongoing siting proceedings in Pennsylvania and Maryland, several of the parties have filed a settlement that, if approved, would not alter the western segment of Project 9A as approved by the Board, but offers an alternative configuration of the eastern portion of Project 9A (the Alternative IEC East Portion). In light of this development, PJM's RTEP analyses have also considered:

- The IEC Project inclusive of the Alternative IEC East Portion, (Alternative Project 9A)
- Project 5E (which is already in the RTEP)
- Project H-L (which PJM is recommending to the Board for inclusion in the RTEP)

As discussed in greater detail below, PJM's analyses have determined that in the combinations set forth above, these projects exceed the benefitcost ratio of 1.25 , significantly reduce congestion in South-Central Pennsylvania and Northern Maryland, and solve reliability criteria violations identified in study year 2023 that PJM found to otherwise arise with certain of these projects removed from the base case.

Each of PJM's recommendations is now presented in more detail.

## 2018/2019 RTEP Long-Term Proposal Window Activity

PJM opened its third Long Term proposal window starting on November 2, 2018 through March 15, 2019 to solicit proposals addressing the identified congestion drivers shown in Table 1.

Market efficiency analysis is a part of the overall RTEP process to accomplish the following objectives:

1. Determine which reliability upgrades, if any, have an economic benefit if accelerated or modified.
2. Identify new transmission upgrades that may result in economic benefits.
3. Identify economic benefits associated with "hybrid" transmission upgrades. Hybrid transmission upgrades include proposed solutions, which encompass modifications to reliability-based enhancements already included in the RTEP that when modified would relieve one or more economic constraints. Such hybrid upgrades resolve reliability issues but are intentionally designed to provide economic benefits in addition to resolving reliability issues.

PJM conducts market efficiency analysis using market simulation tools of future annual periods for both the capacity market and energy market. Economic benefits of specific transmission projects are determined by comparing results of simulations that include each project with simulations that do not include the project. Projects are measured using two Tariff/Operating Agreement criteria. First, the project must address either an identified congestion driver or a capacity market constraint. Second, the project's total energy and capacity benefits must exceed costs (benefit to cost ratio) by at least 25 percent. Project energy benefits are measured by comparing the benefits in the form of net load payments and/or production costs with and without the proposed project for a 15 -year study period. Projects affecting the capacity market derive additional capacity benefits in the form of net load capacity payments and/or capacity costs.

## Identified Congestion Drivers

PJM posted a list of identified congestion drivers - facilities and their simulated congestion levels -- as part of soliciting proposals during the 2018/2019 Long-Term Proposal Window, as shown in Table 1.

Table 1. 2018/2019 Long-Term Window Congestion Drivers

| Constraint | Area | 2023 Congestion Frequency (hours) | 2023 Market Congestion ( $\$$, million) | 2026 Congestion Frequency (hours) | 2026 Market Congestion ( $\$$, million) |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Hunterstown-Lincoln 115 kV Line | MetEd (PJM) | 1,720 | \$20.77 | 1,832 | \$29.62 |
| Monroe \#1 and \#2-Wayne 345 kV Lines | MISO | 45 | \$1.44 | 30 | \$0.61 |
| Marblehead North Bus \#1 161/138 kV Transformer | MISO | 195 | \$1.41 | 138 | \$1.18 |
| Bosserman-Trail Creek 138 kV Line | AEPMISO | 66 | \$1.47 | 89 | \$1.69 |

Twelve parties submitted 34 proposals during the 2018/19 RTEP Long-Term Proposal Window that closed in March of 2019. Proposals ranged in cost from $\$ 0.1$ million to $\$ 290.95$ million and included transmission upgrades from
transmission owners and greenfield projects from incumbent transmission owners and non-incumbent entities, as summarized in Table 2.

Table 2. Proposals by Type Submitted in the 2018/2019 Long Term Proposal Window

| Congestion Driver | Number of <br> Proposals | Greenfield Proposals | TO Upgrade <br> Proposals |
| :--- | :--- | :--- | :--- |
| Hunterstown-Lincoln 115 kV Line | 22 | 19 | 3 |
| Bosserman-Trail Creek 138 kV Line | 5 | 4 | 1 |
| Marblehead \#1 161/138 kV Transformer | 2 | 1 | 1 |
| Monroe \#1 and \#2-Wayne 345 kV Lines | 3 | 0 | 3 |
| No PJM Driver | 2 | 1 | 1 |
| Total | $\mathbf{3 4}$ | $\mathbf{2 5}$ | $\mathbf{9}$ |

PJM evaluated the proposals according to Schedule 6 of the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. (Operating Agreement). PJM is recommending for Board approval a market efficiency interregional solution to provide congestion relief on the Bosserman-Trail Creek line. PJM is also recommending for Board approval the Hunterstown-Lincoln 115 kV rebuild as part of a combination of transmission projects to address congestion in South-Central Pennsylvania and Northern Maryland. Because the proposals submitted to address congestion on the Marblehead transformer and the Monroe-Wayne transmission lines did not satisfy PJM criteria, PJM is not recommending any of those proposals to the Board for approval.

## Recommendation: PJM-MISO Interregional Baseline Project b3142: Rebuild Michigan CityTrail Creek-Bosserman 138 kV Line

PJM-MISO interregional baseline project b3142, a rebuild of the Michigan City-Trail Creek-Bosserman 138 kV Line, is the first interregional proposal submitted during the Long-Term Proposal Window that PJM is recommending to the Board for approval and inclusion in the RTEP.

PJM, working with MISO through the Interregional Planning Stakeholder Advisory Committee (IPSAC), completed a two-year Interregional Market Efficiency Project (IMEP) study in parallel with PJM's 2018/2019 Long-Term Proposal Window process. As part of the IMEP Study, PJM and MISO separately received project proposals that addressed at least one congestion driver identified in each region's respective planning process. Under the terms of the PJM/MISO Joint Operating Agreement, interregional proposals are separately submitted to, and evaluated by PJM and MISO, and subject to each RTO's respective regional processes.

As shown earlier in Table 1, The Bosserman-Trail Creek 138 kV line in Northern Indiana Public Service Company (NIPSCO) - in the MISO footprint - was identified as an interregional targeted congestion facility. Simulations performed in advance of the 2018/2019 Long Term proposal window identified over $\$ 1.4$ million in market congestion on this facility based on 2023 input assumptions and simulation results. PJM received a cluster of five proposals (four greenfield proposals and one upgrade proposal) from five entities to address the Bosserman-Trail Creek congestion. The proposed project cost estimates ranged from $\$ 19$ million to $\$ 266$ million.

## Solution Selection

The energy benefits associated with the proposed projects were determined using the methodologies specified in Schedule 6 of the Operating Agreement. PJM's annual energy benefits calculation for lower voltage facilities is weighted 100 percent to zones with a decrease in net load payments as a result of the proposed project. Change in net load payments comprises the change in gross load payments offset by the change in transmission rights credits. No capacity benefits were identified with these proposed projects.

PJM evaluated each of the five proposals, out of which two exceeded the 1.25 benefit-to-cost ratio and fully mitigated congestion: (1) proposal BT_481 to rebuild the Michigan City-Trail Creek-Bosserman 138 kV line; and, (2) proposal BT_129 to build a new Kuchar substation and new Kuchar-Luchtman 138 kV line. PJM conducted further analysis on these two proposals to determine how the projects addressed the identified congestion and to evaluate project constructability risk.

Based on the analysis performed, PJM selected proposal BT_481 shown on Map 1 - a rebuild of the Michigan CityTrail Creek-Bosserman 138 kV line - as the more efficient or cost effective solution to the identified congestion driver. Proposal BT_481:

- Has a benefit-to-cost ratio of 2.63 , which was the highest benefit-to-cost ratio across the proposals submitted for the Bosserman-Trail Creek constraint; cost estimates were from PJM's own constructability analysis
- Fully addresses the congestion driver
- Is an upgrade and has lower constructability risk compared to the four greenfield proposals, including BT_129

In addition to the market efficiency base case analysis for the recommended proposal BT_481, PJM also performed sensitivity analysis on key input variables: natural gas prices, PJM load forecasts, generation expansions, and generator outage patterns. The benefit to cost ratio exceeded 1.25 in each instance. An RTEP process reliability analysis of the project did not identify any reliability criteria violations. PJM also conducted a constructability review of the components proposed by project BT_481 and did not identify any significant issues.

In conclusion, PJM is recommending proposal BT_481 to the PJM Board for provisional approval as an interregional baseline project, pending approval by the MISO Board as well. Both the PJM and MISO boards must approve the project in order for it to be included in each entity's regional transmission plan. BT_481 project elements will be designated to NIPSCO, the proposing entity and transmission owner of the project elements in the MISO footprint:

- Reconductor Bosserman-Trail Creek 138 kV line
- Reconductor Michigan City-Trail Creek 138 kV line
- Michigan City Substation Upgrades
- Trail Creek Substation Upgrades

The estimated cost for the project is $\$ 24.69$ million (in service dollars) with a January 2023 in-service date required. Based on the PJM to MISO benefit ratio, 89.1 percent of the cost ( $\$ 22.00$ million) will be allocated to PJM.

Map 1. Baseline Project b3142: Bosserman-Trail Creek-Michigan City 138 kV Proposal


## South-Central Pennsylvania and Northern Maryland Congestion

The following discussion relates to three projects addressing congestion in South-Central Pennsylvania and Northern Maryland, including congestion on the AP South Interface and related constraints. The first project (Project 9A) was submitted in the 2014/2015 RTEP Long-Term Proposal Window and approved by the PJM Board in August 2016. The second project (Project 5E) was submitted in the 2016/2017 RTEP Long-Term Proposal Window and approved by the PJM Board in April 2018. PJM is recommending the third project (Project H-L), which was submitted in the 2018/2019 RTEP Long-Term Proposal Window, for approval by the PJM Board. Because this combination of projects addresses interrelated congestion drivers, PJM has reviewed these projects to consider interactions among them given the dynamic nature of the market efficiency base case through changes in the 2014/2015, 2016/2017, and 2018/2019 RTEP Years, and in light of potential reliability criteria violations otherwise found to arise in 2023 in SouthCentral Pennsylvania and Northern Maryland with certain of these projects removed from the base case.

## Recommendation

PJM's RTEP analyses relative to the South-Central Pennsylvania and Northern Maryland congestion include a review of Project 9A, Project 5E, and Project H-L, as well as a review of Alternative Project 9A, Project 5E, and Project H-L.

As discussed in greater detail below, PJM's RTEP analyses have determined that in the combinations described, these projects exceed the benefit-to-cost ratio of 1.25 , significantly reduce congestion, and solve reliability criteria violations identified in study year 2023 that otherwise were found to arise with certain of these projects removed from the base case.

As such, PJM recommends that:

- Project $\mathrm{H}-\mathrm{L}$ be added to the RTEP
- Project 5E, as approved, remain in the RTEP
- Project 9A, as approved by the Board, continues to exceed the benefit-to-cost ratio and should remain in the RTEP
- Alternative Project 9A exceeds the benefit-to-cost ratio and, if approved by the Maryland and Pennsylvania Commissions through their respective CPCN application processes, Alternative Project 9A would be recommended for approval by the PJM Board of Managers as memorialized in a Board Resolution. Upon approval by both State Commissions, PJM would present Alternative Project 9A to the Board for final approval and inclusion in the RTEP.

Error! Reference source not found. summarizes PJM's RTEP analyses relating to the projects noted above. As is made clear below, the benefit-to-cost ratios exceeded the 1.25 threshold in the scenarios where PJM studied Project 9A, Project 5E, and Project H-L in the aggregate, and Alternative Project 9A, Project 5E, and Project H-L in the aggregate.

Table 3. Summary of Recent RTEP Analyses

| RTEP Analyses ${ }^{1}$ | Date Presented | Benefit to Cost Ratio |
| :--- | :--- | :--- |
| Alternative Project 9A | May 8, 2019 | 1.39 (using \$466.44M as cost est.) -1.52 (using <br> $\$ 426.02 \mathrm{M}$ as cost est.) |
| Re-evaluation of Project 9A | Oct. 17, 2019 | 2.10 |
| Re-evaluation of Project 5E | Nov. 14, 2019 | $1.11^{2}$ |
| Project H-L | Nov. 14, 2019 | 76.41 |
| Alternative Project 9A | Nov. 14, 2019 | 1.60 |
| Re-evaluation of Project 5E <br> (assuming Board approval of <br> Project H-L) | Nov. 14, 2019 | 1.80 |
| Project 9A + Project 5E + Project <br> H-L | To be presented at the <br> December TEAC. | 2.87 , aggregate |
| Alternative Project 9A + Project <br> 5E + Project H-L | To be presented at the <br> December TEAC. | 2.25 (using \$561.68M as cost est.) - 2.33 (using |

The individual elements of each of the projects described above are shown schematically in Figure 1.
PJM conducted RTEP analyses of the two combinations noted in the last two rows of Table 3, above. PJM proceeded in this manner because the two combinations are comprised of:

[^5]- Project 9A or Alternative Project 9A, a project that is nearing a decision in the state siting processes (and, notably, in the case of Alternative Project 9A, the siting processes might culminate in a Commissionapproved settlement reflecting a compromise among certain parties to the proceeding)
- Project 5 E , a project that is advanced in both its engineering and procurement phases
- Project $\mathrm{H}-\mathrm{L}$, which is a relatively modest upgrade

In the aggregate, PJM's RTEP analyses show that these combinations of projects exceed the benefit-to-cost ratio of 1.25 , significantly reduce congestion, and solve reliability criteria violations identified in study year 2023 that otherwise were found to arise with certain of these projects removed from the base case.

It is important to note that if Project 9 A or Alternative Project 9 A were to be removed from further consideration, PJM's RTEP analysis has previously identified a number of reliability criteria violations starting in the 2023 study year. Some of these reliability criteria violations include conductor overloads on 500 kV transmission lines which, in PJM's experience, are likely to be resolved only through the construction of additional greenfield transmission. Should these combinations of projects inclusive of Project 9A or Alternative Project 9A be removed from the RTEP, resultant reliability criteria violations would be identified during the 2020 RTEP analysis, and potential solutions to such reliability criteria violations would not be identified to the Board until late 2020 or early 2021. Furthermore, removing these combinations of projects from the RTEP would fail to address the congestion that would be reintroduced into South-central Pennsylvania and Northern Maryland. Any proposal window to address this reintroduced congestion would not be held until 2021, with solutions not likely to be presented to the Board until late 2021. In light of this timing, and based on the likely need for greenfield transmission, PJM predicts that new CPCN applications for not-yet-identified reliability and market efficiency drivers would not be filed until 2022 or 2023. Conservatively assuming one to two years for state siting proceedings, reliability and market efficiency solutions likely could not be constructed sufficiently quickly to remediate reliability criteria violations, and further would leave customers subject to significant congestion for a number of years to come.

Figure 1. South-Central Pennsylvania and Northern Maryland Congestion


## Project 9A and Alternative Project 9A

Project 9A, as approved by the Board, continues to exceed the 1.25 Benefit-to-Cost Ratio
The PJM Board approved Project 9A in August 2016 to address persistent congestion in South-Central Pennsylvania and Northern Maryland. Project 9A includes a western component - the Rice-Ringgold 230 kV line - and an eastern component - the Furnace Run-Conastone-Northwest 230 kV line - shown on Map 2.

Five subsequent re-evaluations (Sept. 14, 2017; Feb. 8, 2018; Sept. 13, 2018; March 7, 2019; and Sept. 24, 2019) reaffirm PJM's recommendation that Project 9A be included in the RTEP, as discussed in detail in PJM's Nov. 15, 2018 white paper ${ }^{3}$ and in testimony filed in the pending state siting proceedings. The below chart summarizes RTEP analyses of Project 9A from its presentation to the Board in August 2016 through the present, demonstrating that Project 9A continues to exceed the 1.25 benefit-to-cost ratio.

For the reasons discussed in this paper, Project 9 A , as approved by the Board, continues to exceed the benefit to cost ratio and should remain in the RTEP.

Map 2. Project 9A


## Alternative Project 9A Exceeds the 1.25 Benefit-to-Cost Ratio and Reflects a Compromise Among Certain Parties in the Pending CPCN Proceedings in Maryland and Pennsylvania

Alternative Project 9A is the product of data requests, analysis and agreement among several of the parties ${ }^{4}$ in the Maryland and Pennsylvania siting proceedings. Those parties have executed and filed a proposed settlement before the Maryland and Pennsylvania state Commissions seeking the approval of Alternative Project 9A (such approval

[^6]being in the altemative to state Commission approval of Board-approved Project 9A). Discovery is ongoing and additional procedural orders are anticipated relating to Alternative Project 9A and the settlement.

Alternative Project 9A (as shown on Map 3) is comprised of the same western segment in Project 9A, as approved by the Board. Alternative Project 9A reflects modifications to the eastern segment of Board-approved Project 9A and involves less greenfield transmission than Project 9A because Alte mative Project 9A uses a pre-existing right of way that requires expansion. In Maryland, the eastern segment of Alternative Project 9A would be constructed, owned and maintained by Baltimore Gas and Electric Company (BGE) within its existing utility rights-of-way. BGE would add a second 230 kV circuit on the existing Otter Creek-Conastone 230 kV line. BGE would also replace eight lattice structures that currently hold the single-circuit Manor-Graceton 230 kV line with approximately eight monopole structures, which would then carry a second 230 kV line. In Pennsylvania, PPL Electric Utilities Corporation (PPL) would construct, own and maintain the lines within PPL's expanded existing rights-of-way.

In the course of the state siting proceedings, PJM was asked to analyze Alternative Project 9A. Error! Reference source not found. summarizes the body of RTEP analyses PJM has conducted regarding Alternative Project 9A.

Table 4. Summary of Recent RTEP Analyses Involving Alternative Project 9A

| RTEP Analyses ${ }^{5}$ | Date Presented | Benefit-to-Cost Ratio |
| :---: | :---: | :---: |
| Alternative Project 9A | May 8, 2019 | 1.39 (using $\$ 466.44 \mathrm{M}$ as cost est.) -1.52 (using $\$ 426.02 \mathrm{M}$ as cost est.) |
| Alternative Project 9A | Nov. 14, 2019 | 1.60 |
| Alternative Project 9A6 + Project $5 \mathrm{E}+$ Project $\mathrm{H}-\mathrm{L}$ | To be presented at the December TEAC. | 2.25 (using $\$ 561.68 \mathrm{M}$ as cost est.) -2.33 (using $\$ 533.99 \mathrm{M}$ as cost est.), aggregate |

PJM's RTEP analyses show that a combination of Altemative Project 9A, Project 5E, and Project H-L exceed the benefit-to-cost ratio of 1.25 , significantly reduce congestion, and solve reliability criteria violations identified in study year 2023 that otherwise were found to arise with Altemative Project 9 A removed from the base case.

For the reasons discussed in this paper, Altemative Project 9 A exceeds the benefit-to-cost ratio and, if approved by the Maryland and Pennsylvania Commissions through their respective CPCN application processes, Altemative Project 9A would be recommended for approval by the PJM Board of Managers as memorialized in a Board

[^7]Resolution. Upon approval by both State Commissions, PJM would present Alternative Project 9 A to the Board for final approval and inclusion in the RTEP

## Map 3. The Alternative Configuration of the Eastern Portion of Project 9A (the Alternative IEC East Portion)*


*Note: Dotted red line depicts originally proposed Furnace Run-Conastone 230 kV line now being rerouted.

## Project 5E, as Approved by the Board

In April 2018, the PJM Board approved baseline Project 5E with a benefit to cost ratio of 5.23 (calculated using an initial cost estimate of $\$ 39.65$ million). This market efficiency project would alleviate congestion on the Conastone-Graceton-Bagley 230 kV line in the BGE zone. Submitted by BGE, the project comprises reconductoring the Conastone-Graceton and Raphael Road-Northeast 230 kV lines together with adding bundled conductor to the Graceton-Bagley-Raphael Road double circuit lines, as shown on Map 4.

A re-evaluation of Project 5E in September 2018 yielded a benefit to cost ratio of 9.18 , reaffirming the basis for PJM's recommendation that Project 5E be included in the RTEP.

At present, the estimated cost for Project 5 E is $\$ 48,295,868$ (2021 dollars). Error! Reference source not found. summarizes the recent body of RTEP analyses PJM has conducted regarding Project 5 E .

## Table 5. Summary of Recent RTEP Analyses Involving Project 5E

| RTEP Analyses ${ }^{\text {7 }}$ | Date Presented | Benefit-to-Cost Ratio |
| :---: | :---: | :---: |
| Re-evaluation of Project 5E | Nov. 14, 2019 | $1.11^{8}$ |
| Re-evaluation of Project 5 E (assuming Board approval of Project H-L) | Nov. 14, 2019 | 1.80 |
| ```Project 9A + Project 5E + Project H-L``` | To be presented at the December TEAC. | 2.87, aggregate |
| Altemative Project $9 \mathrm{~A}+$ <br> Project 5E + Project H-L | To be presented at the December TEAC. | 2.25 (using $\$ 561.68 \mathrm{M}$ as cost est.) -2.33 (using $\$ 533.99 \mathrm{M}$ as cost est.), aggregate |

Although an initial re-evaluation of Project 5 E indicated that the project no longer satisfied the benefit-to-cost criteria due to the continued evolution of the RTEP and increased cost estimates, PJM's RTEP analyses described above have studied the interaction of Project 5E, Project H-L and Project 9A or Alternative Project 9A. PJM's analyses indicate that it would not be accurate to conclude that Project 5 E is no longer performing because the project combinations analyzed show that when Project 5E is studied in context, it no longer binds first and continues to exceed the 1.25 benefit-to-cost ratio threshold. For the reasons discussed above, PJM recommends that Project 5E remain in the RTEP.

## Map 4. Project 5E



[^8]
## PJM's Recommendation of Project H-L

PJM opened a Long-Term Proposal Window on Nov. 2, 2018, that closed on March 15, 2019. For the reasons that follow, and because of the interactions between Project H-L, Project 5E and Project 9A or Alternative Project 9A, PJM recommends that the Board approve Project H-L and include it in the RTEP.

Project H -L consists of upgrades and changes to existing equipment designated to the incumbent transmission owner:

- Rebuild the Hunterstown to Lincoln 115 kV line
- Upgrade substation equipment at Hunterstown Substation
- Upgrade substation equipment at Lincoln Substation

The estimated cost for proposal Project H-L is $\$ 7.21$ million, and the in-service date is June 2023.
As presented in Table 1and on Map 5, PJM identified the Hunterstown-Lincoln 115 kV line as a targeted congestion facility. Simulations performed in advance of the 2018/2019 Long-Term Proposal Window identified over $\$ 20.77$ million in market congestion on this facility based on 2023 input assumptions and simulation results. The below serves as a description of the analysis that was conducted for this proposal window.

PJM received a cluster of 22 proposals (19 greenfield proposals and three upgrade proposals) from seven entities to address the Hunterstown-Lincoln congestion driver. The proposed project costs ranged from $\$ 4.65$ million to $\$ 290.95$ million.

PJM analyzed the proposals to determine which, if any, satisfied the 1.25 benefit-to-cost ratio criteria and provided the greatest degree of congestion relief. The energy benefits associated with the proposed projects were determined using the methodologies specified in Schedule 6 of the Operating Agreement. PJM's annual energy benefits calculation for lower voltage facilities is weighted 100 percent to zones with a decrease in net load payments as a result of the proposed project. Change in net load payments comprises the change in gross load payments offset by the change in transmission rights credits. No capacity benefits were identified with these proposed projects.

Of the proposals that did pass the benefit-to-cost ratio criteria in the base case, PJM selected the highest five benefit-to-cost ratio proposals for further evaluation. PJM then conducted market efficiency sensitivity analysis on those five proposals.

Of these five solutions, three proposals fully addressed the congestion driver. These three proposals included: (1) Project H-L (presented to stakeholders as HL_622), which rebuilds the Hunterstown-Lincoln 115 kV line; (2) HL_ 469, which installs a SmartValve ${ }^{9}$ on the Hunterstown-Lincoln 115 kV line; and (3) HL_960, which builds an additional Hunterstown-Lincoln 115 kV line. PJM ultimately narrowed this list of three projects to two.

[^9]Figure 2 shows a comparison of the top two proposals highlighting the challenges involved with the SmartValve proposal.

Figure 2. Comparison of Proposals for Hunterstown-Lincoln 115 kV Line

| Criteria | $\begin{aligned} & \text { HL_ } 622 \text { Upgrade } \\ & \text { Solution } \end{aligned}$ | HL 469 <br> SmartValve ${ }^{\text {TM' }}$ Solution |
| :---: | :---: | :---: |
| Constructability Risk | Upgrade, no additional property needed | Greenfield, permitting risk related to new property for substation due to location near historically sensitive area |
| P.MM Operations and Markets | No changes needed to real-time operations procedures and practices | At this time, real-time operations would not be able to fully utilize the dynamic capabilities of this device without additional changes |
| Additional Integration Cost with Operations and Markets | No additional costs | May require updating Day-Ahead, Real-Time, SCADA systems to support full operational range of this type of device |
| Industry experience | Established well known solution | Limited experience with SmartValve ${ }^{\text {Tru }}$ device |
| Additional System Capability/Flexibility | Yes/No | NoMes |

"SmartValva is a Trademark of Smart Wires inc.
Based on the analysis performed, PJM selected Project H-L (HL_622), which rebuilds the Hunterstown-Lincoln 115 kV line as more efficient or cost effective solution because Project H-L:

- Has a benefit-to-cost ratio of 76.41
- Fully addresses the target congestion driver
- Is an upgrade and has less constructability risk
- Consistently delivers a high benefit-to-cost ratio, passes all sensitivity scenarios, and given the comparison criteria shown in Figure 2, was the preferred solution
- Did not cause any reliability issues under PJM's RTEP reliability analysis.

PJM's RTEP analyses described above have studied the interaction of Project 5E, Project H-L, and Project 9A or Alternative Project 9A. PJM's analyses indicate that Project H-L continues to play an important role in the mitigation of congestion in South-Central Pennsylvania and Northern Maryland as reflected in 0 . In conclusion, Project H-L shown in Table 7 is being recommended to the Board for approval for inclusion in the RTEP. The local transmission owner/proposing entity, Mid-Atlantic Interstate Transmission (MAIT), would be designated to complete this work. Cost allocation for the project can be found in Table 8.

Table 6. Summary of Recent RTEP Analyses Involving Project H-L

| RTEP Analyses ${ }^{10}$ | Date Presented | Benefit to Cost Ratio |
| :--- | :--- | :--- |
| Project H-L | Nov. 14, 2019 | 76.41 |
| Project 9A + Project 5E + <br> Project H-L | To be presented at the December TEAC. | 2.87, aggregate |
| Alternative Project 9A + <br> Project 5E + Project H-L | To be presented at the December TEAC. | 2.25 (using $\$ 561.68 \mathrm{M}$ as cost est.) -2.33 <br> (using $\$ 533.99 \mathrm{M}$ as cost est.), aggregate |

## Table 7. Identified Market Efficiency Projects

| PJM <br> Baseline <br> ID | PJM <br> Window <br> Project ID | Project Description | Transmission <br> Zone | Constraint <br> Project <br> Addresses | Project <br> Cost (\$M) | In- <br> Service <br> Date | B/C Ratio |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| b3145 | $201819 \_1-$ | Rebuild the <br> Hunterstown - Lincoln <br> 115 kV 962 line ( -2.6 <br> mi.). Upgrade limiting <br> terminal equipment at <br> Hunterstown and <br> Lincoln. | MetEd | Hunterstown <br> -Lincoln 115 | 7.21 | 2023 | 76.41 |
| kV |  |  |  |  |  |  |  |

## Map 5. Project H-L



[^10]Table 8. Cost Allocation Factors for Project H-L

| b3145 | Rebuild the Hunterstown Lincoln 115 kV line (No.962) (~2.6 mi.). Upgrade limiting terminal equipment at Hunterstown and Lincoln. | \$7.21 | ME | $\begin{aligned} & \hline \text { AEP (16.60\%) } \\ & \text { APS (8.09\%) } \\ & \text { BGE (2.74\%) } \\ & \text { Dayton (2.00\%) } \\ & \text { DEOK (0.35\%) } \\ & \text { DL (1.31\%) } \\ & \text { Dominion (52.77\%) } \\ & \text { EKPC (1.54\%) } \\ & \text { OVEC (0.06\%) } \\ & \text { PEPCO (14.54\%) } \end{aligned}$ | June 1, 2023 |
| :---: | :---: | :---: | :---: | :---: | :---: |

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

\author{
Application of Transource Pennsylvania, LLC for approval of the Siting and Construction of the A-2017-2640195 <br> 230 kV Transmission Line Associated with the <br> Independence Energy Connection - East and West Projects in portions of York and Franklin Counties, Pennsylvania. <br> \section*{Petition of Transource Pennsylvania, LLC} <br> for a finding that a building to shelter control equipment <br> at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public. <br> \section*{Petition of Transource Pennsylvania, LLC} <br> for a finding that a building to shelter control equipment at the Furnace Run Substation in York County. Pennsylvania <br> is reasonably necessary for the convenience or welfare of the public. <br> Application of Transource Pennsylvania. LLC for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Line associated with the Independence Energy Connection East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public.

P-2018-3001883 A-2018-3001881, <br> P-2018-3001878 et al.
}

TRANSOURCE PENNSYLVANIA, LLC
SUPPLEMENTAL TESTIMONY OF
TIMOTHY J. HORGER
IN SUPPORT OF AMENDED APPLICATION
TRANSOURCE PA STATEMENT NO. AA-3

Date: January 29, 2020

## Q. Please state your name and business address.

A. My name is Timothy J. Horger. I am the Director of Energy Market Operations at P.JM Interconnection, LLC ("PJM"). My business address is 2750 Monroe Boulevard, Audubon, Pennsylvania 19403.

## Q. Have you previously provided testimony in this proceeding?

A. Yes. I submitted rebuttal testimony on November 27, 2018 and rejoinder testimony on February 11, 2019. In my rebuttal testimony. I adopted as my own sections of Mr. Paul McGlynn`s Direct Testimony. I submitted supplemental testimony on May 14, 2019. I also testified at the evidentiary hearing held in this matter.
Q. Please describe the purpose of your Supplemental Testimony.
A. I am submitting testimony on behalf of Transource Pennsylvania, LLC ("Transource PA") in support of the Amended Application. In my supplemental testimony, I will explain PJM's analysis of the Independence Energy Connection Project ("IEC Project"), with the alternative routing of the eastern portion of the IEC Project ("Alternative IEC East Portion").' as described in the Amended Application. PJM has undertaken additional analysis of the IEC Project inclusive of the Alternative IEC East Portion and the PJM Board of Managers has approved the IEC Project inclusive of the Alternative IEC East Portion for inclusion in the Regional Transmission Expansion Plan if the

[^11]Pennsylvania Public Utility Commission and Maryland Public Service Commission grant the necessary approvals for the IEC Project inclusive of the Alternative IEC East Portion.
Q. Are you sponsoring any exhibits with your Supplemental Testimony?
A. Yes. Attached to my testimony are:

- TPA Exhibit TJH-AA1: slides presented at the November 14, 2019 PJM TEAC meeting
- TPA Exhibit TJH-AA2: slides presented at the December 12, 2019 PIM TEAC meeting
- TPA Exhibit TJH-AA3: market efficiency analyses/workpapers


## II. ANALYSIS PERFORMEI BY PJM REGARDING THE IEC PROJECT

 INCLUSIVE OF THE ALTERNATIVE IEC EAST PORTIONQ. Since the time of your May 14, 2019 supplemental testimony and the evidentiary hearing, has PJM conducted any updated market efficiency analyses on the IEC Project inclusive of the Alternative IEC East Portion that is the subject of the Amended Application?
A. Yes. In July 2019, and unrelated to Project 9A, PJM`s market planning group completed a "mid-cycle" update to PJM's market efficiency "base case." The market efficiency base case is the tool PJM's market planning group uses to evaluate whether a proposed market efficiency project will provide benefits, based on a number of planning assumptions. To confirm that the IEC Project inclusive of the Alternative IEC East Portion continues to meet PJM's market efficiency planning needs, PJM conducted another analysis of the IEC Project inclusive of the Alternative IEC East Portion using
the updated mid-cycle base case. See TPA Ex. SRH-AA-2 (PJM December 3, 2019 Whitepaper) at 9 n.5. The IEC Project inclusive of the Alternative IEC East Portion continues to exceed the benefit-to-cost ratio of 1.25 required for approval of a market efficiency project.

## Q. What were the results of this updated analysis?

A. The updated analysis shows that the IEC Project inclusive of the Alternative IEC East Portion continues to provide substantial market efficiency benefits. PJM determined that the IEC Project inclusive of the Alternative IEC East Portion is now projected to have a benefit-to-cost ratio up to 1.66 based on the companies` cost assumptions, representing an increase in the range PJM had calculated in May 2019.

## Q. Did P.JM conduct any sensitivity analyses?

A. Yes. The capital cost figures that were used to calculate the 1.66 benefit-to-cost ratio were figures provided by Transource, PPL Electric, and BGE. PJM reached out independently to each transmission owner, each of which confirmed that their costs were the most up-to-date estimates. Nevertheless, PJM also calculated a benefit-to-cost ratio assuming a 25 percent adder to PPL Electric's and BGE's cost estimates. Even assuming this adder, the benefit to cost ratio for the IEC Project with the proposed Alternative IEC East Portion would be 1.60 .

Additionally, PJM also conducted a market efficiency sensitivity analysis assuming a 1 percent load decrease in addition to the lower load assumptions already incorporated into the updated mid-cycle base case. Again, even assuming this sensitivity,
the benefit to cost ratio for the IEC Project with the proposed Alternative IEC East Portion would range from 1.46 (including the 25 percent cost adder) to 1.52 . The full range of sensitivities performed by PJM are set forth in the below chart: ${ }^{2}$

| Updated Mid-Cycle Base Case | NPV \$(M) <br> BGE/PPL <br> Validated <br> Costs | NPV S(M) <br> Including 25\% <br> Cost Adder |
| :--- | ---: | ---: |
| Total Cost for Project 9A as modified by Settlement | $\$ 478.48$ | $\$ 496.17$ |
| B/C Ratio for Project 9A as modified by Settlement | 1.66 | 1.60 |


| Sensitivity Case - 1\% Load Decrease (Peak and <br> Energy) | Present \$ (M) <br> BGE/PPL <br> Validated <br> Costs | Present \$ (M) <br> Including 25\% <br> Cost Adder |
| :--- | ---: | ---: |
| Total Cost for Project 9A as modified by Settlement | $\$ 478.48$ | $\$ 496.17$ |
| B/C Ratio for Project 9A as modified by Settlement | 1.52 | 1.46 |

Q. Does the IEC Project inclusive of the Alternative IEC East Portion provide projected market efficiency benefits?
A. Yes. After having now conducted multiple market efficiency analyses of the IEC Project inclusive of the Alternative IEC East Portion resulting in benefit-to-cost ratios exceeding the 1.25 threshold, the Project as proposed in the Amended Application would result in a project that continues to provide customers with substantial benefits. See TPA Ex. SRH-AA-2 (PJM December 3, 2019 Whitepaper) at 5-6, 8-9. PJM's costs and load forecast sensitivity analyses also demonstrate that the IEC Project inclusive of the Alternative IEC East Portion would continue to exceed PJM`s benefit-to-cost threshold of 1.25 . See id. Therefore, just as Project 9A as originally configured would provide substantial market

[^12]4 Q. Does this conclude your Supplemental Testimony at this time?
5 A. Yes.

# Market Efficiency Update 

Nick Dumitriu<br>Sr. Lead Engineer, Market Simulation<br>Transmission Expansion Advisory Committee<br>November 14, 2019

## 2018/19 Market Efficiency Window

# 2018/19 Market Efficiency Window Interregional Analysis 

- Analysis is complete, concluding 2019 PJM-MISO Coordinated System Plan
- Three drivers identified:
- Marblehead N 161/138kV Transformer
- No proposed project met B/C criteria in either region
- Monroe - Wayne 345kV
- No proposed project effectively resolved congestion
- Bosserman - Trail Creek 138kV
- Rebuilding Michigan City to Trail Creek to Bosserman 138kV to be recommended in both regional processes
- PJM selected BT_481, rebuilding Michigan City to Trail Creek to Bosserman 138 kV lines
- Results presented at Oct 2019 TEAC:
- Highest B/C ratio
- Robustly addresses congestion on identified issue
- Passed reliability no-harm test
- Passed all PROMOD sensitivity scenarios
- Recommended as Interregional Market Efficiency project in both PJM and MISO regional processes
- Interregional Cost allocation
- PJM 89.1\% MISO 10.9\%


TPA Ex. TJH-AA1 Page 6 of 31 Bosserman-Trail Creek Proposal Final Results

| Proposal ID | BT_481 |
| :--- | :---: |
|  | Proposal Description |
| Rebuild Michigan City-Trail Creek- |  |
| Bosserman $\mathbf{1 3 8} \mathbf{~ k V}$ (10.7mi) |  |$\}$

[^13]TPA Ex. TJH-AA1
Trend for Net Load Benefits of Proposal BT_481


- Recommend BT_481 for provisional* approval at the December Board meeting
- Continue to coordinate with MISO
*Dependent on MISO Board approval of same project

2018/19 Market Efficiency Window Hunterstown - Lincoln Proposals

- Preliminary results first presented at July 2019 TEAC
- Calculated preliminary benefits and determined preliminary B/C ratios for all 22 proposals
- Top 5 proposals analysis completed
- Cost/Constructability review completed
- PROMOD base and sensitivity runs completed (see Appendix B)
- Three lower cost proposals fully relieve congestion on the driver with minimal shift in congestion
- HL_622: Rebuild the Hunterstown-Lincoln 115 kV line
- HL_469: Install SmartValve* power flow control series devices
- HL_960: Build new Hunterstown-Lincoln 115 kV line
*SmartValve is a Trademark of Smart Wires Inc.


| Proposal ID | HL_622 | HL_469** | HL_007 | BT_293 | HL_960 |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Proposal Description | Rebuild the HunterstownLincoln 115 kV line. | Install SmartValve ${ }^{\text {TM** }}$ power flow control 5\% series reactance device in series with the Lincoln Tap-Hunterstown 115 kV line. | Build a 115 kV ring bus at the Lincoln tap. | Build Meade 115 kV substation. | Build new HunterstownLincoln 115 kV line. |
| Project Type | Upgrade | Greenfield | Greenfield | Greenfield | Greenfield |
| Proposer Cost (\$MM) | \$7.21 | \$4.65 | \$7.58 | \$8.95 | \$10.13 |
| PJM/Independent Cost (\$MM)* | \$6.20 | \$7.15 | \$8.26 | \$8.40 | \$11.92 |
| Cost Containment | No | No | No | No | Yes |
| In-Service Year | 2023 | 2022 | 2023 | 2023 | 2021 |
| \% Cong Driver Mitigated | 100\% | 100\% | 86\% | 86\% | 100\% |
| 2023 Shifted Cong (\$MM) | \$1.77 | \$2.03 | \$1.35 | \$1.35 | \$1.89 |
| 15-Yr NPV NLP Benefit (\$MM) | \$586 | \$552 | \$428 | \$428 | \$563 |
| PJM Cost Used (\$MM) | \$7.21 | \$7.15 | \$8.26 | \$8.40 | \$11.92 |
| B/C Ratio | 76.41 | 72.61 | 48.78 | 47.97 | 44.39 |

*Costs based on PJM's Independent Cost/Constructability Review
**SmartValve is a Trademark of Smart Wires Inc.

## TPA Ex. TJH-AA1 <br> SmartValveTM vs. Reconductoring Proposal

| Criteria | HL_622 Upgrade Solution | $\begin{gathered} \text { HL_469 } \\ \text { SmartValve }{ }^{T M^{*}} \text { Solution } \end{gathered}$ |
| :---: | :---: | :---: |
| Constructability Risk | Upgrade, no additional property needed | Greenfield, permitting risk related to new property for substation due to location near historically sensitive area |
| PJM Operations and Markets | No changes needed to real-time operations procedures and practices | At this time, real-time operations would not be able to fully utilize the dynamic capabilities of this device without additional changes |
| Additional Integration Cost with Operations and Markets | No additional costs | May require updating Day-Ahead, Real-Time, SCADA systems to support full operational range of this type of device |
| Industry experience | Established well known solution | Limited experience with SmartValve ${ }^{\text {TM }}$ device |
| Additional System Capability/Flexibility** | Yes/No | No/Yes |

*SmartValve is a Trademark of Smart Wires Inc
**Capability in terms of line ratings increase / Flexibility in terms of dynamic flow control

- Completed comprehensive analysis considering both economic benefits and operational challenges of proposals
- HL_622, rebuild the Hunterstown-Lincoln 115 kV line, will be recommended to the PJM Board for RTEP inclusion
- High B/C Ratio: 76.41
- Low Cost: $\$ 7.21$ million
- Fully addresses target congestion driver Hunterstown - Lincoln 115 kV
- Passes all PROMOD sensitivity scenarios
- Reliability Analysis has been completed and no reliability violation identified
- PJM staff will recommend proposal HL_622 to the PJM Board
- Proposal will be presented at the December Board meeting
- Timeline supports RTEP model build

TPA Ex. TJH-AA1

## Trend for Net Load Benefits of Proposal HL_622



# 2019 Annual Reevaluation of Market Efficiency Projects 

- Applies to Market Efficiency projects approved during the 2014/15 and 2016/17 RTEP Windows
- Using the most recent Market Efficiency case available:
- Base case version 2019-07-26 (posted on 08/02/2019)
- With First Energy generator deactivations withdrawn
- Projects already in-service, under construction or cancelled are no longer required to be reevaluated.
- Projects must continue to meet the B/C criterion of 1.25
- Reevaluation Process to be completed by December 2019


# 5E (b2992) <br> Reevaluation Analysis Overview 

- History
- Project 5E (B2992) approved during 2016/17 Window:
- B/C Ratio: 5.93 (Cost: $\$ 39.65$ mill)
- Reevaluation Nov 2019
- Updated Cost: $\$ 48.3$ mill
- B/C Ratio: 1.11
- B/C Ratio: 1.80 (with Hunterstown - Lincoln congestion relieved)
- In the current Market Efficiency Base Case, benefits of 5E (b2992) are decreased because of Hunterstown - Lincoln 115 kV congestion
- Once Hunterstown - Lincoln 115 kV congestion relieved, 5E (b2992) delivers expected benefits


TPA Ex. TJH-AA1
Page 19 of 31
Hunterstown - Lincoln 115kV Congestion Decreases 5E Benefits


- Construction Status
- Design and engineering - 95\% complete
- Construction scheduled to begin March 2020, with an expected 6/1/2021 in-service date
- Cost Update

| Baseline \# | Costs (Direct \& Indirect)* |  |
| :---: | ---: | :---: |
| b2992.1 | Reconductor Conastone-Graceton 2323/2324 Circuits | $\$ 18,487,474$ |
| b2992.2 | Bundle Conductor Graceton-Bagley-Raphael Road 2305/2313 Circuits | $\$ 20,306,088$ |
| b2992.3 | Remove Windy Edge - Glenarm 110512 Substation Limitations | $\$ 237,592$ |
| b2992.4 | Reconductor Raphael Road - Northeast 2315/2337 Circuits | $\$ 9,264,714$ |
|  | Total In-Service Cost | $\$ 48,295,868$ |

* A $2.5 \%$ inflation rate was used to escalate costs to in-service date
- Reevaluation of 201617_1-5E (b2992.1-4) project completed
- PJM Staff will recommend keeping 5E (b2992) in the RTEP pending approval by the PJM Board of HL_622, reconductoring of Hunterstown - Lincoln 115 kV.
- Reevaluation of projects b2697, b2976, b2931 completed
- All projects pass the 1.25 threshold
- Results included in Appendix C
- This concludes the 2019 Reevaluation process


## Alternative IEC East Portion of the IEC Project

 (Transource 9A)- IEC Project (Transource 9A) Details
- https://www.transourceenergyprojects.com/IndependenceEnergyConnection/
- PJM Baseline \# b2743, b2752
- Original application
- In December 2017, Transource filed CPCN applications to build the IEC Project (Transource 9A) before the Maryland Public Service Commission (MD Commission) and Pennsylvania Public Utility Commission (PA Commission).
- Proposed Alternatives
- In the course of the regulatory proceedings, alternative reconfigurations of the IEC Project (Transource 9A) were introduced by various parties.
- PJM analyzed these alternative routes to assess reliability and market efficiency impacts.
- In addition to the IEC Project (Transource 9A), an Alternative IEC East Portion of the IEC Project has been filed as part of a proposed settlement in the pending proceedings before the MD and PA Commissions


##  Analysis and Next Steps

- PJM assessed the IEC Project (Transource 9A) inclusive of the Alternative IEC East Portion:
- In Service Cost: \$496.17 million
- Benefits: $\$ 844.81$ million
- B/C Ratio: 1.60
- Satisfies all PJM Reliability criteria
- PJM staff will present the IEC Project
(Transource 9A) inclusive of the Alternative IEC East Portion at the December Board meeting
- Request approval conditioned upon MD Commission approval and PA Commission
 approval

Note: Map from https://www.transourceenergyprojects.com/IndependenceEnergyConnection/

# Appendix A <br> Bosserman - Trail Creek Sensitivities 

B/C Ratio Sensitivities: Bosserman - Trail Creek

| Sensitivity | BT_481 | BT_129 |
| :---: | :---: | :---: |
| Project Cost (\$MM) | 24.69 | 29.51 |
| Base Case | 2.63 | 1.91 |
| FSA Included | 5.13 | 4.4 |
| High Load | 3.12 | 3.19 |
| Low Load | 3.73 | 2.78 |
| High Gas | 3.62 | 3.03 |
| Low Gas | 2.26 | 1.96 |
| Outage Library 1 | 4.62 | 3.78 |
| Outage Library 2 | 3.87 | 3.38 |
| Outage Library 3 | 4.21 | 3.25 |
| Outage Library 4 | 4.62 | 3.94 |
| Outage Library 5 | 3.62 | 3.50 |
| FE Reactivations | 4.62 | 3.95 |

Note: B/C ratios computed using Independent Cost / Constructability Review

## Appendix B

Hunterstown - Lincoln 115 kV Top5 Proposals Sensitivities


| Sensitivity | HL_622 | HL_469 | HL_007 | HL_293 | HL_960 |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Project Cost (\$MM) | 7.21 | 7.15 | 8.26 | 8.4 | 11.92 |
| Base Case | 76.41 | 72.61 | 48.78 | 47.97 | 44.39 |
| FSA Included | 8.87 | 10.34 | 6.23 | 6.12 | 5.81 |
| High Load | 85.23 | 82.35 | 61.85 | 60.82 | 50.73 |
| Low Load | 74.61 | 75.94 | 58.09 | 57.12 | 42.63 |
| High Gas | 65.13 | 63.37 | 45.99 | 45.23 | 36.05 |
| Low Gas | 74.58 | 74.06 | 50.15 | 49.31 | 44.10 |
| Outage Library 1 | 75.96 | 77.16 | 51.80 | 50.94 | 47.26 |
| Outage Library 2 | 81.62 | 81.75 | 59.40 | 58.41 | 49.56 |
| Outage Library 3 | 68.25 | 67.00 | 47.22 | 46.43 | 40.96 |
| Outage Library 4 | 86.68 | 85.71 | 60.21 | 59.21 | 50.96 |
| Outage Library 5 | 76.48 | 76.33 | 53.31 | 52.42 | 45.54 |
| FE Reactivations | 59.45 | 60.03 | 41.92 | 41.23 | 35.56 |

# Appendix C 2019 Reevaluation Results Proposals b2697, b2976, b2931 

TPA Ex. TJH-AA1
Reevaluation Results b2697, b2976, b2931

- Overview
- Projects with capital cost under $\$ 20$ million are reevaluated using the original benefits* and updated capital costs.
- Capital costs updated as of 11/13/2019
- 2019 Reevaluation B/C ratios for b2697, b2976, b2931
$\left.\begin{array}{|c|c|c|c|c|c|c|c|c|c|c|c|}\hline \begin{array}{c}\text { PJM Window } \\ \text { Project ID }\end{array} & \text { Baseline\# } & \text { Type } & \text { Area } & \text { Constraint } & \begin{array}{c}\text { Initial } \\ \text { TEAC } \\ \text { Date }\end{array} & \begin{array}{c}\text { Initial } \\ \text { Capital Cost } \\ \text { ( } \$ \text { million) }\end{array} & \begin{array}{c}\text { Initial } \\ \text { B/C Ratio }\end{array} & \begin{array}{c}\text { Current } \\ \text { Status }\end{array} & \begin{array}{c}\text { Projected } \\ \text { ISD }\end{array} & \begin{array}{c}\text { Updated } \\ \text { Capital } \\ \text { Cost }\end{array} & \begin{array}{c}\text { 2019 } \\ \text { Reevaluation } \\ \text { B/C Ratio }\end{array} \\ \hline 201415 \_1-41 & \text { b2697.1-2 } & \text { Upgrade } & \text { AEP } & \begin{array}{c}\text { Fieldale to } \\ \text { Thornton } 138 \\ \text { kV }\end{array} & 9 / 10 / 2015 & \$ 0.75 & 101.19 & \text { EP } & \begin{array}{c}1 / 1 / 2019 \\ 2: 12 / 06\end{array} & \$ 21 / 2019 & \$ 2.70\end{array}\right\} 28.11$

EP - Engineering Procurement
*Original benefits are the benefits that were determined when the projects were initially approved

- V1 - 11/11/2019 - Original slides posted
- V2-11/13/2019
- Slide 12: Added clarifying note:
- **Capability in terms of line ratings increase / Flexibility in terms of dynamic flow control
- Slide 21: Added
- Reevaluation of projects b2697, b2976, b2931 completed
- All projects pass the 1.25 threshold
- Results included in Appendix C
- This concludes the 2019 Reevaluation process
- Added slides 29,30
- Appendix C - Reevaluation Results b2697, b2976, b2931
- V3 - 11/26/2019 - Corrected typo for MISO Cost Allocation on slide \#5


# Market Efficiency Update 

Nick Dumitriu<br>Sr. Lead Engineer, Market Simulation<br>Transmission Expansion Advisory Committee<br>December 12, 2019

## 2018/19 Market Efficiency Window

- Four drivers identified:
- Hunterstown - Lincoln 115 kV
- HL_622, baseline b3145, rebuild the Hunterstown-Lincoln 115 kV line, was approved by the PJM Board of Managers for inclusion in the RTEP
- Marblehead $\mathrm{N} 161 / 138 \mathrm{kV}$ Transformer
- No proposed project met B/C criteria in either region
- Monroe - Wayne 345kV
- No proposed project effectively resolved congestion
- Bosserman - Trail Creek 138kV
- BT_481, baseline b3142, rebuilding Michigan City to Trail Creek to Bosserman 138kV lines, received provisional approval by the PJM Board of Managers, pending approval by the MISO Board as well
- Analysis is completed, concluding the 2018/19 Market Efficiency Cycle


# Congestion Relief in South-Central Pennsylvania and Northern Maryland 

- Following the November TEAC, PJM performed additional RTEP analyses
- RTEP analyses included:
- Project 9A + Project 5E + and Project H-L
- Alternative Project 9A + Project 5E + Project H-L
- PJM's RTEP analyses have determined that in the combinations described:
- projects exceed the benefit/cost ratio of 1.25
- significantly reduce congestion; and
- solve reliability criteria violations identified in study year 2023
- 2014/2015 Long-Term Window: PJM Board approved baseline project b2743/2752 in Aug 2016
- Transource Independence Energy Connection (IEC) Project (Project 9A)
- Pending CPCN proceedings in Maryland and Pennsylvania
- Proposed settlement: if approved by states, western part of Project 9A stays the same, but there would be an alternative configuration to a portion of the eastern part of Project 9A (the Alternative IEC East Portion)
- 2016/2017 RTEP Long-Term Window: PJM Board approved baseline project b2992 in Apr 2018
- Conastone/Graceton/Bagley/Raphael upgrades in BGE (Project 5E)
- 2018/2019 RTEP Long-Term Window: PJM Board approved baseline project b3145 in Dec 2019
- Rebuild Hunterstown-Lincoln 115 kV line (Project H-L)


## TPA Ex. TJH-AA2 Page 7 of 10 <br> Summary of Recent RTEP Analyses

|  | RTEP Analyses | Date Presented | Benefit to Cost Ratio |
| :---: | :---: | :---: | :---: |

- Baseline project b3145 (Project H-L) included in the RTEP
- rebuild Hunterstown-Lincoln 115 kV line
- Board approved in December 2019
- Baseline project b2992 (Project 5E) remains in the RTEP
- Conastone/Graceton/Bagley/Raphael 230 kV upgrades
- Board approved in April 2018
- Transource Project 9A (b2743.2-8, b2752.1-9)
- Project 9A - exceeds $1.25 \mathrm{~B} / \mathrm{C}$ ratio and remain in RTEP
- Alternative Project 9A - exceeds $1.25 \mathrm{~B} / \mathrm{C}$ ratio
- PJM Board of Managers approved Alternative Project 9A subject to the Maryland Public Service Commission's and the Pennsylvania Public Utility Commission's approval of the Alternative Project 9A through their respective Certificate of Public Convenience and Necessity proceedings


## Questions?

- V1 - 12/09/2019 - Original slides posted

Instructions
1 - Add simulation data to "Sim. Results" tab using the format in the example
2 - Update "Project Details" table within the "Setup" tab. Each Project (4 years) is assigned a group. The Base (Comparison group), Cost, ISD should be added 3 - Results displayed on BC_CA (Benefit Cost - Cost Allocation) Results tab. Use Cell "D4" to switch from one project to another.
4 - All formulas will automatically update

Reporting Data Inputs

| Reporting Variable | Description | Report Agent | Calculation Granularity Variable (TPL) |  | Promod Txt Files Calculation Granularity Variable |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Total Demand Cost | MW ${ }_{\text {Bus }}$ LMP $_{\text {dus }}$ | Promod Report Agent | Monthly/Hourly | Demand $\gg$ Bus Level Demand Costs | *. BUS | Hourly | DEMNDCST |
| Generator Production Cost | Fuel + O\&M + Emissions | Promod Report Agent | Monthiy/Hourly | Generating Units >> Costs >> Total Variable Production Costs By Unit | *.UNT | Hourly | UCST |
| Merchant Transaction Value | FWR on Line $\times$ LMP.orm | Promod Report Agent | Hourly | LMP >> Locational Marginal Price (\$/MWH) <br> FWR >> Constant (input) | *.BUS | Hourly | MBC |
| Hourly Interchange | PJM generation - PJM Load - PJM Losses | Promod Report Agent | Hourly | LMP >> Locational Marginal Price (\$/MWH) | *.TRN | Hourly | Tariffs |

## Spreadsheet Tabs

## Tab

Sim.Results
Setup
BC_CA Results
NLP Analysis
PRDCSt Analysis

Purpose
Enter results from simulation. Format and layout must be preserved for spreadsheet to update appropriately
Only the "Project Details" table should be updated
Results based on "NLP Analysis" and "PRDCst Analysis" calculations. No changes should be made to this sheet, except the Project Group Selection (Cell "D4").
Net Load Payment Analysis. Calculates trend-line for each zone, and determines the in-between year calculated net load payment benefits
Adjusted Production Cost Analysis Payment Analysis. Calculates trend-line for each zone, and determines the in-between year calculated net load payment benefits

| Benefit Cost Test | Project |  | Sensitivity |  | Case |  |  | Basecase |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  | ME PJM Base | 3 S2 v2019-07-26 | 201819ME | Base Re | ove All S2 v2019-07-26 |
| Project Group | B |  |  |  |  |  |  |  |  |  |
|  | Benefits Allocation |  | Benefits Dollars (\$Millions) |  | Weighted Benefits Dollars (\$Millions) |  | Project Result |  |  |  |
| Criteria | NLP | APC | NLP | APC | NLP | APC | Benefits (\$Millions) | B/C | Pass | Breakeven (\$Millions) |
| < 500 kV | 100\% | 0\% | \$844.8 | \$149.86 | \$844.81 | \$0.00 | \$844.81 | 66 | TRUE | \$635.58 |
| $345-\mathrm{kV} \mathrm{DC} \mathrm{and}>=500 \mathrm{kV}$ | 50\% | 50\% | \$844.8 | \$149.86 | \$422.40 | \$74.93 | \$497.33 | 0.98 | FALSE | \$374.17 |


| Cost Variables |  |
| :--- | ---: |
| Project Capital Cost | $\$ 478.48$ |
| Annual Revenue Requirement $(\$ / \mathrm{Yr})$ | $\$ 56.75$ |
| Present Value of Payments | $\$ 508.79$ |

## Cost Allocation:

| ZONE | 2019 NSPL <br> (MW) | NLP \% | $<500 \mathrm{kV}$ | $\begin{gathered} 345-\mathrm{kV} \mathrm{DC} \text { and } \\ >=500 \mathrm{kV} \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: |
| $345-\mathrm{kV} \mathrm{DC} \mathrm{and}>=500 \mathrm{kV}$ | 50\% | 50\% |  |  |
| Total: | 161361.5 |  |  |  |
| AECO | 2591.3 | 0.00\% | \$0.00 | \$4.09 |
| AEP | 22739.0 | 9.92\% | \$50.50 | \$61.10 |
| APS | 9342.2 | 7.13\% | \$36.29 | \$32.87 |
| BGE | 6626.5 | 12.65\% | \$64.35 | \$42.62 |
| COMED | 21349.4 | 0.00\% | \$0.00 | \$33.66 |
| DAY | 3337.2 | 1.11\% | \$5.66 | \$8.09 |
| DEOK | 5194.9 | 0.00\% | \$0.00 | \$8.19 |
| DOM | 21232.0 | 48.08\% | \$244.62 | \$155.78 |
| DPL | 4002.3 | 0.00\% | \$0.00 | \$6.31 |
| DUQ | 2795.1 | 0.00\% | \$0.00 | \$4.41 |
| EKPC | 3430.8 | 0.84\% | \$4.25 | \$7.53 |
| FE-ATSI | 12824.5 | 0.00\% | \$0.00 | \$20.22 |
| JCPL | 5976.5 | 0.00\% | \$0.00 | \$9.42 |
| METED | 3027.8 | 0.00\% | \$0.00 | \$4.77 |
| NEPTHVDC | 660.0 | 0.00\% | \$0.00 | \$1.04 |
| OVEC | 140.5 | 0.04\% | \$0.19 | \$0.32 |
| PECO | 8607.9 | 0.00\% | \$0.00 | \$13.57 |
| PENELEC | 2997.2 | 0.00\% | \$0.00 | \$4.73 |
| PEPCO | 6412.0 | 20.23\% | \$102.93 | \$61.58 |
| PLGRP | 7681.3 | 0.00\% | \$0.00 | \$12.11 |
| PSEG | 9978.3 | 0.00\% | \$0.00 | \$15.73 |
| RECO | 414.8 | 0.00\% | \$0.00 | \$0.65 |


|  | Project |  | Sensitivity |  | Case |  | Basecase |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Benefit Cost Test | CA3 |  | 201819ME PJM Base CA3 S2 v2019-07-26 |  |  |  |  | 201819ME PJM Base Remove All S2 v2019-07-26 |  |  |
| Project Group | B |  |  |  |  |  |  |  |  |  |
|  | Benefits Allocation |  | Benefits Dollars (\$Millions) |  | Weighted Benefits Dollars (\$Millions) |  | Project Result |  |  |  |
| Criteria | NLP | APC | NLP | APC | NLP | APC | Benefits (\$Millions) | B/C | Pass | Breakeven (\$Millions) |
| < 500 kV | 100\% | 0\% | \$844.8 | \$149.86 | \$844.81 | \$0.00 | \$844.81 | 1.60 | TRUE | \$635.58 |
| $345-\mathrm{kV} \mathrm{DC} \mathrm{and}>=500 \mathrm{kV}$ | 50\% | 50\% | \$844.8 | \$149.86 | \$422.40 | \$74.93 | \$497.33 | 0.94 | FALSE | \$374.17 |


| Cost Variables |  |
| :--- | ---: |
| Project Capital Cost | $\mathbf{4 9 6 . 1 7}$ |
| Annual Revenue Requirement $(\$ / \mathrm{Yr})$ | $\$ 58.85$ |
| Present Value of Payments | $\$ 527.60$ |

## Cost Allocation:

| ZONE | $2019 \text { NSPL }$ <br> (MW) | NLP \% | $<500 \mathrm{kV}$ | $\begin{gathered} 345-\mathrm{kV} \mathrm{DC} \\ \text { and }>=500 \mathrm{kV} \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: |
| $345-\mathrm{kV} \mathrm{DC} \mathrm{and}>=500 \mathrm{kV}$ | 50\% | 50\% |  |  |
| Total: | 161361.5 |  |  |  |
| AECO | 2591.3 | 0.00\% | \$0.00 | \$4.24 |
| AEP | 22739.0 | 9.92\% | \$52.36 | \$63.36 |
| APS | 9342.2 | 7.13\% | \$37.63 | \$34.09 |
| BGE | 6626.5 | 12.65\% | \$66.73 | \$44.20 |
| COMED | 21349.4 | 0.00\% | \$0.00 | \$34.90 |
| DAY | 3337.2 | 1.11\% | \$5.87 | \$8.39 |
| DEOK | 5194.9 | 0.00\% | \$0.00 | \$8.49 |
| DOM | 21232.0 | 48.08\% | \$253.66 | \$161.54 |
| DPL | 4002.3 | 0.00\% | \$0.00 | \$6.54 |
| DUQ | 2795.1 | 0.00\% | \$0.00 | \$4.57 |
| EKPC | 3430.8 | 0.84\% | \$4.41 | \$7.81 |
| FE-ATSI | 12824.5 | 0.00\% | \$0.00 | \$20.97 |
| JCPL | 5976.5 | 0.00\% | \$0.00 | \$9.77 |
| METED | 3027.8 | 0.00\% | \$0.00 | \$4.95 |
| NEPTHVDC | 660.0 | 0.00\% | \$0.00 | \$1.08 |
| OVEC | 140.5 | 0.04\% | \$0.20 | \$0.33 |
| PECO | 8607.9 | 0.00\% | \$0.00 | \$14.07 |
| PENELEC | 2997.2 | 0.00\% | \$0.00 | \$4.90 |
| PEPCO | 6412.0 | 20.23\% | \$106.74 | \$63.85 |
| PLGRP | 7681.3 | 0.00\% | \$0.00 | \$12.56 |
| PSEG | 9978.3 | 0.00\% | \$0.00 | \$16.31 |
| RECO | 414.8 | 0.00\% | \$0.00 | \$0.68 |


| Project Alias | Project Group-Year-Zone | Base Group-Year-Zone | Demand Zone | Load Payment | ARR Valuation |  | Net Load Payment | Production Cost | Interchange Value | Adjusted Production Cost |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 201819ME PJM Base Remove All S2 v2 | A2019aECO | A2019aECO | AECO | 241196076.6 | -275694.19 |  | 241471770.8 | 136830663.3 | -29785295.86 | 107045367.5 |
| 201819ME PJM Base Remove All 52 v 2 | A2019AEP | A2019AEP | AEP | 3257455472 | -18096837.08 |  | 3275552309 | 3105185128 | -29785295.86 | 3075399833 |
| 201819ME PJM Base Remove All 52 v 2 | A2019APS | A2019APS | APS | 1253636083 | 20270759.34 |  | 1233365324 | 1388763557 | -29785295.86 | 1358978262 |
| 201819ME PJM Base Remove All S2 v2 | A2019bge | A2019BGE | bGE | 859057000.8 | 1585284.72 |  | 857471716.1 | 223115733.7 | -29785295.86 | 193330437.9 |
| 201819ME PJM Base Remove All 52 v 2 | A2019COMED | A2019COMED | COMED | 2477209558 | 3255963.74 |  | 2473953594 | 1614465709 | -29785295.86 | 1584680413 |
| 201819ME PJM Base Remove All 52 v 2 | A2019DAY | A2019DAY | DAY | 444860117 | 142259.62 |  | 444717857.4 | 44405696.48 | -29785295.86 | 14620400.62 |
| 201819ME PJM Base Remove All 52 v 2 | A2019DEOK | A2019DEOK | DEOK | 675080093.8 | 6105089.92 |  | 668975003.9 | 496914497.5 | -29785295.86 | 467129201.6 |
| 201819ME PJM Base Remove All 52 v 2 | A2019DOM | A2019DOM | DOM | 2520882262 | 1166396.58 |  | 2509715866 | 1485163933 | -29785295.86 | 1455378637 |
| 201819ME PJM Base Remove All 52 v 2 | A2019DPL | A2019DPL | DPL | 467071069.3 | -383285.85 |  | 467454355.1 | 124443490.9 | -29785295.86 | 94658195.07 |
| 201819ME PJM Base Remove All 52 v 2 | A2019DUQ | A2019DUQ | DUQ | 350777619.7 | 319701.33 |  | 350457918.4 | 106087392.2 | -29785295.86 | 76302096.34 |
| 201819ME PJM Base Remove All 52 v 2 | A2019EKPC | A2019EKPC | EKPC | 273205001.1 | 83736.2 |  | 273121264.9 | 222091528 | -29785295.86 | 192306232.1 |
| 201819ME PJM Base Remove All 52 v 2 | A2019FE-ATSI | A2019FE-ATSI | FE-ATSI | 1703693408 | 5226728.29 |  | 1698466680 | 1010110025 | -29785295.86 | 980324729.2 |
| 201819ME PJM Base Remove All 52 v 2 | A2019JCPL | A2019JCPL | JCPL | 548955031.2 | -270861.77 |  | 549225893 | 140804804.9 | -29785295.86 | 111019509.1 |
| 201819ME PJM Base Remove All S2 v2 | A2019METED | A2019METED | METED | 384337234.3 | 1484367.24 |  | 382852867 | 355612458 | -29785295.86 | 325827162.1 |
| 201819ME PJM Base Remove All 52 v 2 | AZO19NEPTHVDC | A2019NEPTHNDC | NEPTHVDC | 140912121.3 | 0 |  | 140912 121.3 | 0 | -29785295.86 | -29785295.86 |
| 201819ME PJM Base Remove All S2 v2 | A20190VEC | A20190VEC | OVEC | 13583004.44 |  | 0 | 13583004.44 | 288478983.5 | -29785295.86 | 258693687.7 |
| 201819ME PJM Base Remove All 52 v 2 | A2019PECO | A2019PECO | PECO | 1016367575 | -70085.26 |  | 1016437660 | 953642440.1 | -29785295.86 | 924057144.3 |
| 201819ME PJM Base Remove All 52 v 2 | A2019PENELEC | A2019PENELEC | PENELEC | 427554818.2 | 572787.77 |  | 426982030.4 | 1084981709 | -29785295.86 | 1055196413 |
| 201819ME PJM Base Remove All S2 v2 | A2019PEPCO | A2019PEPCO | PEPCO | 829567536.8 | 6544255.28 |  | 823023281.5 | 215592708 | -29785295.86 | 185807412.1 |
| 201819ME PJM Base Remove All S2 v2 | A2019PLGRP | A2019PLGRP | PLGRP | 1002630099 | 1845135.16 |  | 1000984964 | 1230988040 | -29785295.86 | 1201202744 |
| 201819ME PJM Base Remove All 52 v 2 | A2019PSEG | A2019PSEG | PSEG | 1084299946 | -2912886.17 |  | 1067212832 | 975474338.7 | -29785295.86 | 945689042.8 |
| 201819 ME PJM Base Remove All S2 v2 | A2019RECO | A2019RECO | RECO | 37832193.84 | 108111.11 |  | 37724082.72 | 0 | -29785295.86 | -29785295.86 |
| 201819ME PJM Base Remove All S2 v2 | A20192PJMIMP | A20192PJMIMP | 2PJMIMP | 0 | 0 |  | 0 | 216177954.7 | -29785295.86 | 186392658.8 |
| 201819ME PJM Base Remove All 52 v 2 | A2023AECO | A2023AEC0 | AECO | 312122640.8 | -234286.84 |  | 312356927.5 | 163865358.1 | -42950569.4 | 120914788.7 |
| 201819ME PJM Base Remove All S2 v2 | A2023AEP | A2023AEP | AEP | 4139967985 | -23410701.51 |  | 4163378686 | 3665154596 | -42950569.4 | 3622204027 |
| 201819ME PJM Base Remove All S2 v2 | A2023APS | A2023APS | APS | 1643446996 | 16992314.64 |  | 1626454682 | 1682255019 | -42950569.4 | 1639304450 |
| 201819ME PJM Base Remove All 52 v 2 | A2023BGE | A2023BGE | BGE | 1086040842 | 2757677.02 |  | 1083283165 | 330467062.9 | -42950569.4 | 287516493.5 |
| 201819ME PJM Base Remove All 52 v 2 | A2023COMED | A2023COMED | COMED | 3104438256 | 2727956.36 |  | 3101710300 | 1959017376 | -42950569.4 | 1916066807 |
| 201819ME PJM Base Remove All S2 v2 | A2023DAY | A2023DAY | DAY | 560601692.8 | 22996.36 |  | 560578696.4 | 69352356.56 | -42950569.4 | 26401787.16 |
| 201819ME PJM Base Remove All S2 v2 | A2023DEOK | A2023DEOK | DEOK | 853337848.9 | 3013182.34 |  | 850324666.5 | 607314437.3 | -42950569.4 | 564363867.9 |
| 201819ME PJM Base Remove All 52 v 2 | A202300M | A2023DOM | DOM | 3343739727 | 11353912.24 |  | 3332385815 | 2012464103 | -42950569.4 | 1969513534 |
| 201819ME PJM Base Remove All S2 v2 | A2023DPL | A2023DPL | DPL | 618709361.2 | 393497.15 |  | 618315864 | 74178977.3 | -42950569.4 | 31228407.9 |
| 201819ME PJM Base Remove All S2 v2 | A2023DUQ | A2023DUQ | DUQ | 439991338.2 | 551475.48 |  | 440542813.7 | 182469100.5 | -42950569.4 | 139518531.1 |
| 201819ME PJM Base Remove All 52 v 2 | A2023EKPC | A2023EKPC | EKPC | 344259923 | -24739.85 |  | 344284662.9 | 299838497.7 | -42950569.4 | 256887928.3 |
| 201819ME PJM Base Remove All S2 v2 | A2023FE-ATSI | A2023FE-ATSI | FE-ATSI | 2148752542 | 863626.69 |  | 2147888915 | 1344418721 | -42950569.4 | 1301468152 |
| 201819ME PJM Base Remove All S2 v2 | A2023JCPL | A2023JCPL | JCPL | 717775437.1 | 628103.62 |  | 717147333.5 | 122506985.3 | -42950569.4 | 79556415.89 |
| 201819ME PJM Base Remove All 52 v 2 | A2023METED | A2023METED | METED | 509760623.8 | 863118.39 |  | 508897505.4 | 355851349.9 | -42950569.4 | 312900780.5 |
| 201819ME PJM Base Remove All 52 v 2 | A2023NEPTHVDC | A2023NEPTHVDC | NEPTHVDC | 187461015.5 | 0 |  | 187461015.5 | 0 | -42950569.4 | -42950569.4 |
| 201819ME PJM Base Remove All 52 v 2 | A20230VEC | A20230VEC | OVEC | 16943122.75 | 0 |  | 16943122.75 | 363664621.7 | -42950569.4 | 320714052.3 |
| 201819ME PJM Base Remove All S2 v2 | A2023PECO | A2023PECO | PECO | 1360827706 | -586468.72 |  | 1361414175 | 983647780.6 | -42950569.4 | 940697211.2 |
| 201819ME PJM Base Remove All 52 v 2 | A2023PENELEC | A2023PENELEC | PENELEC | 542425550.9 | -786535.8 |  | 543212086.8 | 1453606332 | -42950569.4 | 1410655762 |
| 201819ME PJM Base Remove All 52 v 2 | A2023PEPCO | A2023PEPCO | PEPCO | 1041162673 | 5276137.31 |  | 1035886536 | 269558059.5 | -42950569.4 | 226607490.1 |
| 201819ME PJM Base Remove All S2 v2 | A2023PLGRP | A2023PLGRP | PLGRP | 1329646208 | 3323567.8 |  | 1326322640 | 1471094679 | -42950569.4 | 1428144110 |
| 201819ME PJM Base Remove All 52 v 2 | A2023PSEG | A2023PSEG | PSEG | 1395410596 | -1461716.95 |  | 1396872313 | 1036325104 | -42950569.4 | 993374535 |
| 201819ME PJM Base Remove All 52 v 2 | A2023RECO | A2023RECO | RECO | 48517050.65 | 42975.24 |  | 48474075.4 | 0 | -42950569.4 | -42950569.4 |
| 201819ME PJM Base Remove All S2 v2 | A20232PJMMM | A20232PJMMP | 2 PJMMP | 0 | 0 |  | 0 | 240755607.2 | -42950569.4 | 197805037.8 |
| 201819ME PJM Base Remove All 52 v 2 | A2026aECO | A2026AECO | AECO | 344436744.3 | 418418.79 |  | 344855163 | 202223348.6 | -56061101.45 | 146162247.1 |
| 201819ME PJM Base Remove All 52 v 2 | A2026AEP | A2026AEP | AEP | 4775808874 | -27633875.22 |  | 4803442750 | 4109978732 | . 56061101.45 | 4053917631 |
| 201819ME PJM Base Remove All 52 v 2 | A2026APS | A2026APS | APS | 1892785286 | 22379135.49 |  | 1870406150 | 1870488010 | . 56061101.45 | 1814426908 |


| 201819ME PJM Base Remove All S2 v2 | A2026BGE |
| :---: | :---: |
| 201819ME PJM Base Remove All S2 v2 | A2026COMED |
| 201819ME PJM Base Remove All S2 v2 | A2026DAY |
| 201819ME PJM Base Remove All S2 v2 | A2026DEOK |
| 201819ME PJM Base Remove All S2 v2 | A202600M |
| 201819ME PJM Base Remove All S2 v2 | A2026DPL |
| 201819ME PJM Base Remove All S2 v2 | A20260ua |
| 201819ME PJM Base Remove All S2 v2 | A2026EKPC |
| 201819ME PJM Base Remove All S2 v2 | A2026FE-ATSI |
| 201819ME PJM Base Remove All S2 v2 | A2026JCPL |
| 201819ME PJM Base Remove All S2 v2 | A2026METED |
| 201819ME PJM Base Remove All S2 v2 | A2026NEPTHVDC |
| 201819ME PJM Base Remove All S2 v2 | A20260VEC |
| 201819ME PJM Base Remove All S2 v2 | A2026PECO |
| 201819ME PJM Base Remove All S2 v2 | A2026PENELEC |
| 201819ME PJM Base Remove All S2 v2 | A2026PEPCO |
| 201819ME PJM Base Remove All S2 v2 | A2026PLGRP |
| 201819ME PJM Base Remove All S2 v2 | A2026PSEG |
| 201819ME PJM Base Remove All S2 v2 | A2026RECO |
| 201819ME PJM Base Remove All S2 v2 | A20262PJMIMP |
| 201819ME PJM Base Remove All S2 v2 | A2029aECO |
| 201819ME PJM Base Remove All S2 v2 | A2029AEP |
| 201819ME PJM Base Remove All S2 v2 | A2029APS |
| 201819ME PJM Base Remove All S2 v2 | A2029BGE |
| 201819ME PJM Base Remove All S2 v2 | A2029COMED |
| 201819ME PJM Base Remove All S2 v2 | A2029Day |
| 201819ME PJM Base Remove All S2 v2 | A2029DEOK |
| 201819ME PJM Base Remove All S2 v2 | A2029DOM |
| 201819ME PJM Base Remove All S2 v2 | A2029DPL |
| 201819ME PJM Base Remove All S2 v2 | A20290UQ |
| 201819ME PJM Base Remove All S2 v2 | A2029EKPC |
| 201819ME PJM Base Remove All S2 v2 | A2029FE-ATSI |
| 201819ME PJM Base Remove All S2 v2 | A2029JCPL |
| 201819ME PJM Base Remove All S2 v2 | A2029METED |
| 201819ME PJM Base Remove All S2 v2 | A2029NEPTHVDC |
| 201819ME PJM Base Remove All S2 v2 | A20290VEC |
| 201819ME PJM Base Remove All S2 v2 | A2029PECO |
| 201819ME PJM Base Remove All S2 v2 | A2029PENELEC |
| 201819ME PJM Base Remove All S2 v2 | A2029PEPCO |
| 201819ME PJM Base Remove All S2 v2 | A2029PLGRP |
| 201819ME PJM Base Remove All S2 v2 | A2029PSEG |
| 201819ME PJM Base Remove All S2 v2 | A2029RECO |
| 201819ME PJM Base Remove All S2 v2 | A2029zPJMIMP |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019AECO |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019AEP |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019APS |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019bGE |
| 201819ME PJM Base CA3 52 v2019-07 | B2019COMED |
| 201819ME PJM Base CA3 52 v2019-07 | B2019DAY |


| A2026BGE |
| :---: |
| A2026COMED |
| A2026DAY |
| A2026DEOK |
| A2026DOM |
| A2026DPL |
| A2026DUQ |
| A2026EKPC |
| A2026FE-ATSI |
| A2026JCPL |
| A2026METED |
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| A20260VEC |
| A2026PECO |
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| A2026PEPCO |
| A2026PLGRP |
| A2226PSEG |
| A2026RECO |
| A20262PJMIMP |
| A2029AECO |
| A2029AEP |
| A2029APS |
| A2029BGE |
| A2029COMED |
| A2029DAY |
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| A202900M |
| A2029DPL |
| A2029DUQ |
| A2029EKPC |
| A2029FE-ATSI |
| A2029JCPL |
| A2029METED |
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| A2029PEPCO |
| A2029PLGRP |
| A2029PSEG |
| A2029RECO |
| A20292PJMIMP |
| A2019AECO |


| BGE |
| :---: |
| COMED |
| DAY |
| DEOK |
| DOM |
| DPL |
| DUQ |
| EKPC |
| FE-ATSI |
| JCPL |
| METED |
| NEPTHVDC |
| OVEC |
| PECO |
| PENELEC |
| PEPCO |
| PLGRP |
| PSEG |
| RECO |
| ZPJMMP |
| AECO |
| AEP |
| APS |
| BGE |
| COMED |
| DAY |
| DEOK |
| DOM |
| DPL |
| DUQ |
| EKPC |
| FEATSI |
| JCPL |
| METED |
| NEPTHVDC |
| OVEC |
| PECO |
| PENELEC |
| PEPCO |
| PLGRP |
| PSEG |
| RECO |
| ZPJMIMP |
| AECO |
| AEP |
| APS |
| BGE |
| COMED |
| DAY |


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| 59574.45 | 644888717.7 | 83949488.6 | -56061101.45 | 27888387.15 |
| 6111943.17 | 979116325.9 | 674142768.1 | -56061101.45 | 618081666.7 |
| 11993654.82 | 3858283054 | 2362749065 | -56061101.45 | 2306687963 |
| 1349276.12 | 693949505.8 | 75827326.91 | -56061101.45 | 19766225.46 |
| -123039.77 | 498348087 | 207139612.3 | -56061101.45 | 151078510.9 |
| -12430.96 | 395138039.3 | 332493439.3 | -56061101.45 | 276432337.9 |
| 4743041.47 | 2442955243 | 1537840350 | -56061101.45 | 1481779249 |
| 368108.72 | 794371141.7 | 138601059.2 | -56061101.45 | 82539957.7 |
| 1486412.61 | 574605781.5 | 409132213.4 | . 56061101.45 | 353071111.9 |
| 0 | 207435501.1 | 0 | -56061101.45 | -56061101.45 |
| 0 | 19184709.57 | 400855036.3 | -56061101.45 | 344793934.9 |
| -1441709.11 | 1527646412 | 1101758044 | -56061101.45 | 1045696943 |
| 352221.52 | 610304568 | 1621767074 | -56061101.45 | 1565705972 |
| 6378739.47 | 1175119468 | 299792100.6 | -56061101.45 | 243730999.1 |
| 3516013.55 | 1481561155 | 1683488159 | -56061101.45 | 1627427058 |
| -3823032.47 | 1547437663 | 1179786100 | -56061101.45 | 1123724998 |
| 105780.41 | 54410421.17 | 0 | -56061101.45 | -56061101.45 |
| 0 | 0 | 265911026.2 | . 56061101.45 | 209849924.8 |
| -517597.77 | 383296648 | 240718969.1 | -66041269.92 | 174677699.2 |
| -33423029.27 | 5493479971 | 4682634697 | -66041269.92 | 4616593428 |
| 24390003.9 | 2134023039 | 2087380762 | -66041269.92 | 2021339493 |
| 3293932.45 | 1372592350 | 394207279 | -66041269.92 | 328166009.1 |
| 5925230.46 | 4099833336 | 2397760626 | -66041269.92 | 2331719356 |
| 46154.3 | 734238473.1 | 112476508.9 | -66041269.92 | 46435238.99 |
| 7716652.92 | 1118713940 | 744798241.9 | -66041269.92 | 678756971.9 |
| 12484330.52 | 4430193494 | 2747178674 | -66041269.92 | 2681137404 |
| -195853.13 | 784669418.6 | 89044892.11 | - 66041269.92 | 23003622.19 |
| -189552.56 | 560313043.5 | 232829333.8 | -66041269.92 | 166788063.9 |
| 76196.35 | 447900180.3 | 374811708.4 | -66041269.92 | 308770438.5 |
| 5747751.7 | 2760088942 | 1722829160 | -66041269.92 | 1656787890 |
| 275815.91 | 888836421.5 | 164147260.1 | -66041269.92 | 98105990.18 |
| 1976278.99 | 655257016.2 | 478778662.5 | -66041269.92 | 412737392.6 |
| 0 | 230412458.1 | 0 | -66041269.92 | -66041269.92 |
| 0 | 21500555.94 | 440822391 | -66041269.92 | 374781121.1 |
| -1315518.79 | 1730507003 | 1225535195 | -66041269.92 | 1159493925 |
| 167680.02 | 681607467 | 1800132419 | -66041269.92 | 1734091149 |
| 7154379.49 | 1324084360 | 359025599 | -66041269.92 | 292984329.1 |
| 4470115.18 | 1669325198 | 1914631745 | -66041269.92 | 1848590475 |
| -4883634.23 | 1724883943 | 1317943736 | -66041269.92 | 1251902466 |
| 125525.22 | 60337483.52 | 0 | -66041269.92 | -66041269.92 |
| 0 | 0 | 298613985.1 | -66041269.92 | 232572715.2 |
| -113246.57 | 245039165.3 | 149622651.7 | -31872785.09 | 117749866.6 |
| -19377463 | 3273121054 | 3091269972 | $-31872785.09$ | 3059397187 |
| 3683898.83 | 1231182743 | 1376351428 | -31872785.09 | 1344478643 |
| 3918961.79 | 851542851.5 | 220254259.3 | -31872785.09 | 188381474.2 |
| 2998415.6 | 2478330693 | 1613649356 | -31872785.09 | 1581776570 |
| 39877.5 | 444630203 | 42239230.06 | -31872785.09 | 10366444.97 |


| 201819ME PJM Base CA3 S2 v2019-07 | B2019DEOK | A2019DEOK |
| :---: | :---: | :---: |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019DOM | A201900M |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019DPL | A2019DPL |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019DUQ | A20190UQ |
| 201819ME PJM Base CA3 52 v2019-07 | B2019EKPC | A2019EKPC |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019FE-ATS | A2019FE-ATSI |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019.JPL | A2019.CPL |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019METED | A2019METED |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019NEPTHVDC | A2019NEPTHVDC |
| 201819ME PJM Base CA3 S2 v2019-07 | B20190VEC | A20190VEC |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019PECO | A2019PECO |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019PENELEC | A2019PENELEC |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019PEPCO | A2019PEPCO |
| 201819ME PJM Base CA3 S2 v2019-07 | B2019PLGRP | A2019PLGRP |
| 201819ME PJM Base CA3 52 v2019-07 | B2019PSEG | A2019PSEG |
| 201819ME PJM Base CA3 52 v2019-07 | B2019RECO | A2019RECO |
| 201819ME PJM Base CA3 S2 v2019-07 | B20192PJMMP | A20192PJMIMP |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023AECO | A2023AECO |
| 201819ME PJM Base CA3 52 v2019-07 | B2023AEP | A2023AEP |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023APS | A2023APS |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023BGE | A2023BGE |
| 201819ME PJM Base CA3 \$2 v2019-07 | B2023COMED | A2023COMED |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023DAY | A2023DAY |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023DEOK | A2023DEOK |
| 201819ME PJM Base CA3 52 v2019-07 | 82023DOM | A2023DOM |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023DPL | A2023DPL |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023DUQ | A2023DUQ |
| 201819ME PJM Base CA3 52 v2019-07 | B2023EKPC | A2023EKPC |
| 201819ME PJM Base CA3 52 v2019-07 | B2023FE-ATSI | A2023FE-ATS! |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023JCPL | A2023JCPL |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023METED | A2023METED |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023NEPTHVDC | A2023NEPTHVDC |
| 201819ME PJM Base CA3 S2 v2019-07 | B20230VEC | A20230VEC |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023PECO | A2023PECO |
| 201819ME PJM Base CA3 52 v2019-07 | B2023PENELEC | A2023PENELEC |
| 201819ME PJM Base CA3 52 v2019-07 | B2023PEPCO | A2023PEPCO |
| 201819ME PJM Base CA3 S2 v2019-07 | B2023PLGRP | A2023PLGRP |
| 201819ME PJM Base CA3 52 v2019-07 | B2023PSEG | A2023PSEG |
| 201819ME PJM Base CA3 52 v2019-07 | B2023RECO | A2023RECO |
| 201819ME PJM Base CA3 52 v2019-07 | B20232PJMMP | A2023zPJMIMP |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026AECO | A2026AECO |
| 201819ME PJM Base CA3 52 v2019-07 | B2026AEP | A2026AEP |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026APS | A2026APS |
| 201819ME PJM Base CA3 52 v2019-07 | B2026BGE | A2026BGE |
| 201819ME PJM Base CA3 52 v2019-07 | B2026COMED | A2026COMED |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026DAY | A2026DAY |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026DEOK | A2026DEOK |
| 201819ME PJM Base CA3 52 v2019-07 | B2026DOM | A2026DOM |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026DPL | A2026DPL |


| DEOK | 674769389.5 | 2747089.98 | 672022299.5 | 496369820.6 | -31872785.09 | 464497035.5 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| DOM | 2482118245 | 3227878.71 | 2478890366 | 1358983308 | -31872785.09 | 1327110523 |
| DPL | 474291055.1 | -48889.12 | 474339944.2 | 155544011 | -31872785.09 | 123671225.9 |
| dua | 351061973.9 | 75701.23 | 350986272.7 | 108397020.8 | -31872785.09 | 76524235.67 |
| EKPC | 273139882.5 | 119096.49 | 273020786 | 221342388.8 | -31872785.09 | 189469603.7 |
| FE-ATSI | 1705398724 | 1989735.03 | 1703408989 | 1002338082 | -31872785.09 | 970465297.1 |
| JCPL | 557876602.5 | -203524.76 | 558080127.3 | 149900806.3 | -31872785.09 | 118028021.2 |
| METED | 389038494.1 | 241020.72 | 388797473.4 | 367476310.2 | -31872785.09 | 335603525.1 |
| NEPTHVDC | 142962754.4 | 0 | 142962754.4 | 0 | -31872785.09 | -31872785.09 |
| OVEC | 13572006.34 | 0 | 13572006.34 | 286257343.1 | -31872785.09 | 254384558 |
| PECO | 1033076691 | 828727.89 | 1032247963 | 1013448363 | -31872785.09 | 981575577.7 |
| PENELEC | 430921242.7 | -353520.35 | 431274763 | 1106205704 | -31872785.09 | 1074332919 |
| PEPCO | 814453586.6 | 3355201.61 | 811098384.9 | 180139667.9 | -31872785.09 | 148266882.8 |
| PLGRP | 1017567631 | 189685.61 | 1017377945 | 1284313750 | -31872785.09 | 1252440965 |
| PSEG | 1080829469 | -1236088.06 | 1082065557 | 1009287966 | -31872785.09 | 977415180.8 |
| RECO | 38003341.61 | 62652.39 | 37940689.22 | 0 | -31872785.09 | -31872785.09 |
| 2PJMMP | 0 | 0 | 0 | 215977626.8 | -31872785.09 | 184104841.8 |
| AECO | 315298740.5 | -68839.44 | 315367579.9 | 173597228.9 | 44476686.9 | 129120542 |
| AEP | 4133998862 | -24686515.29 | 4158685378 | 3660912267 | -44476686.9 | 3616435580 |
| APS | 1624040615 | 797361.28 | 1623243253 | 1678606510 | -4446686.9 | 1634129823 |
| BGE | 1080442237 | 3096152.59 | 1077346084 | 326844450.9 | 44476686.9 | 282367764 |
| COMED | 3108258769 | 2785942.13 | 3105472827 | 1958244749 | 44476686.9 | 1913768062 |
| DAY | 560023254.7 | -68465.14 | 560091719.9 | 69187701.59 | . 44476686.9 | 24711014.69 |
| DEOK | 852314004.1 | 633597.99 | 851680406.1 | 607074608 | -4476686.9 | 562597921.1 |
| DOM | 3305325347 | 5154675.49 | 3300170672 | 1925873640 | 44476686.9 | 1881396953 |
| DPL | 624557432.2 | 639885.55 | 623917546.7 | 84180686.57 | . 44476686.9 | 39703999.67 |
| DUQ | 440200260.3 | -644797.5 | 440845057.8 | 182630938.4 | 44476686.9 | 138154251.5 |
| EKPC | 343809868.9 | -19247.81 | 343829116.7 | 298839982.2 | 44476686.9 | 254363295.3 |
| FE-ATSI | 2149945651 | -1189109.12 | 2151134760 | 1348012611 | 44476686.9 | 1303535924 |
| JCPL | 725074052.7 | 485128.78 | 724588923.9 | 127425240.6 | 44476686.9 | 82948553.74 |
| METED | 514663507.7 | -359519.7 | 515023027.4 | 377031096.2 | -44476686.9 | 332554409.3 |
| NEPTHVDC | 188469995.8 | 0 | 188469995.8 | 0 | 44476686.9 | -44476686.9 |
| OVEC | 16923315.49 | 0 | 16923315.49 | 363531047.6 | 44476686.9 | 319054360.7 |
| PECO | 1374804213 | 151645.11 | 1374652568 | 1019453138 | -44476686.9 | 974976451.5 |
| PENELEC | 545724868.2 | -1753204.29 | 547478072.5 | 1458092431 | -4476686.9 | 1413615744 |
| PEPCO | 1027966660 | 2936864.45 | 1025029796 | 236973178.4 | 44476686.9 | 192496494.5 |
| PLGRP | 1343689899 | 1816811.42 | 1341873087 | 1520302436 | 44476686.9 | 1475825749 |
| PSEG | 1409828223 | 171854 | 1409656369 | 1052446196 | -44476686.9 | 1007969509 |
| RECO | 48844125.76 | 22834.35 | 48821291.42 | 0 | 44476686.9 | -44476686.9 |
| ZPJMIMP | 0 | 0 | 0 | 240680508.6 | . 44476686.9 | 196203821.7 |
| AECO | 347985539.3 | -206179.57 | 348191718.9 | 212122782.3 | -58234980.14 | 153887802.1 |
| AEP | 4763935292 | -29251987.65 | 4793187279 | 4097660931 | -58234980.14 | 4039425950 |
| APS | 1865251851 | 1378122.53 | 1863873729 | 1864010987 | -58234980.14 | 1805776007 |
| BGE | 1240734788 | 1670316.01 | 1209064471 | 346832351.9 | -58234980.14 | 288597371.8 |
| COMED | 3587031874 | 4352572.73 | 3582679302 | 2175897711 | -58234980.14 | 2117662731 |
| DAY | 643693501.6 | -51201.51 | 643744703.1 | 81829441 | -58234980.14 | 23594460.86 |
| DEOK | 983133459.6 | 3322320.69 | 979811138.8 | 673726032 | -58234980.14 | 615491051.9 |
| DOM | 3819637815 | 6602264.14 | 3813035551 | 2257460575 | -58234980.14 | 2199225595 |
| DPL | 701269420 | 1400447.9 | 699868972.1 | 90062602.07 | -58234980. 14 | 31827621.93 |


| 201819ME PJM Base CA3 S2 v2019-07 | B2026DUQ |
| :--- | :---: |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026EKPC |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026FE-ATSI |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026JCPL |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026METED |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026NEPTHVC |
| 201819ME PJM Base CA3 S2 v2019-07 | B20260VEC |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026PECO |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026PENELEC |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026PEPCO |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026PLGRP |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026PSEG |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026RECO |
| 201819ME PJM Base CA3 S2 v2019-07 | B2026ZPMMMP |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029AECO |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029AEP |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029APS |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029BGE |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029COMED |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029DAY |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029DEOK |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029DOM |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029DPL |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029DUQ |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029EKPC |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029FE-ATSI |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029JCPL |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029METED |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029NEPTHVCC |
| 201819ME PJM Base CA3 S2 v2019-07 | B20290vEC |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029PECO |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029PENELEC |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029PEPCO |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029PLGRP |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029PSEG |
| 201819ME PJM Base CA3 S2 v2019-07 | B2029RECO |
| 201819ME PJM Base CA3 S2 v2019-07 | B20292PJMIMP |
|  |  |



Do not modify $\rightarrow$ Project Group
Do notmodify ---> Base Group

## ISD

Project RTEP Year
Variable Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment Net Load Payment

Net Load Payment Benefits From Simulation

| B | PJM NLP Benefit | 38,270,636 |  |  | 33,744,190 |  | 29,217,744 |  | 24,691,298 |  | 20,164,851 |  | 9,061,790 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| A | Project Grp | 82019 |  |  | B2020 |  | 82021 |  | B2022 |  | B2023 |  | B2024 |
|  | BaseGrp | A2019 |  |  | A2020 |  | A2021 |  | A2022 |  | A2023 |  | A2024 |
|  | Intercept Year | 2019 |  |  | 2019 |  | 2019 |  | 2019 |  | 2023 |  | 2023 |
| 2023 | slopefintercept | 1 |  |  | 1 |  | 1 |  | 1 |  | 2 |  | 2 |
| 2023 | Model Year | 1 |  | 0 |  |  | 0 |  | 0 |  | 2 |  | 0 |
| ME Tool Column | Zone | 2019 |  | $\underline{2020}$ |  |  | $\underline{2021}$ |  | $\underline{2022}$ |  | $\underline{2023}$ |  | $\underline{2024}$ |
| 7 | AECO | \$ | 3,567,395 | \$ | 3,428,209 | \$ | 3,289,023 | \$ | 3,149,838 | \$ | 3,010,652 | \$ | 3,119,287 |
| 7 | AEP | \$ | $(2,431,255)$ | \$ | $(2,996,769)$ | \$ | $(3,562,282)$ |  | $(4,127,795)$ | \$ | $(4,693,309)$ | \$ | $(6,547,363)$ |
| 7 | APS | \$ | $(2,182,581)$ | \$ | $(2,439,793)$ | \$ | $(2,697,005)$ | \$ | $(2,954,216)$ | \$ | $(3,211,428)$ | \$ | $(4,318,426)$ |
| 7 | BGE | \$ | $(5,928,865)$ | \$ | $(5,930,919)$ | \$ | $(5,932,973)$ |  | $(5,935,027)$ | \$ | $(5,937,081)$ | \$ | $(7,745,707)$ |
| 7 | COMED | \$ | 4,377,099 | \$ | 4,223,456 | \$ | 4,069,813 | \$ | 3,916,170 | \$ | 3,762,527 | \$ | 3,056,459 |
| 7 | DAY | \$ | $(87,654)$ | \$ | $(187,485)$ | \$ | $(287,315)$ | \$ | $(387,146)$ | \$ | $(486,977)$ | \$ | $(705,989)$ |
| 7 | DEOK | \$ | 3,047,296 | \$ | 2,624,407 | \$ | 2,201,518 | \$ | 1,778,629 | \$ | 1,355,740 | \$ | 1,135,431 |
| 7 | DOM | \$ | $(30,825,499)$ | \$ | $(31,172,910)$ | \$ | $(31,520,321)$ |  | $(31,867,732)$ |  | $(32,215,143)$ | \$ | $(36,559,263)$ |
| 7 | DPL | \$ | 6,885,589 | \$ | 6,564,612 | \$ | 6,243,636 | \$ | 5,922,659 | \$ | 5,601,683 | \$ | 5,707,611 |
| 7 | DUQ | \$ | 528,354 | \$ | 471,827 | \$ | 415,299 | \$ | 358,772 | \$ | 302,244 | \$ | 162,180 |
| 7 | EKPC | \$ | $(100,479)$ | \$ | $(189,246)$ | \$ | $(278,013)$ | \$ | $(366,779)$ | \$ | $(455,546)$ | \$ | $(597,427)$ |
| 7 | FE-ATSI | \$ | 4,942,309 | \$ | 4,518,193 | \$ | 4,094,077 | \$ | 3,669,961 | \$ | 3,245,845 | \$ | 2,730,413 |
| 7 | JCPL | \$ | 8,854,234 | \$ | 8,501,073 | \$ | 8,147,912 | \$ | 7,794,751 | \$ | 7,441,590 | \$ | 7,921,693 |
| 7 | METED | \$ | 5,944,606 | \$ | 5,989,835 | \$ | 6,035,064 | \$ | 6,080,293 | \$ | 6,125,522 | \$ | 6,295,855 |
| 7 | NEPTHVDC | \$ | 2,050,633 | \$ | 1,790,220 | \$ | 1,529,807 | \$ | 1,269,394 | \$ | 1,008,980 | \$ | 1,174,824 |
| 7 | OVEC | \$ | $(10,998)$ | \$ | $(13,200)$ | \$ | $(15,403)$ | \$ | $(17,605)$ | \$ | $(19,807)$ | \$ | $(26,198)$ |
| 7 | PECO | \$ | 15,810,303 | \$ | 15,167,326 | \$ | 14,524,348 |  | 13,881,371 |  | 13,238,393 | \$ | 13,627,539 |
| 7 | PENELEC | \$ | 4,292,733 | \$ | 4,286,046 | \$ | 4,279,359 | \$ | 4,272,672 | \$ | 4,265,986 | \$ | 4,461,883 |
| 7 | PEPCO |  | $(11,924,897)$ | \$ | $(11,657,858)$ | \$ | $(11,390,818)$ |  | $(11,123,779)$ |  | $(10,856,740)$ | \$ | $(13,341,541)$ |
| 7 | PLGRP | \$ | 16,392,982 | \$ | 16,182,348 | \$ | 15,971,715 |  | 15,761,081 |  | 15,550,447 | \$ | 15,983,015 |
| 7 | PSEG | \$ | 14,852,724 | \$ | 14,335,558 | \$ | 13,818,391 | \$ | 13,301,224 | \$ | 12,784,057 | \$ | 13,166,483 |
| 7 | RECO | \$ | 216,607 | \$ | 249,259 | \$ | 281,911 | \$ | 314,564 | \$ | 347,216 | \$ | 361,032 |
| 7 | zPJMIMP | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |


| --7,041,271 |  |  | -13,144,333 |  | -4,274,856 |  | 4,594,620 |  | 13,464,097 |  | -4,758,792 |  | -8,140,985 | -11,523,177 |  | -14,905,369 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | B2025 |  | B2026 |  | B2027 |  | B2028 |  | B2029 |  | B2030 |  | B2031 |  | B2032 | B2033 |  |
|  | A2025 |  | A2026 |  | A2027 |  | A2028 |  | A2029 |  | A2030 |  | A2031 |  | A2032 | A2033 |  |
|  | 2023 |  | 2026 |  | 2026 |  | 2026 |  | 2029 |  | 2029 |  | 2029 |  | 2029 | 2029 |  |
|  | 2 |  | 3 |  | 3 |  | 3 |  | 4 |  | 4 |  | 4 | 4 |  | 4 |  |
|  | 0 |  | 3 |  | 0 |  | 0 |  | 4 |  | 0 |  | 0 | 0 |  | 0 |  |
|  | $\underline{2025}$ |  | $\underline{2026}$ |  | $\underline{2027}$ |  | 2028 |  | 2029 |  | 2030 |  | $\underline{2031}$ |  | $\underline{2032}$ |  | 2033 |
| \$ | 3,227,921 | \$ | 3,336,556 | \$ | 3,584,633 | \$ | 3,832,709 | \$ | 4,080,786 | \$ | 3,785,619 | \$ | 3,835,493 | \$ | 3,885,366 | \$ | 3,935,239 |
| \$ | $(8,401,416)$ | \$ | $(10,255,470)$ | \$ | $(9,298,744)$ | \$ | $(8,342,017)$ | \$ | $(7,385,291)$ | \$ | $(9,803,747)$ | \$ | $(10,431,993)$ | \$ | $(11,060,239)$ | \$ | $(11,688,485)$ |
| \$ | $(5,425,424)$ | \$ | $(6,532,422)$ | \$ | $(6,444,818)$ | \$ | $(6,357,215)$ | \$ | $(6,269,611)$ | \$ | $(7,252,252)$ | \$ | $(7,722,381)$ | \$ | $(8,192,510)$ | \$ | $(8,662,638)$ |
| \$ | $(9,554,333)$ | \$ | (11,362,959) | \$ | $(11,611,747)$ | \$ | $(11,860,535)$ | \$ | $(12,109,323)$ | \$ | $(12,915,384)$ | \$ | $(13,625,093)$ | \$ | $(14,334,802)$ | \$ | $(15,044,511)$ |
| \$ | 2,350,391 | \$ | 1,644,323 | \$ | 1,871,818 | \$ | 2,099,313 | \$ | 2,326,808 | \$ | 1,583,308 | \$ | 1,332,111 | \$ | 1,080,914 | \$ | 829,717 |
| \$ | $(925,002)$ | \$ | (1,144,015) | \$ | $(1,017,966)$ | \$ | $(891,917)$ | \$ | $(765,868)$ | \$ | $(1,101,187)$ | \$ | $(1,184,675)$ | \$ | $(1,268,164)$ | \$ | $(1,351,652)$ |
| \$ | 915,122 | \$ | 694,813 | \$ | 1,074,625 | \$ | 1,454,438 | \$ | 1,834,250 | \$ | 917,589 | \$ | 775,774 | \$ | 633,959 | \$ | 492,144 |
| \$ | $(40,903,383)$ | \$ | $(45,247,503)$ | \$ | $(44,879,097)$ | \$ | $(44,510,691)$ | \$ | $(44,142,285)$ | \$ | $(47,218,987)$ | \$ | $(48,803,575)$ | \$ | $(50,388,163)$ | \$ | $(51,972,751)$ |
| \$ | 5,813,538 | \$ | 5,919,466 | \$ | 6,528,497 | \$ | 7,137,527 | \$ | 7,746,557 | \$ | 6,958,811 | \$ | 7,031,939 | \$ | 7,105,067 | \$ | 7,178,195 |
| \$ | 22,116 | \$ | $(117,947)$ | \$ | 53,768 | \$ | 225,484 | \$ | 397,200 | \$ | 122,935 | \$ | 96,061 | \$ | 69,186 | \$ | 42,312 |
| \$ | $(739,308)$ | \$ | $(881,188)$ | \$ | $(766,506)$ | \$ | $(651,823)$ | \$ | $(537,140)$ | \$ | $(808,294)$ | \$ | $(863,026)$ | \$ | $(917,757)$ | \$ | $(972,489)$ |
| \$ | 2,214,981 | \$ | 1,699,549 | \$ | 2,586,889 | \$ | 3,474,229 | \$ | 4,361,569 | \$ | 2,899,334 | \$ | 2,784,032 | \$ | 2,668,730 | \$ | 2,553,429 |
| \$ | 8,401,796 | \$ | 8,881,898 | \$ | 9,523,278 | \$ | 10,164,658 | \$ | 10,806,038 | \$ | 10,160,148 | \$ | 10,362,619 | \$ | 10,565,090 | \$ | 10,767,561 |
| \$ | 6,466,187 | \$ | 6,636,520 | \$ | 7,086,955 | \$ | 7,537,389 | \$ | 7,987,824 | \$ | 7,796,311 | \$ | 7,991,562 | \$ | 8,186,813 | \$ | 8,382,063 |
| \$ | 1,340,667 | \$ | 1,506,510 | \$ | 1,745,910 | \$ | 1,985,310 | \$ | 2,224,709 | \$ | 1,821,290 | \$ | 1,842,782 | \$ | 1,864,275 | \$ | 1,885,767 |
| \$ | $(32,589)$ | \$ | $(38,980)$ | \$ | $(34,933)$ | \$ | $(30,885)$ | \$ | $(26,838)$ | \$ | $(36,044)$ | \$ | $(38,111)$ | \$ | $(40,179)$ | \$ | $(42,247)$ |
| \$ | 14,016,685 | \$ | 14,405,831 | \$ | 15,729,276 | \$ | 17,052,722 | \$ | 18,376,168 | \$ | 16,817,186 | \$ | 17,053,622 | \$ | 17,290,059 | \$ | 17,526,496 |
| \$ | 4,657,780 | \$ | 4,853,678 | \$ | 5,300,223 | \$ | 5,746,768 | \$ | 6,193,313 | \$ | 5,956,155 | \$ | 6,139,586 | \$ | 6,323,017 | \$ | 6,506,448 |
| \$ | $(15,826,342)$ | \$ | $(18,311,143)$ | \$ | $(18,804,130)$ | \$ | $(19,297,118)$ | \$ | $(19,790,105)$ | \$ | (20,458,301) | \$ | $(21,369,184)$ | \$ | $(22,280,068)$ | \$ | $(23,190,951)$ |
| \$ | 16,415,583 | \$ | 16,848,151 | \$ | 17,960,130 | \$ | 19,072,108 | \$ | 20,184,087 | \$ | 19,329,404 | \$ | 19,692,097 | \$ | 20,054,791 | \$ | 20,417,484 |
| \$ | 13,548,910 | \$ | 13,931,336 | \$ | 15,120,803 | \$ | 16,310,270 | \$ | 17,499,737 | \$ | 16,189,678 | \$ | 16,437,106 | \$ | 16,684,535 | \$ | 16,931,963 |
| \$ | 374,847 | \$ | 388,663 | \$ | 416,279 | \$ | 443,896 | \$ | 471,512 | \$ | 497,637 | \$ | 522,270 | \$ | 546,903 | \$ | 571,535 |
| \$ |  | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | . |


|  | -18,287,561 |  | -21,669,753 |  | -25,051,946 |  | -28,434,138 |  | -31,816,330 |  | -35,198,522 |  | --38,580,714 |  | --41,962,907 |  | -45,345,099 |  | -48,727,291 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | B2034 |  | B2035 |  | 32036 |  | 82037 |  | B2038 |  | B2039 |  | 82040 |  | 82041 |  | 82042 |  | 82043 |
|  | A2034 |  | A2035 |  | A2036 |  | A2037 |  | A2038 |  | A2039 |  | A2040 |  | A2041 |  | A2042 |  | A2043 |
|  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |
|  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |
|  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |
|  | 2034 |  | 2035 |  | 2036 |  | $\underline{2037}$ |  | $\underline{2038}$ |  | $\underline{2039}$ |  | 2040 |  | 2041 |  | 2042 |  | 043 |
| \$ | 3,985,113 | \$ | 4,034,986 | \$ | 4,084,860 | \$ | 4,134,733 | \$ | 4,184,606 | \$ | 4,234,480 | \$ | 4,284,353 | \$ | 4,334,227 | \$ | 4,384,100 | \$ | 4,433,973 |
| \$ | $(12,316,731)$ | \$ | $(12,944,978)$ | \$ | $(13,573,224)$ | \$ | $(14,201,470)$ | \$ | $(14,829,716)$ | \$ | $(15,457,962)$ | \$ | $(16,086,209)$ | \$ | $(16,714,455)$ | \$ | $(17,342,701)$ | \$ | $(17,970,947)$ |
| \$ | $(9,132,767)$ | \$ | $(9,602,896)$ | \$ | $(10,073,025)$ | \$ | $(10,543,154)$ | \$ | $(11,013,283)$ | \$ | $(11,483,412)$ | \$ | $(11,953,541)$ | \$ | $(12,423,670)$ | \$ | $(12,893,799)$ | \$ | $(13,363,928)$ |
| \$ | (15,754,220) | \$ | $(16,463,929)$ | \$ | $(17,173,638)$ | \$ | $(17,883,347)$ | \$ | $(18,593,056)$ | \$ | $(19,302,765)$ | \$ | $(20,012,474)$ | \$ | $(20,722,183)$ | \$ | $(21,431,892)$ | \$ | $(22,141,601)$ |
| \$ | 578,521 | \$ | 327,324 | \$ | 76,127 | \$ | $(175,070)$ | \$ | $(426,267)$ | \$ | $(677,463)$ | \$ | $(928,660)$ | \$ | $(1,179,857)$ | \$ | $(1,431,054)$ | \$ | $(1,682,251)$ |
| \$ | $(1,435,141)$ | \$ | $(1,518,629)$ | \$ | $(1,602,118)$ | \$ | $(1,685,606)$ | \$ | $(1,769,094)$ | \$ | $(1,852,583)$ | \$ | $(1,936,071)$ | \$ | $(2,019,560)$ | \$ | $(2,103,048)$ | \$ | $(2,186,537)$ |
| \$ | 350,329 | \$ | 208,515 | \$ | 66,700 | \$ | $(75,115)$ | \$ | $(216,930)$ | \$ | $(358,745)$ | \$ | $(500,560)$ | \$ | $(642,375)$ | \$ | $(784,190)$ | \$ | $(926,005)$ |
| \$ | (53,557,339) | \$ | $(55,141,927)$ | \$ | $(56,726,514)$ | \$ | $(58,311,102)$ | \$ | $(59,895,690)$ | \$ | $(61,480,278)$ | \$ | $(63,064,866)$ | \$ | $(64,649,454)$ | \$ | $(66,234,041)$ | \$ | $(67,818,629)$ |
| \$ | 7,251,323 | \$ | 7,324,451 | \$ | 7,397,579 | \$ | 7,470,708 | \$ | 7,543,836 | \$ | 7,616,964 | \$ | 7,690,092 | \$ | 7,763,220 | \$ | 7,836,348 | \$ | 7,909,476 |
| \$ | 15,437 | \$ | $(11,437)$ | \$ | $(38,312)$ | \$ | $(65,186)$ | \$ | $(92,060)$ | \$ | $(118,935)$ | \$ | $(145,809)$ | \$ | $(172,684)$ | \$ | $(199,558)$ | \$ | $(226,432)$ |
| \$ | $(1,027,220)$ | \$ | $(1,081,952)$ | \$ | $(1,136,683)$ | \$ | $(1,191,415)$ | \$ | $(1,246,146)$ | \$ | $(1,300,878)$ | \$ | $(1,355,609)$ | \$ | $(1,410,341)$ | \$ | $(1,465,072)$ | \$ | $(1,519,803)$ |
| \$ | 2,438,127 | \$ | 2,322,825 | \$ | 2,207,524 | \$ | 2,092,222 | \$ | 1,976,920 | \$ | 1,861,619 | \$ | 1,746,317 | \$ | 1,631,015 | \$ | 1,515,714 | \$ | 1,400,412 |
| \$ | 10,970,032 | \$ | 11,172,503 | \$ | 11,374,974 | \$ | 11,577,445 | \$ | 11,779,915 | \$ | 11,982,386 | \$ | 12,184,857 | \$ | 12,387,328 | \$ | 12,589,799 | \$ | 12,792,270 |
| \$ | 8,577,314 | \$ | 8,772,565 | \$ | 8,967,816 | \$ | 9,163,067 | \$ | 9,358,318 | \$ | 9,553,569 | \$ | 9,748,820 | \$ | 9,944,071 | \$ | 10,139,322 | \$ | 10,334,573 |
| \$ | 1,907,260 | \$ | 1,928,752 | \$ | 1,950,245 | \$ | 1,971,737 | \$ | 1,993,230 | \$ | 2,014,722 | \$ | 2,036,215 | \$ | 2,057,707 | \$ | 2,079,200 | \$ | 2,100,692 |
| \$ | $(44,314)$ | \$ | $(46,382)$ | \$ | $(48,449)$ | \$ | $(50,517)$ | \$ | $(52,584)$ | \$ | $(54,652)$ | \$ | $(56,719)$ | \$ | $(58,787)$ | \$ | $(60,854)$ | \$ | $(62,922)$ |
| \$ | 17,762,933 | \$ | 17,999,370 | \$ | 18,235,807 | \$ | 18,472,244 | \$ | 18,708,680 | \$ | 18,945,117 | \$ | 19,181,554 | \$ | 19,417,991 | \$ | 19,654,428 | \$ | 19,890,865 |
| \$ | 6,689,879 | \$ | 6,873,310 | \$ | 7,056,741 | \$ | 7,240,172 | \$ | 7,423,602 | \$ | 7,607,033 | \$ | 7,790,464 | \$ | 7,973,895 | \$ | 8,157,326 | \$ | 8,340,757 |
| \$ | $(24,101,835)$ | \$ | $(25,012,718)$ | \$ | (25,923,601) | \$ | $(26,834,485)$ | \$ | $(27,745,368)$ | \$ | $(28,656,252)$ | \$ | $(29,567,135)$ | \$ | $(30,478,018)$ | \$ | $(31,388,902)$ | \$ | $(32,299,785)$ |
| \$ | 20,780,178 | \$ | 21,142,871 | \$ | 21,505,564 | \$ | 21,868,258 | \$ | 22,230,951 | \$ | 22,593,645 | \$ | 22,956,338 | \$ | 23,319,031 | \$ | 23,681,725 | \$ | 24,044,418 |
| \$ | 17,179,392 | \$ | 17,426,821 | \$ | 17,674,249 | \$ | 17,921,678 | \$ | 18,169,106 | \$ | 18,416,535 | \$ | 18,663,963 | \$ | 18,911,392 | \$ | 19,158,820 | \$ | 19,406,249 |
| \$ | 596,168 | \$ | 620,801 | \$ | 645,433 | \$ | 670,066 | \$ | 694,699 | \$ | 719,331 | \$ | 743,964 | \$ | 768,597 | \$ | 793,229 | \$ | 817,862 |
| \$ | . | \$ | . | \$ | . | \$ | - | \$ | . | \$ | - | \$ | . | \$ | - | \$ | - | \$ |  |


|  | -52,109,483 |
| :---: | :---: |
|  | 82044 |
|  | A2044 |
|  | 2029 |
|  | 4 |
|  | 0 |
|  | 2044 |
| \$ | 4,483,847 |
| \$ | $(18,599,193)$ |
| \$ | $(13,834,056)$ |
| \$ | $(22,851,310)$ |
| \$ | $(1,933,447)$ |
| \$ | $(2,270,025)$ |
| \$ | $(1,067,819)$ |
| \$ | $(69,403,217)$ |
| \$ | 7,982,605 |
| \$ | $(253,307)$ |
| \$ | $(1,574,535)$ |
| \$ | 1,285,110 |
| \$ | 12,994,741 |
| \$ | 10,529,823 |
| \$ | 2,122,185 |
| \$ | $(64,989)$ |
| \$ | 20,127,302 |
| \$ | 8,524,188 |
| \$ | $(33,210,669)$ |
| \$ | 24,407,112 |
| \$ | 19,653,678 |
| \$ | 842,495 |
| \$ |  |

PJM NPV
$-\$ 844,806,909$

TRENDING A

|  |  |  |  |
| :--- | :---: | :---: | :---: |
| ZONE | NLP NPV $(\$)$ | Positive Benefit | $\%$ |
| AECO | $\$ 32,484,390$ | FALSE | $0 \%$ |
| AEP | $(\$ 83,844,189)$ | TRUE | $10 \%$ |
| APS | $(\$ 60,259,292)$ | TRUE | $7 \%$ |
| BGE | $(\$ 106,852,669)$ | TRUE | $13 \%$ |
| COMED | $\$ 16,321,287$ | FALSE | $0 \%$ |
| DAY | $(\$ 9,392,909)$ | TRUE | $1 \%$ |
| DEOK | $\$ 8,068,937$ | FALSE | $0 \%$ |
| DOM | $(\$ 406,173,109)$ | TRUE | $48 \%$ |
| DPL | $\$ 59,451,722$ | FALSE | $0 \%$ |
| DUQ | $\$ 921,199$ | FALSE | $0 \%$ |
| EKPC | $(\$ 7,057,159)$ | TRUE | $1 \%$ |
| FE-ATSI | $\$ 24,433,562$ | FALSE | $0 \%$ |
| JCPL | $\$ 86,471,109$ | FALSE | $0 \%$ |
| METED | $\$ 66,748,001$ | FALSE | $0 \%$ |
| NEPTHVDC | $\$ 14,928,337$ | FALSE | $0 \%$ |
| OVEC | $\$ 312,551)$ | TRUE | $0 \%$ |
| PECO | $\$ 143,605,841$ | FALSE | $0 \%$ |
| PENELEC | $\$ 50,269,773$ | FALSE | $0 \%$ |
| PEPCO | $(\$ 170,915,031)$ | TRUE | $20 \%$ |
| PLGRP | $\$ 166,142,625$ | FALSE | $0 \%$ |
| PSEG | $\$ 138,441,230$ | FALSE | $0 \%$ |
| RECO | $\$ 4,191,912$ | FALSE | $0 \%$ |
| ZPJMIMP | $\$ 0$ | FALSE | $0 \%$ |


| Yr1-Yr2 Slope | Yr2-Yr3 Slope | Yr3-Yr4 Slope | 2019 |
| :---: | :---: | :---: | :---: |
| -139185.52 | 108634.46 | 248076.68 | 3,567,394.5 |
| -565513.36 | -1854053.90 | 956726.55 | -2,431,255.2 |
| -257211.98 | -1106997.68 | 87603.39 | -2,182,580.5 |
| -2054.04 | -1808625.94 | -248787.99 | -5,928,864.6 |
| -153643.02 | -706068.14 | 227495.27 | 4,377,099.1 |
| -99830.52 | -219012.68 | 126048.86 | -87,654.4 |
| -422889.00 | -220308.88 | 379812.43 | 3,047,295.6 |
| -347410.94 | -4344119.80 | 368405.81 | -30,825,499.4 |
| -320976.62 | 105927.88 | 609030.27 | 6,885,589.1 |
| -56527.54 | -140063.85 | 171715.77 | 528,354.3 |
| -88766.82 | -141880.74 | 114682.79 | -100,478.9 |
| -424116.15 | $-515431.70$ | 887339.80 | 4,942,309.1 |
| -353160.96 | 480102.63 | 641379.81 | 8,854,234.3 |
| 45228.93 | 170332.58 | 450434.69 | 5,944,606.4 |
| -260413.20 | 165843.30 | 239399.72 | 2,050,633.1 |
| -2202.29 | -6390.98 | 4047.46 | -10,998.1 |
| -642977.40 | 389145.78 | 1323445.64 | 15,810,303.0 |
| -6686.72 | 195897.35 | 446544.98 | 4,292,732.6 |
| 267039.11 | -2484800.98 | -492987.30 | -11,924,896.6 |
| -210633.51 | 432567.92 | 1111978.51 | 16,392,981.5 |
| -517166.93 | 382426.37 | 1189467.02 | 14,852,724.5 |
| 32652.38 | 13815.55 | 27616.54 | 216,606.5 |
| 0.00 | 0.00 | 0.00 | 0.0 |


| 2 | 3 | 4 | $y=m^{*} x+b$ |  |
| :---: | :---: | :---: | :---: | :---: |
| 2023 | 2026 | 2029 | Slope | Intercept |
| 3,010,652.4 | 3,336,555.8 | 4,080,785.9 | 49,873.4 | -97,457,390.4 |
| -4,693,308.6 | -10,255,470.3 | -7,385,290.7 | -628,246.2 | 1,265,535,994.1 |
| -3,211,428.5 | -6,532,421.5 | -6,269,611.3 | -470,128.9 | 947,109,441.0 |
| $-5,937,080.7$ | -11,362,958.5 | -12,109,322.5 | -709,709.0 | 1,427,793,944.3 |
| 3,762,527.1 | 1,644,322.6 | 2,326,808.4 | -251,196.8 | 511,512,802.6 |
| -486,976.5 | -1,144,014.6 | -765,868.0 | -83,488.4 | 168,380,342.4 |
| 1,355,739.6 | 694,812.9 | 1,834,250.2 | -141,814.9 | 288,801,810.4 |
| -32,215,143.1 | -45,247,502.5 | -44, 142,285.1 | -1,584,587.8 | 3,169,494,287.7 |
| 5,601,682.6 | 5,919,466.3 | 7,746,557.1 | 73,128.1 | -141,491,323.0 |
| 302,244.1 | -117,947.4 | 397,199.9 | -26,874.4 | 54,677,977.9 |
| -455,546.2 | -881,188.5 | -537,140.1 | -54,731.5 | 110,296,588.3 |
| 3,245,844.5 | 1,699,549.4 | 4,361,568.8 | -115,301.6 | 236,961,676.5 |
| 7,441,590.4 | 8,881,898.3 | 10,806,037.7 | 202,470.9 | -400,855,838.1 |
| 6,125,522.1 | 6,636,519.8 | 7,987,823.9 | 195,250.9 | -388,563,030.3 |
| 1,008,980.3 | 1,506,510.2 | 2,224,709.4 | 21,492.5 | -41,808,439.7 |
| -19,807.3 | -38,980.2 | -26,837.8 | -2,067.5 | 4,160,989.3 |
| 13,238,393.4 | 14,405,830.7 | 18,376,167.7 | 236,436.9 | -463,149,622.8 |
| 4,265,985.7 | 4,853,677.8 | 6,193,312.7 | 183,430.9 | -366,408,623.4 |
| -10,856,740.2 | -18,311,143.1 | -19,790,105.1 | -910,883.4 | 1,828,635,034.2 |
| 15,550,447.5 | 16,848,151.2 | 20,184,086.8 | 362,693.4 | -716,938,228.9 |
| 12,784,056.8 | 13,931,335.9 | 17,499,736.9 | 247,428.6 | -486,090,300.6 |
| 347,216.0 | 388,662.7 | 471,512.3 | 24,632.7 | -49,506,688.5 |
| 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

$$
\begin{aligned}
& \text { Do not modify }--- \text { - } \text { Project Group } \\
& \text { Do not modify }- \text { - } \text { Base Group }
\end{aligned}
$$

## ISD

Project RTEP Year
Variable
Adjusted Production Cost
Adjusted Production Cost
Adjusted Production Cost
Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost
Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost
Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost Adjusted Production Cost


Adjusted Production Cost Benefits From Simulation

| -13,075,528 | -13,130,202 | -16,036,742 | -18,943,283 | -21,849,823 | -18,120,449 | -18,397,040 | -18,673,632 | -18,950,224 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 82025 | 82026 | 82027 | B2028 | B2029 | B2030 | B2031 | 82032 | 82033 |
| A2025 | A2026 | A2027 | A2028 | A2029 | A2030 | A2031 | A2032 | A2033 |
| 2023 | 2026 | 2026 | 2026 | 2029 | 2029 | 2029 | 2029 | 2029 |
| 2 | 3 | 3 | 3 | 4 | 4 | 4 | 4 | 4 |
| 0 | 3 | 0 | 0 | 4 | 0 | 0 | 0 | 0 |
| $\underline{2025}$ | $\underline{2026}$ | $\underline{2027}$ | $\underline{2028}$ | 2029 | $\underline{2030}$ | $\underline{2031}$ | $\underline{2032}$ | 2033 |
| \$7,885,621.077 | \$ 7,725,555.000 | \$ 7,791,709.910 | \$ 7,857,864.820 | \$ 7,924,019.730 | \$ 7,033,422.841 | \$ 6,754,025.635 | \$ 6,474,628.430 | \$ 6,195,231.224 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(8,650,901.530) | \$(7,885,188.887) | \$(7,119,476.243) | \$(6,353,763.600) | \$(4,755,334.892) | \$(4,074,570.942) | \$(3,393,806.991) | \$(2,713,043.041) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(8,003,776.850) | \$(5,400,232.360) | \$(2,796,687.870) | \$ (193,143.380) | \$ $(3,014,374.638)$ | \$(2,956,026.444) | \$(2,897,678.250) | \$(2,839,330.056) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(4,293,926.290) | \$(4,056,598.990) | \$(3,819,271.690) | \$(3,581,944.390) | \$ $3,463,748.351$ ) | \$(3,465,243.768) | \$(3,466,739.186) | \$(3,468,234,603) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,590,614.810) | \$(2,786,708.173) | \$(2,982,801.537) | \$ $3,178,894.900)$ | \$ $(2,920,725.218)$ | \$(2,986,606.884) | \$(3,052,488.549) | \$(3,118,370.214) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$12,061,396.470 | \$12,723,945.230 | \$13,386,493.990 | \$14,049,042.750 | \$ 8,015,438.479 | \$ 6,644,251.179 | \$ 5,273,063.879 | \$ 3,901,876.578 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,449,546.060) | \$(2,390,841.987) | \$(2,332,137.913) | \$(2,273,433.840) | \$ $(2,993,983.978)$ | \$(3,259,671.618) | \$(3,525,359.259) | \$(3,791,046.899) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,784,540.590) | \$(2,778,429.610) | \$(2,772,318.630) | \$(2,766,207.650) | \$(2,724,257.498) | \$(2,723,606.208) | \$(2,722,954.918) | \$(2,722,303.628) |
| \$ $(152,013.287)$ | \$ $(1,261,906.090)$ | \$(1,682,092.097) | \$(2,102,278.103) | \$(2,522,464.110) | \$ 780,453.910 | \$ 1,419,490.676 | \$ 2,058,527.442 | \$ 2,697,564.209 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$15,302,492.730 | \$15,548,041.273 | \$15,793,589.817 | \$16,039,138.360 | \$16,939,677.098 | \$18,070,826.113 | \$19,201,975.128 | \$20,333,124.142 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$38,781,447.320 | \$38,418,815.040 | \$38,056,182.760 | \$37,693,550.480 | \$44,437,142.321 | \$47,560,776.221 | \$50,684,410.121 | \$53,808,044.021 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$ $2,173,878.690)$ | \$(2,259,465.873) | \$(2,345,053.057) | \$(2,430,640.240) | \$(2,315,288.770) | \$(2,360,637.876) | \$ (2,405,986.981) | \$(2,451,336.086) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,250,317.360) | \$(2,307,206.560) | \$(2,364,095.760) | \$(2,420,984.960) | \$(1,687,539.298) | \$(1,518,410.327) | \$(1,349,281.356) | \$(1,180,152.385) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$44,693,803.270 | \$49,951,627.333 | \$55,209,451.397 | \$60,467,275.460 | \$51,404,512.010 | \$51,781,003.124 | \$52,157,494.238 | \$52,533,985.351 |
| \$1,335,715.300 | \$ 523,581.910 | \$ 1,290,708.677 | \$ 2,057,835.443 | \$ 2,824,962.210 | \$(3,073,131.331) | \$(4,713,894.691) | \$(6,354,658.051) | \$(7,995,421.411) |
| \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$57,845,703.480 | \$59,895,168.797 | \$61,944,634.113 | \$63,994,099.430 | \$63,234,585.315 | \$64,633,658.263 | \$66,032,731.211 | \$67,431,804.159 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$20,430,430.480 | \$20,475,124.873 | \$20,519,819.267 | \$20,564,513.660 | \$16,433,860.068 | \$15,495,572.410 | \$14,557,284.753 | \$13,618,997.095 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,173,878.690) | \$(2,259,465.873) | \$(2,345,053.057) | \$ $2,430,640.240)$ | \$(2,315,288.770) | \$(2,360,637.876) | \$(2,405,986.981) | \$(2,451,336.086) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,192,749.550) | \$(2,329,521.253) | \$(2,466,292.957) | \$(2,603,064.660) | \$(2,401,139.270) | \$(2,441,126.651) | \$(2,481,114.031) | \$(2,521,101.412) |


| -19,226,815 | -19,503,407 | -19,779,999 | 20,056,590 | -20,333,182 | -20,609,774 | -20,886,365 | -21,162,957 | -21,439,549 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| B2034 | 82035 | B2036 | B2037 | 82038 | 82039 | 82040 | 82041 | 82042 |
| A2034 | A2035 | A2036 | A2037 | A2038 | A2039 | A2040 | A2041 | A2042 |
| 2029 | 2029 | 2029 | 2029 | 2029 | 2029 | 2029 | 2029 | 2029 |
| 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| $\underline{2034}$ | $\underline{2035}$ | $\underline{2036}$ | 2037 | $\underline{2038}$ | $\underline{2039}$ | $\underline{2040}$ | $\underline{2041}$ | 2042 |
| \$ 5,915,834.019 | \$ 5,636,436.813 | \$ 5,357,039.608 | \$ 5,077,642.402 | \$ 4,798,245.197 | \$ 4,518,847.991 | \$ 4,239,450.785 | \$ 3,960,053.580 | \$ 3,680,656.374 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$ $(2,032,279.091)$ | \$(1,351,515.140) | \$ (670,751.190) | \$ 10,012.761 | \$ 690,776.711 | \$ 1,371,540.662 | \$ 2,052,304.612 | \$ 2,733,068.563 | \$ 3,413,832.513 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$ $(2,780,981.863)$ | \$(2,722,633.669) | \$(2,664,285.475) | \$(2,605,937.281) | \$(2,547,589.087) | \$(2,489,240,893) | \$(2,430,892.700) | \$(2,372,544.506) | \$(2,314,196.312) |
| \$(3,469,730.021) | \$ $(3,471,225.438)$ | \$(3,472,720.856) | \$(3,474,216.274) | \$(3,475,711.691) | \$(3,477,207.109) | \$(3,478,702.526) | \$(3,480,197.944) | \$(3,481,693.361) |
| \$(3,184,251.880) | \$(3,250,133.545) | \$(3,316,015.210) | \$(3,381,896.876) | \$(3,447,778.541) | \$(3,513,660.206) | \$(3,579,541.872) | \$(3,645,423.537) | \$(3,711,305.202) |
| \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$ 2,530,689.278 | \$ 1,159,501.978 | \$ $(211,685.322)$ | \$(1,582,872.622) | \$(2,954,059.923) | \$(4,325,247.223) | \$(5,696,434.523) | \$(7,067,621.823) | \$(8,438,809.123) |
| \$(4,056,734.539) | \$(4,322,422.180) | \$(4,588,109.820) | \$(4,853,797.461) | \$(5,119,485.101) | \$ $(5,385,172.742)$ | \$(5,650,860.382) | \$(5,916,548.023) | \$(6,182,235.663) |
| \$ $2,721,652.338)$ | \$ $(2,721,001.048)$ | \$ $(2,720,349.758)$ | \$(2,719,698.468) | \$(2,719,047.178) | \$ $2,718,395.888)$ | \$(2,717,744.598) | \$(2,717,093.308) | \$ $(2,716,442.018)$ |
| \$ 3,336,600.975 | \$ 3,975,637.741 | \$ 4,614,674.507 | \$ 5,253,711.273 | \$ 5,892,748.039 | \$ 6,531,784.805 | \$ 7,170,821.571 | \$ 7,809,858.337 | \$ 8,448,895.104 |
| \$21,464,273.157 | \$22,595,422.171 | \$23,726,571.186 | \$24,857,720.200 | \$25,988,869.215 | \$27,120,018.229 | \$28,251,167.244 | \$29,382,316.258 | \$30,513,465.273 |
| \$56,931,677.920 | \$60,055,311.820 | \$63,178,945.720 | \$66,302,579.620 | \$69,426,213.519 | \$72,549,847.419 | \$75,673,481.319 | \$78,797,115.219 | \$81,920,749.118 |
| \$(2,496,685.192) | \$(2,542,034.297) | \$(2,587,383.402) | \$(2,632,732.508) | \$(2,678,081.613) | \$ $2,723,430.718)$ | \$(2,768,779.823) | \$(2,814,128.929) | \$(2,859,478.034) |
| \$(1,011,023.413) | \$ (841,894.442) | \$ (672,765.471) | \$ (503,636.500) | \$ $(334,507.529)$ | \$ (165,378.557) | \$ 3,750.414 | \$ 172,879.385 | \$ 342,008.356 |
| \$52,910,476.465 | \$53,286,967.579 | \$53,663,458.693 | \$54,039,949.807 | \$54,416,440.921 | \$54,792,932.035 | \$55,169,423.149 | \$55,545,914.263 | \$55,922,405.376 |
| \$ $(9,636,184.770)$ | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$68,830,877.107 | \$70,229,950.054 | \$71,629,023.002 | \$73,028,095.950 | \$74,427,168.898 | \$75,826,241.846 | \$77,225,314.794 | \$78,624,387.742 | \$80,023,460.689 |
| \$12,680,709.437 | \$11,742,421.780 | \$10,804,134.122 | \$ 9,865,846.464 | \$ 8,927,558.806 | \$ 7,989,271.149 | \$ 7,050,983.491 | \$ 6,112,695.833 | \$ 5,174,408.176 |
| \$(2,496,685.192) | \$(2,542,034.297) | \$(2,587,383.402) | \$(2,632,732.508) | \$(2,678,081.613) | \$(2,723,430.718) | \$(2,768,779.823) | \$(2,814,128.929) | \$(2,859,478.034) |
| \$(2,561,088.793) | \$(2,601,076.174) | \$(2,641,063.555) | \$(2,681,050.935) | \$(2,721,038.316) | \$(2,761,025.697) | \$(2,801,013.078) | \$(2,841,000.459) | \$(2,880,987,840) |


| 21,716,141 | -21,992,732 |
| :---: | :---: |
| B2043 | B2044 |
| A2043 | A2044 |
| 2029 | 2029 |
| 4 | 4 |
| 0 | 0 |
| $\underline{2043}$ | 2044 |
| \$ 3,401,259.169 | \$ 3,121,861.963 |
| \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$ 4,094,596.464 | \$ 4,775,360.414 |
| \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$ $(2,255,848.118)$ | \$(2,197,499.924) |
| \$(3,483,188.779) | \$(3,484,684.196) |
| \$(3,777,186.868) | \$(3,843,068.533) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$ $(9,809,996.423)$ | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$(6,447,923.304) | \$(6,713,610.944) |
| \$(2,715,790.728) | \$(2,715,139.438) |
| \$ 9,087,931.870 | \$ 9,726,968.636 |
| \$31,644,614.287 | \$32,775,763.302 |
| \$85,044,383.018 | \$88,168,016.918 |
| \$(2,904,827.139) | \$(2,950,176.245) |
| \$ 511,137.327 | \$ 680,266.298 |
| \$56,298,896.490 | \$56,675,387.604 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$81,422,533.637 | \$82,821,606.585 |
| \$ 4,236,120.518 | \$ 3,297,832.860 |
| \$(2,904,827.139) | \$(2,950,176.245) |
| \$(2,920,975.220) | \$(2,960,962.601) |

TRENDING ANALYSIS

|  | 1 | 2 | 3 | 4 | $y=m^{*} \mathrm{x}+\mathrm{b}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Yr3-Yr4 Slope | 2019 | 2023 | 2026 | 2029 | Slope | Intercept |
| 66154.91 | 10,704,499 | 8,205,753 | 7,725,555 | 7,924,020 | -279,397 | 574,209,750 |
| -801071.05 | -16,002,646 | -5,768,447 | -14,491,680 | -16,894,894 | -262,771 | 518,625,593 |
| 765712.64 | -14,499,619 | -5,174,627 | -8,650,902 | -6,353,764 | 680,764 | $-1,386,706,154$ |
| -2905602.57 | 4,948,964 | -5,148,730 | -12,697,777 | -21,414,585 | -1,671,642 | 3,372,769,401 |
| 2603544.49 | -2,903,843 | -2,298,744 | $-8,003,777$ | -193,143 | 58,348 | -121,461,208 |
| 237327.30 | -4,253,956 | -1,690,772 | -4,293,926 | -3,581,944 | -1,495 | -428,051 |
| -196093.36 | -2,632,166 | -1,765,947 | $-2,590,615$ | $-3,178,895$ | $-65,882$ | 130,819,055 |
| -5764519.90 | -128,268,114 | -88,116,581 | -107,462,368 | -124,755,928 | 53,032 | -219,501,565 |
| 662548.76 | 29,013,031 | 8,475,592 | 12,061,396 | 14,049,043 | $-1,371,187$ | 2,791,525,658 |
| 58704.07 | 222,139 | -1,364,280 | -2,449,546 | $-2,273,434$ | -265,688 | 536,351,926 |
| 6110.98 | -2,836,628 | -2,524,633 | -2,784,541 | -2,766,208 | 651 | -4,046,376 |
| -420186.01 | -9,859,432 | 2,067,772 | -1,261,906 | -2,522,464 | 639,037 | -1,296,464,181 |
| 245548.54 | 7,008,512 | 3,392,138 | 15,302,493 | 16,039,138 | 1,131,149 | -2,279,292,822 |
| -362632.28 | 9,776,363 | 19,653,629 | 38,781,447 | 37,693,550 | 3,123,634 | $-6,296,539,674$ |
| -85587.18 | -2,087,489 | -1,526,118 | -2,173,879 | -2,430,640 | -45,349 | 89,743,395 |
| -56889.20 | -4,309,130 | -1,659,692 | -2,250,317 | -2,420,985 | 169,129 | -345,019,351 |
| 5257824.06 | 57,518,433 | 34,279,240 | 44,693,803 | 60,467,275 | 376,491 | .712,872,449 |
| 767126.77 | 19,136,506 | 2,959,982 | 523,582 | 2,824,962 | -1,640,763 | 3,327,676,489 |
| -4856362.19 | $-37,540,529$ | -34,110,999 | -37,016,751 | -51,585,837 | -1,280,101 | 2,551,180,295 |
| 2049465.32 | 51,238,221 | 47,681,640 | 57,845,703 | 63,994,099 | 1,399,073 | -2,776,883,499 |
| 44694.39 | 31,726,138 | 14,594,974 | 20,430,430 | 20,564,514 | -938,288 | 1,921,157,805 |
| -85587.18 | -2,087,489 | -1,526,118 | -2,173,879 | -2,430,640 | -45,349 | 89,743,395 |
| -136771.70 | $-2,87,817$ | -1,601,216 | -2,192,750 | -2,603,065 | -39,987 | 78,773,244 |

Instructions
1 - Add simulation data to "Sim.Results" tab using the format in the example
2 - Update "Project Details" table within the "Setup" tab. Each Project (4 years) is assigned a group. The Base (Comparison group), Cost, ISD should be added
3 - Results displayed on BC_CA (Benefit Cost - Cost Allocation) Results tab. Use Cell "D4" to switch from one project to another.
4 - All formulas will automatically update

Reporting Data Inputs

| $\frac{\text { Reporting Variable }}{\text { Total Demand Cost }}$ | $\frac{\text { Description }}{\mathrm{MW}_{\text {Bus }} \text { LMP }}$ | Report Agent Promod Report Agent | Calculation Granularity Variable (TPL) |  | Promod Txi files Calculation Granularity Variable |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Monthil/Hourly | Demand >>Bus Level Demand Costs | *.BUS | Hourly | DEMNDCST |
| Generator Production Cost | Fuel + O\&M + Emissions | Promod Report Agent | Monthiy/Hourly | Generating Units >> Costs >> Total Variable Production Costs By Unit | *. UnT | Hourly | UCST |
| Merchant Transaction Value | FWR on Line $\times$ LMP. ${ }_{\text {.fdm }}$ | Promod Report Agent | Hourly | LMP >> Locational Marginal Price (\$/MWH) <br> FWR >> Constant (Input) | *.BUS | Hourly | MBC |
| Houriy Interchange | PJM generation - PJM Load - PJM Losses | Promod Report Agent | Hourly | LMP >> Locational Marginal Price (\$/MWH) | *.tRN | Hourly | Tariff |

## Spreadsheet Tabs

## Purpose

Enter results from simulation. Format and layout must be preserved for spreadsheet to update appropriately
Only the "Project Details" table should be updated
Results based on "NLP Analysis" and "PRDCst Analysis" calculations. No changes should be made to this sheet, except the Project Group Selection (Cell "D4").
Net Load Payment Analysis. Calculates trend-line for each zone, and determines the in-between year calculated net load payment benefits
Adjusted Production Cost Analysis Payment Analysis. Calculates trend-line for each zone, and determines the in-between year calculated net load payment benefits

| Benefit Cost Test | Project |  | Sensitivity |  | Case |  | Basecase |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  | 201819ME PJM Base CA3 S2 1\%LD v2019-07-2¢ 201819ME PJM Base Remove All S2 1\%LD v2019-07-26 |  |  |  |  |  |
| Project Group | B |  |  |  |  |  |  |  |  |  |
|  | Benefits Allocation |  | Benefits Dollars (\$Millions) |  | Weighted Benefits Dollars (\$Millions) |  | Project Result |  |  |  |
| Criteria | NLP | APC | NLP | APC | NLP | APC | Benefits (\$Millions) | B/C | Pass | Breakeven (\$Millions) |
| < 500 kV | 100\% | 0\% | \$771.2 | \$157.95 | \$771.23 | \$0.00 | \$771.23 | . 52 | TRUE | \$580.22 |
| $345-\mathrm{kV} \mathrm{DC} \mathrm{and}>=500 \mathrm{kV}$ | 50\% | 50\% | \$771.2 | \$157.95 | \$385.61 | \$78.97 | \$464.59 | 0.91 | FALSE | \$349.53 |


| Cost Variables |  |
| :--- | ---: |
| Project Capital Cost | $\$ 478.4$ |
| Annual Revenue Requirement $(\$ / \mathrm{Yr})$ | $\$ 56.75$ |
| Present Value of Payments | $\$ 508.79$ |

## Cost Allocation:

| ZONE | $\begin{aligned} & 2019 \text { NSPL } \\ & \text { (MW) } \end{aligned}$ | NLP \% | < 500 kV | $\begin{gathered} 345-\mathrm{kV} \mathrm{DC} \text { and } \\ >=500 \mathrm{kV} \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: |
| $345-\mathrm{kV} \mathrm{DC}$ and > $=500 \mathrm{kV}$ | 50\% | 50\% |  |  |
| Total: | 161361.5 |  |  |  |
| AECO | 2591.3 | 0.00\% | \$0.00 | \$4.09 |
| AEP | 22739.0 | 8.87\% | \$45.15 | \$58.42 |
| APS | 9342.2 | 6.19\% | \$31.50 | \$30.48 |
| BGE | 6626.5 | 12.77\% | \$64.98 | \$42.94 |
| COMED | 21349.4 | 0.00\% | \$0.00 | \$33.66 |
| DAY | 3337.2 | 0.92\% | \$4.67 | \$7.60 |
| DEOK | 5194.9 | 0.00\% | \$0.00 | \$8.19 |
| DOM | 21232.0 | 49.77\% | \$253.23 | \$160.09 |
| DPL | 4002.3 | 0.00\% | \$0.00 | \$6.31 |
| DUQ | 2795.1 | 0.00\% | \$0.00 | \$4.41 |
| EKPC | 3430.8 | 0.72\% | \$3.66 | \$7.24 |
| FE-ATSI | 12824.5 | 0.00\% | \$0.00 | \$20.22 |
| JCPL | 5976.5 | 0.00\% | \$0.00 | \$9.42 |
| METED | 3027.8 | 0.00\% | \$0.00 | \$4.77 |
| NEPTHVDC | 660.0 | 0.00\% | \$0.00 | \$1.04 |
| OVEC | 140.5 | 0.03\% | \$0.17 | \$0.31 |
| PECO | 8607.9 | 0.00\% | \$0.00 | \$13.57 |
| PENELEC | 2997.2 | 0.00\% | \$0.00 | \$4.73 |
| PEPCO | 6412.0 | 20.72\% | \$105.43 | \$62.82 |
| PLGRP | 7681.3 | 0.00\% | \$0.00 | \$12.11 |
| PSEG | 9978.3 | 0.00\% | \$0.00 | \$15.73 |
| RECO | 414.8 | 0.00\% | \$0.00 | \$0.65 |


|  |  |  | Sensitivity |  | Case |  | Basecase |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Benefit Cost Test | CA3 |  |  |  | 201819ME PJM Base CA3 52 1\%LD v2019-07-2t 201819ME PJM Base Remove All S2 1\%LD v2019-07-26 |  |  |  |  |  |
| Project Group | B |  |  |  |  |  |  |  |  |  |
|  | Benefits Allocation |  | Benefits Dollars (\$Millions) |  | Weighted Benefits Dollars (\$Millions) |  | Project Result |  |  |  |
| Criteria | NLP | APC | NLP | APC | NLP | APC | Benefits (\$Millions) | B/C | Pass | Breakeven (\$Millions) |
| < 500 kV | 100\% | 0\% | \$771.2 | \$157.95 | \$771.23 | \$0.00 | \$771.23 | 46 | TRUE | \$580.22 |
| $345-\mathrm{kV} \mathrm{DC} \mathrm{and}>=500 \mathrm{kV}$ | 50\% | 50\% | \$771.2 | \$157.95 | \$385.61 | \$78.97 | \$464.59 | 0.88 | FALSE | \$349.53 |


| Cost Variables |  |
| :--- | ---: |
| Project Capital Cost |  |
| Annual Revenue Requirement $(\$ / \mathrm{Yr})$ | $\$ 58.85$ |
| Present Value of Payments | $\$ 527.60$ |

## Cost Allocation:

| ZONE | 2019 NSPL <br> (MW) | NLP \% | < 500 kV | $\begin{gathered} 345-\mathrm{kV} \text { DC and } \\ >=500 \mathrm{kV} \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: |
| $345-\mathrm{kV} \mathrm{DC} \mathrm{and}>=500 \mathrm{kV}$ | 50\% | 50\% |  |  |
| Total: | 161361.5 |  |  |  |
| AECO | 2591.3 | 0.00\% | \$0.00 | \$4.24 |
| AEP | 22739.0 | 8.87\% | \$46.82 | \$60.58 |
| APS | 9342.2 | 6.19\% | \$32.67 | \$31.61 |
| BGE | 6626.5 | 12.77\% | \$67.38 | \$44.52 |
| COMED | 21349.4 | 0.00\% | \$0.00 | \$34.90 |
| DAY | 3337.2 | 0.92\% | \$4.84 | \$7.88 |
| DEOK | 5194.9 | 0.00\% | \$0.00 | \$8.49 |
| DOM | 21232.0 | 49.77\% | \$262.60 | \$166.01 |
| DPL | 4002.3 | 0.00\% | \$0.00 | \$6.54 |
| DUQ | 2795.1 | 0.00\% | \$0.00 | \$4.57 |
| EKPC | 3430.8 | 0.72\% | \$3.80 | \$7.51 |
| FE-ATSI | 12824.5 | 0.00\% | \$0.00 | \$20.97 |
| JCPL | 5976.5 | 0.00\% | \$0.00 | \$9.77 |
| METED | 3027.8 | 0.00\% | \$0.00 | \$4.95 |
| NEPTHVDC | 660.0 | 0.00\% | \$0.00 | \$1.08 |
| OVEC | 140.5 | 0.03\% | \$0.18 | \$0.32 |
| PECO | 8607.9 | 0.00\% | \$0.00 | \$14.07 |
| PENELEC | 2997.2 | 0.00\% | \$0.00 | \$4.90 |
| PEPCO | 6412.0 | 20.72\% | \$109.32 | \$65.14 |
| PLGRP | 7681.3 | 0.00\% | \$0.00 | \$12.56 |
| PSEG | 9978.3 | 0.00\% | \$0.00 | \$16.31 |
| RECO | 414.8 | 0.00\% | \$0.00 | \$0.68 |


| Project Alias | Project Group-Year-Zone | Base Group-Year-Zone | Demand Zone | Load Payment | ARR Valuation |  | Net Load Payment | Production Cost | Interchange Value | Adjusted Production Cost |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 201819ME PJM Base Remove All S2 19 | A2019AECO | A2019AECO | AECO | 237638162.9 | -262035.75 |  | 237900198.7 | 134781623.5 | -30743208.57 | 104038415 |
| 201819ME PJM Base Remove All S2 19 | A2019AEP | A2019AEP | AEP | 3210747552 | -17997992.07 |  | 3228745544 | 3080508303 | -30743208.57 | 3049765095 |
| 201819ME PJM Base Remove All S2 19 | A2019APS | A2019APS | APS | 1235311362 | 20161345.44 |  | 1215150017 | 1381215002 | -30743208.57 | 1350471793 |
| 201819ME PJM Base Remove All S2 19 | A2019BGE | A2019BGE | BGE | 846030021.4 | 1477039.56 |  | 844552981.8 | 220737256.4 | -30743208.57 | 189994047.8 |
| 201819ME PJM Base Remove All S2 19 | A2019COMED | A2019COMED | COMED | 2441556747 | 3141368.08 |  | 2438415379 | 1604067215 | -30743208.57 | 1573324006 |
| 201819ME PJM Base Remove All S2 $1^{\circ}$ | A2019DAY | A2019DAY | DAY | 438386053.4 | 141118.84 |  | 438244934.6 | 40597163.84 | -30743208.57 | 9853955.27 |
| 201819ME PJM Base Remove All S2 19 | A2019DEOK | A2019DEOK | DEOK | 665371101.3 | 6138058.47 |  | 659233042.9 | 494815605.6 | -30743208.57 | 464072397.1 |
| 201819ME PJM Base Remove All S2 19 | A2019DOM | A2019DOM | DOM | 2484159168 | 11093496.15 |  | 2473065671 | 1457886130 | -30743208.57 | 1427142922 |
| 201819ME PJM Base Remove All S2 $1^{\circ}$ | A2019DPL | A2019DPL | DPL | 460223353.7 | -206296.4 |  | 460429650.1 | 116362253 | -30743208.57 | 85619044.45 |
| 201819ME PJM Base Remove All S2 19 | A2019DUa | A2019DUQ | DUQ | 345751085.4 | 324770.65 |  | 345426314.7 | 104353459.7 | -30743208.57 | 73610251.14 |
| 201819ME PJM Base Remove All S2 19 | A2019EKPC | A2019EKPC | EKPC | 269278078.1 | 89690.68 |  | 269188387.4 | 217599159.5 | -30743208.57 | 186855950.9 |
| 201819ME PJM Base Remove All S2 19, | A2019FE-ATSI | A2019FE-ATSI | FE-ATS! | 1679072913 | 5288647.66 |  | 1673784266 | 994190609.6 | -30743208.57 | 963447401 |
| 201819ME PJM Base Remove All S2 19 | A2019.JCPL | A2019.JPL | JCPL | 540913464.5 | -219953.03 |  | 541133417.5 | 137598331.9 | -30743208.57 | 106855123.4 |
| 201819ME PJM Base Remove All 5219 | A2019METED | A2019METED | METED | 378533982.4 | 1441191.07 |  | 377092791.3 | 350057202.9 | -30743208.57 | 319313994.3 |
| 201819ME PJM Base Remove All S2 19, | A2019NEPTHVDC | AZ019NEPTHVDC | NEPTHVDC | 140394631.9 | 0 |  | 140394631.9 | 0 | -30743208.57 | -30743208.57 |
| 201819ME PJM Base Remove All S2 19 | A20190VEC | A20190VEC | OVEC | 13388329.28 |  | 0 | 13388329.28 | 284675542.3 | -30743208.57 | 253932333.7 |
| 201819ME PJM Base Remove All S2 19 | A2019PECO | A2019PECO | PECO | 1000970243 | -472151.55 |  | 1001442394 | 944658302.5 | -30743208.57 | 913915093.9 |
| 201819ME PJM Base Remove All S2 19 | A2019PENELEC | A2019PENELEC | PENELEC | 421524222.1 | 610130.65 |  | 420914091.5 | 1077401874 | -30743208.57 | 1046658665 |
| 201819ME PJM Base Remove All S2 19, | A2019PEPCO | A2019PEPCO | PEPCO | 817154827 | 6497832.01 |  | 810656995.1 | 206013726.5 | -30743208.57 | 175270517.9 |
| 201819ME PJM Base Remove All S2 19, | A2019PLGRP | A2019PLGRP | PLGRP | 987794658.4 | 1618728.07 |  | 986175930.3 | 1217343437 | -30743208.57 | 1186600228 |
| 201819ME PJM Base Remove All S2 19 | A2019PSEG | A2019PSEG | PSEG | 1049006843 | -2777559.64 |  | 1051784403 | 967484928.3 | -30743208.57 | 936741719.8 |
| 201819ME PJM Base Remove All S2 19, | A2019RECO | A2019RECO | RECO | 37292034.87 | 108105.92 |  | 37183928.94 | 0 | -30743208.57 | -30743208.57 |
| 201819ME PJM Base Remove All S2 19; | A2019zPJMIMP | A2019zPJMIMP | 2 2JMIMP | 0 | 0 |  | 0 | 215070375.2 | -30743208.57 | 184327166.6 |
| 201819ME PJM Base Remove All S2 19; | A2023AECO | A2023AECO | AECO | 307858864.4 | -214804.96 |  | 308073669.3 | 159434440.7 | -44390149.46 | 145044291.3 |
| 201819ME PJM Base Remove All S2 19, | A2023AEP | A2023AEP | AEP | 4081366428 | -23679738.6 |  | 4105046167 | 3629567745 | 44390149.46 | 3585177595 |
| 201819ME PJM Base Remove All S2 19 | A2023APS | A2023APS | APS | 1619157094 | 15417261.29 |  | 1603739833 | 1677313882 | -44390149.46 | 1632923732 |
| 201819ME PJM Base Remove All S2 19 | A2023BGE | A2023BGE | BGE | 1069821277 | 2418173.63 |  | 1067403104 | 325710509.1 | 44390149.46 | 281320359.6 |
| 201819ME PJM Base Remove All S2 19, | A2023COMED | A2023COMED | COMED | 3061147468 | 3011699.27 |  | 3058135768 | 1951283263 | .44390149.46 | 1906893113 |
| 201819ME PJM Base Remove All S2 19, | A2023DAY | A2023DAY | DAY | 552464285.2 | -8754.33 |  | 552473039.5 | 67804374 | -44390149.46 | 23414224.54 |
| 201819ME PJM Base Remove All S2 19 | A2023DEOK | A2023DEOK | DEOK | 841064234.4 | 2757201.01 |  | 838307033.4 | 604956038.7 | . 44390149.46 | 560565889.2 |
| 201819ME PJM Base Remove All S2 19 | A2023D0M | A2023DOM | DOM | 3293449225 | 10232044.52 |  | 3283217180 | 1960602450 | 44390149.46 | 1916212300 |
| 201819ME PJM Base Remove All S2 19, | A2023DPL | A2023DPL | DPL | 610109045.2 | 415321.5 |  | 609693723.8 | 69984789.35 | . 44390149.46 | 25594639.89 |
| 201819ME PJM Base Remove All S2 19, | A2023DUQ | A2023DUQ | DUQ | 433776118.8 | . 536620.08 |  | 434312738.9 | 180946580 | 44390149.46 | 136556430.5 |
| 201819ME PJM Base Remove All S2 19 | A2023EKPC | A2023EKPC | EKPC | 339654365.1 | -22897.79 |  | 339677262.9 | 296703054.9 | -44390149.46 | 252312905.4 |
| 201819ME PJM Base Remove All S2 19, | A2023FE-ATSI | A2023FE-ATSI | FE-ATSI | 2118202478 | 863829.84 |  | 2117338648 | 1334112310 | . 44390149.46 | 1289722161 |
| 201819ME PJM Base Remove All S2 19, | A2023.JPL | A2023JCPL | JCPL | 707709670.7 | 673304.81 |  | 707036365.9 | 115049993.4 | -44390149.46 | 70659843.92 |
| 201819ME PJM Base Remove All S2 19, | A2023METED | A2023METED | METED | 502605673.6 | 689334.56 |  | 501916339.1 | 347415348.8 | . 44390149.46 | 303025199.4 |
| 201819ME PJM Base Remove All S2 19, | A2023NEPTHVDC | A2023NEPTHVDC | NEPTHVDC | 186470655.5 | 0 |  | 186470655.5 | 0 | 44390149.46 | 44390149.46 |
| 201819ME PJM Base Remove All S2 19, | A20230VEC | A20230VEC | OVEC | 16713925.78 | 0 |  | 16713925.78 | 362553362.2 | 44390149.46 | 318163212.7 |
| 201819ME PJM Base Remove All S2 19; | A2023PECO | A2023PECO | PECO | 1342186624 | -705904.58 |  | 1342892528 | 970301644.9 | -44390149.46 | 925911495.5 |
| 201819ME PJM Base Remove All S2 19 | A2023PENELEC | A2023PENELEC | PENELEC | 535467872.3 | -797520.04 |  | 536265392.3 | 1449060355 | . 44390149.46 | 1404670206 |
| 201819ME PJM Base Remove All S2 19, | A2023PEPCO | A2023PEPCO | PEPCO | 1025327156 | 4929294 |  | 1020397862 | 256850035.1 | 44390149.46 | 21245988.6 |
| 201819ME PJM Base Remove All S2 19, | A2023PLGRP | A2023PLGRP | PLGRP | 1311985916 | 3211251.71 |  | 1308774665 | 1446824601 | -44390149.46 | 1402434452 |
| 201819ME PJM Base Remove All S2 19 | A2023PSEG | A2023PSEG | PSEG | 1376959776 | -1263196.24 |  | 1378222972 | 1025440350 | -43390149.46 | 980750201 |
| 201819ME PJM Base Remove All S2 19, | A2023RECO | A2023RECO | RECO | 47908986.33 | 42688.2 |  | 47866298.14 | 0 | 44390149.46 | 44390149.46 |
| 201819ME PJM Base Remove All S2 19, | A2023zPJMIMP | A2023zPJMIMP | 2PJMIMP | 0 | 0 |  | 0 | 240064348.2 | 44390149.46 | 195674198.8 |
| 201819ME PJM Base Remove All S2 19 | A2026AECO | A2026AECO | AECO | 339616824.6 | -396764.35 |  | 340013589 | 198754531.2 | -57681787.54 | 141072743.7 |
| 201819ME PJM Base Remove All S2 19, | A2026AEP | A2026AEP | AEP | 4704146078 | -28019779.4 |  | 4732165858 | 4063195409 | -57681787.54 | 4005513622 |
| 201819ME PJM Base Remove All S2 19 | A2026APS | A2026APS | APS | 1863314883 | 21106652.36 |  | 1842208230 | 1862677028 | -57681787.54 | 1804995240 |


| 201819ME PJM Base Remove All S2 1\% | A2026BGE |
| :---: | :---: |
| 201819ME PJM Base Remove All S2 1; | A2026COMED |
| 201819ME PJM Base Remove All S2 1; | A20260AY |
| 201819ME PJM Base Remove All S2 1; | A20260EOK |
| 201819ME PJM Base Remove All S2 1\% | A2026DOM |
| 201819ME PJM Base Remove All S2 1; | A2026DPL |
| 201819ME PJM Base Remove All 52 19 | A2026DJQ |
| 201819ME PJM Base Remove All S2 1; | A2026EKPC |
| 201819ME PJM Base Remove All S2 19 | A2026FE-ATSI |
| 201819ME PJM Base Remove All S2 19 | A2026JCPL |
| 201819ME PJM Base Remove All S2 19 | A2026METED |
| 201819ME PJM Base Remove All S2 19 | A2026NEPTHVDC |
| 201819ME PJM Base Remove All S2 19 | A20260VEC |
| 201819ME PJM Base Remove All S2 19 | A2026PECO |
| 201819ME PJM Base Remove All S2 19 | A2026PE NELEC |
| 201819ME PJM Base Remove All S2 19 | A2026PEPCO |
| 201819ME PJM Base Remove All S2 19 | A2026PLGRP |
| 201819ME PJM Base Remove All S2 19 | A2026PSEG |
| 201819ME PJM Base Remove All S2 19 | A2026RECO |
| 201819ME PJM Base Remove All S2 19 | A2026zPJMIMP |
| 201819ME PJM Base Remove All S2 19 | A2029AECO |
| 201819ME PJM Base Remove All S2 19 | A2029AEP |
| 201819ME PJM Base Remove All S2 19 | A2029APS |
| 201819ME PJM Base Remove All S2 19 | A2029BGE |
| 201819ME PJM Base Remove All S2 19 | A2029COMED |
| 201819ME PJM Base Remove All S2 19 | A2029day |
| 201819ME PJM Base Remove All S2 19 | A2029DEOK |
| 201819ME PJM Base Remove All S2 19 | A2029D0M |
| 201819ME PJM Base Remove All S2 19 | A20290PL |
| 201819ME PJM Base Remove All S2 19 | A2029DUQ |
| 201819ME PJM Base Remove All S2 19 | A2029EKPC |
| 201819ME PJM Base Remove All S2 19 | A2029FE-ATSI |
| 201819ME PJM Base Remove All S2 19 | A2029JCPL |
| 201819ME PJM Base Remove All S2 19 | A2029METED |
| 201819ME PJM Base Remove All S2 19 | A2029NEPTHVDC |
| 201819ME PJM Base Remove All S2 19 | A20290VEC |
| 201819ME PJM Base Remove All S2 19 | A2029PECO |
| 201819ME PJM Base Remove All S2 19 | A2029PENELEC |
| 201819ME PJM Base Remove All S2 19 | A2029PEPCO |
| 201819ME PJM Base Remove All S2 19 | A2029PLGRP |
| 201819ME PJM Base Remove All S2 19 | A2029PSEG |
| 201819ME PJM Base Remove All S2 19 | A2029RECO |
| 201819ME PJM Base Remove All S2 19 | A2029zPJMIMP |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019AECO |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2019AEP |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019APS |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019bGE |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019COMED |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2019DAY |



| BGE | 1204756555 |
| :---: | :---: |
| COMED | 3533424275 |
| DAY | 635046981.2 |
| DEOK | 970224744.1 |
| DOM | 3809349922 |
| DPL | 685118339.4 |
| DUQ | 490650086.9 |
| EKPC | 389268180.3 |
| FE-ATSI | 2409919566 |
| JCPL | 783667620.6 |
| METED | 567957225.9 |
| NEPTHVDC | 206777355.8 |
| OVEC | 18908141.84 |
| PECO | 1505175760 |
| PENELEC | 601829496.4 |
| PEPCO | 1163253355 |
| PLGRP | 1464735248 |
| PSEG | 1522565679 |
| RECO | 53707091.25 |
| zPJMIMP | 0 |
| AECO | 377163832.1 |
| AEP | 5380098933 |
| APS | 2126530920 |
| BGE | 1355968449 |
| COMED | 4044458646 |
| DAY | 723364599.3 |
| DEOK | 1109824542 |
| DOM | 4378540905 |
| DPL | 772900721.1 |
| OUQ | 551670809.6 |
| EKPC | 441623164.7 |
| FE-ATSI | 2724052877 |
| JCPL | 875945875.7 |
| METED | 647364364.5 |
| NEPTHVDC | 229360716 |
| OVEC | 21193880.75 |
| PECO | 1703917701 |
| PENELEC | 671485406.1 |
| PEPCO | 1312149427 |
| PLGRP | 1649294060 |
| PSEG | 1694851244 |
| RECO | 59563054.33 |
| zPJMIMP | 0 |
| AECO | 241426686.5 |
| AEP | 3206497539 |
| APS | 1216787332 |
| BGE | 842860414.4 |
| COMED | 2445103702 |
| DAY | 438087643.1 |


| 2473179.46 |
| :---: |
| 4749863.09 |
| 24205.79 |
| 5885571.6 |
| 10953378.5 |
| 1097199.48 |
| -150692.12 |
| -13611.84 |
| 461639.04 |
| 376578.04 |
| 1392827.74 |
| 0 |
| 0 |
| -1341474.74 |
| 290068.42 |
| 6172616.83 |
| 3281456.25 |
| -3628685.73 |
| 100278.44 |
| 0 |
| -509067.22 |
| -32904658.75 |
| 24852642.84 |
| 3266712.7 |
| 5946383.64 |
| 64029.16 |
| 7650626 |
| 12390137.72 |
| 203293.48 |
| -172433.38 |
| 71667.29 |
| 5566563.54 |
| 294867.03 |
| 1937634.73 |
| 0 |
| 0 |


| 1202283375 | 350228982 | -57681787.54 | 292547194.5 |
| :---: | :---: | :---: | :---: |
| 3528674412 | 2168238064 | $-57681787.54$ | 2110556277 |
| 635022775.4 | 78090464.02 | -57681787.54 | 20408676.48 |
| 964344172.5 | 671983187.4 | -57681787.54 | 614301399.8 |
| 3798394543 | 2312417292 | -57681787.54 | 2254735504 |
| 684021139.9 | 71066702.56 | -57681787.54 | 13384915.02 |
| 490800779 | 205769655.6 | -57681787.54 | 148087868.1 |
| 389281792.1 | 331244399.4 | $-57681787.54$ | 273562611.9 |
| 2405307927 | 1522893761 | -57681787.54 | 1465211974 |
| 783291042.6 | 133360212.6 | -57681787.54 | 75678425.05 |
| 566564398.2 | 401899587 | -57681787.54 | 344217799.4 |
| 206777355.8 | 0 | -57681787.54 | -57681787.54 |
| 18908141.84 | 401028900.4 | -57681787.54 | 343347112.8 |
| 1506517235 | 1085191329 | -57681787.54 | 1027509541 |
| 601539428 | 1615759585 | -57681787.54 | 1558077798 |
| 1157080738 | 288215077.3 | -57681787.54 | 230533289.7 |
| 1461453792 | 1656816587 | $-57681787.54$ | 1599134799 |
| 1526194365 | 1168143397 | $-57681787.54$ | 1110481610 |
| 53606812.83 | 0 | -57681787.54 | -57681787.54 |
| 0 | 265275671.3 | -57681787.54 | 207593883.7 |
| 377672899.3 | 237128502.5 | -68132891.01 | 168995611.5 |
| 5413003592 | 4630283206 | -68132891.01 | 4562150315 |
| 2101678277 | 2076484051 | -68132891.01 | 2008351160 |
| 1352701736 | 384285046.2 | -68132891.01 | 316152155.2 |
| 4038512262 | 239504826 | -68132891.01 | 2326908935 |
| 723300570.1 | 101220645.1 | -68132891.01 | 33087754.04 |
| 1102173916 | 741096237 | -68132891.01 | 672963346 |
| 4366150767 | 2685904997 | -68132891.01 | 2617772106 |
| 773104014.6 | 83070641.99 | -68132891.01 | 14937750.98 |
| 551843243 | 231546666.8 | -68132891.01 | 163413775.8 |
| 441551497.4 | 373322089.3 | -68132891.01 | 305189198.3 |
| 2718486314 | 1711058679 | -68132891.01 | 1642925788 |
| 875651008.7 | 159088949.1 | -68132891.01 | 90956058.12 |
| 645426729.8 | 472046529.3 | -68132891.01 | 403913638.3 |
| 229360716 | 0 | -68132891.01 | -68132891.01 |
| 21193880.75 | 441104460.4 | -68132891.01 | 372971569.4 |
| 1705236463 | 1206257822 | -68132891.01 | 1138124931 |
| 671357168.7 | 1793849021 | -68132891.01 | 1725716130 |
| 1304916700 | 337284458.3 | -68132891.01 | 269151567.3 |
| 1644930433 | 1881882304 | -68132891.01 | 1813749413 |
| 1699698796 | 1308509232 | -68132891.01 | 1240376341 |
| 59436647.47 | 0 | -68132891.01 | -68132891.01 |
| 0 | 298428577.7 | -68132891.01 | 230295686.7 |
| 241537408.2 | 146511426.5 | -32653688.94 | 113857737.6 |
| 3225785889 | 3062714276 | -32653688.94 | 3030060587 |
| 1212782503 | 1370368855 | -32653688.94 | 1337715166 |
| 838886042.1 | 218594403.9 | $-32653688.94$ | 185940715 |
| 2442206373 | 1603361006 | -32653688.94 | 1570707317 |
| 438050848.1 | $39079003.5 \uparrow$ | -32653688.94 | 6425314.57 |


| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019DEOK | A20190EOK |
| :---: | :---: | :---: |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019DOM | A2019DOM |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019DPL | A2019DPL |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019DUQ | A2019DUQ |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019EKPC | A2019EKPC |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019FE-ATS | A2019FE-ATSI |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019.JCPL | A2019.JCPL |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019METED | A2019METED |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019NEPTHVDC | A2019NEPTHVDC |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B20190VEC | A20190VEC |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019PECO | A2019PECO |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019PENELEC | A2019PENELEC |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2019PEPCO | A2019PEPCO |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019PLGRP | A2019PLGRP |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2019PSEG | A2019PSEG |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2019RECO | A2019RECO |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B20192PJMIMP | A20192PJMIMP |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023AECO | A2023AECO |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023AEP | A2023AEP |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023APS | A2023APS |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2023BGE | A2023BGE |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023COMED | A2023COMED |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023DAY | A2023DAY |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023DEOK | A2023DEOK |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2023D0M | A2023DOM |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B20230PL | A2023DPL |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2023DUQ | A2023DUQ |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023EKPC | A2023EKPC |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023FE-ATSI | A2023FE-ATSI |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023.CPL | A2023JCPL |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2023METED | A2023METED |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2023NEPTHVDC | A2023NEPTHVDC |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B20230VEC | A20230VEC |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2023PECO | A2023PECO |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2023PENELEC | A2023PENELEC |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023PEPCO | A2023PEPCO |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2023PLGRP | A2023PLGRP |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023PSEG | A2023PSEG |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2023RECO | A2023RECO |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2023zPJMIMP | A20232PJMIMP |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2026AECO | A2026AECO |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2026AEP | A2026AEP |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2026APS | A2026APS |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2026BGE | A2026BGE |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2026COMED | A2026COMED |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2026DAY | A2026DAY |
| 201819ME PJM Base CA3 S2 1\%LD V2C | B2026DEOK | A2026DEOK |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2026DOM | A2026DOM |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2026DPL | A2026DPL |


| DEOK | 664918434.4 |
| :---: | :---: |
| DOM | 2447228910 |
| DPL | 467611548.3 |
| DUQ | 345985863.3 |
| EKPC | 269172215.3 |
| FE-ATSI | 1680099954 |
| JCPL | 549797740.6 |
| METED | 383470396.9 |
| NEPTHVDC | 142487332.9 |
| OVEC | 13377629.24 |
| PECO | 1017870557 |
| PENELEC | 424642446.4 |
| PEPCO | 802542640.4 |
| PLGRP | 1002940270 |
| PSEG | 1065560852 |
| RECO | 37460225.42 |
| ZPJMIMP | 0 |
| AECO | 310664788.9 |
| AEP | 4076234550 |
| APS | 1601020097 |
| BGE | 1065601711 |
| COMED | 3063523707 |
| DAY | 551978988.2 |
| DEOK | 840182892 |
| DOM | 3258865000 |
| DPL | 615281143.4 |
| DUQ | 433998979.7 |
| EKPC | 339340543.1 |
| FE-ATSI | 2119188910 |
| JCPL | 714582306.3 |
| METED | 507055695.8 |
| NEPTHVD | 187969436.2 |
| OVEC | 16696154.84 |
| PECO | 1354385693 |
| PENELEC | 538092108 |
| PEPCO | 1014039784 |
| PLGRP | 1324082405 |
| PSEG | 1389148521 |
| RECO | 48156473.3 |
| ZPJMMMP | 0 |
| AECO | 343019768.1 |
| AEP | 4694534143 |
| APS | 1837581563 |
| BGE | 11933317755 |
| DAY | 3535669392 |
| DEOK | 634128159.4 |
| DOM | 968752798.7 |
| DPL | 3761321469 |
| 691204570.4 |  |


| 662182219 | 495263371.5 | -32653688.94 | 462609682.6 |
| :---: | :---: | :---: | :---: |
| 2443640903 | 1324640065 | -32653688.94 | 1291988376 |
| 467471318.5 | 149379025.5 | -32653688.94 | 116725336.5 |
| 345934154.5 | 103308048.1 | -32653688.94 | 70654359.13 |
| 269049097 | 216577798.8 | -32653688.94 | 183924109.8 |
| 1678147417 | 991817654 | -32653688.94 | 959163965.1 |
| 549984687.3 | 146247940.9 | -32653688.94 | 113594252 |
| 383233981.6 | 361015370.7 | -32653688.94 | 328361681.7 |
| 142487332.9 | 0 | -32653688.94 | -32653688.94 |
| 13377629.24 | 281719238.6 | -32653688.94 | 249065549.7 |
| 1017447234 | 1002731682 | -32653688.94 | 970077993.4 |
| 425030015.2 | 1100302499 | -32653688.94 | 1067648810 |
| 799121840.3 | 172599530.8 | -32653688.94 | 139945841.9 |
| 1002798068 | 1271189283 | -32653688.94 | 1238535594 |
| 1066732727 | 1000078236 | -32653688.94 | 967424547.4 |
| 37398155.51 | 0 | -32653688.94 | -32653688.94 |
| 0 | 214778489.5 | -32653688.94 | 182124800.5 |
| 310727110.7 | 167689393.9 | -45866617.13 | 121822776.8 |
| 4100961150 | 3622494670 | -45866617.13 | 3576628053 |
| 1600809331 | 1673554889 | -45866617.13 | 1627688272 |
| 1062553525 | 320658764.3 | 45866617.13 | 274792147.2 |
| 3060618352 | 1950980745 | -45866617.13 | 1905114128 |
| 552062774.6 | 67645938.72 | -45866617.13 | 21779321.59 |
| 839475420.8 | 604898539.5 | -45866617.13 | 559031922.3 |
| 3254564402 | 1865420630 | -45866617.13 | 1819554013 |
| 614631798.5 | 78841190.72 | -45866617.13 | 32974573.59 |
| 434573067 | 181296181.4 | -45866617.13 | 135429564.3 |
| 339342291.7 | 296136336.1 | -45866617.13 | 250269719 |
| 2120015174 | 1335078338 | -45866617.13 | 1289211721 |
| 714122775.7 | 124203741.7 | -45866617.13 | 78337124.55 |
| 507483560.4 | 371160334.6 | -45866617.13 | 325293717.4 |
| 187969436.2 | 0 | -45868617.13 | -45866617.13 |
| 16696154.84 | 362393921 | -45866617.13 | 316527303.9 |
| 1354375659 | 1003322516 | -45866617.13 | 957455899.2 |
| 539832303.7 | 1452447138 | -45866617.13 | 1406580520 |
| 1011057068 | 227978299.2 | -45866617.13 | 182111682.1 |
| 1322457510 | 1504875797 | 45866617.13 | 1459009180 |
| 1388986365 | 1041713012 | -45866617.13 | 995846395.2 |
| 48128895.46 | 0 | -45866617.13 | -45866617.13 |
| 0 | 240088000.8 | -45866617.13 | 194221383.6 |
| 343215559.1 | 208694908.2 | -59875743.91 | 148819164.3 |
| 4724212553 | 4049650942 | -59875743.91 | 3989775198 |
| 1836798342 | 1857003870 | -59875743.91 | 1797128126 |
| 1191578829 | 342189150.1 | -59875743.91 | 282313406.2 |
| 3530811304 | 2168353909 | -59875743.91 | 2108478165 |
| 634201051.1 | 75965610.41 | -59875743.91 | 16089866.5 |
| 965512859 | 671243434.1 | -59875743.91 | 611367690.2 |
| 3756318545 | 2202248022 | -5987574.91 | 2142372278 |
| 689843130.9 | 84716306.23 | -59875743.91 | 24840562.32 |


| 201819ME PJM Base CA3 52 1\%LD v2C | B2026DUQ | A2026DUQ | due | 490663446.1 | -195148.68 | 490858594.8 | 205782101.4 | -59875743.91 | 145906357.4 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2026EKPC | A2026EKPC | EKPC | 388700353.4 | 16774.53 | 388683578.9 | 330520760.1 | -59875743.91 | 270645016.2 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2026FE-ATS | A2026FE-ATSI | FE-ATSI | 2410151589 | 2456900.1 | 2407694689 | 1522099969 | -59875743.91 | 1462224225 |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2026JCPL | A2026JCPL | JCPL | 791865912.7 | 144800.58 | 791721112.1 | 151438774.5 | -59875743.91 | 91562430.57 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2026METED | A2026METED | METED | 572916850.9 | -147105.61 | 573063956.5 | 442033693.1 | -59875743.91 | 382157949.2 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2026NEPTHVDC | A2026NEPTHVDC | NEPTHVDC | 208241593.3 | 0 | 208241593.3 | 0 | -59875743.91 | -59875743.91 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B20260VEC | A20260VEC | OVEC | 18875810.93 | 0 | 18875810.93 | 400974190.6 | -59875743.91 | 341098446.7 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2026PECO | A2026PECO | PECO | 1519733356 | -600367.77 | 1520333724 | 1131883090 | -59875743.91 | 1072007346 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2026PENELEC | A2026PENELEC | Penelec | 605355451.6 | -928284.96 | 606283736.6 | 1617989344 | -59875743.91 | 1558113600 |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2026PEPCO | A2026PEPCO | PEPCO | 1142659540 | 2605159.79 | 1140054380 | 251348937.9 | -59875743.91 | 191473193.9 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2026PLGRP | A2026PLGRP | PLGRP | 1479062397 | 1327500.99 | 1477734896 | 1719596542 | -59875743.91 | 1659720798 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2026PSEG | A2026PSEG | PSEG | 1537517412 | -1789827.62 | 1539307239 | 1189701289 | -59875743.91 | 1129825545 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2026RECO | A2026RECO | RECO | 54059024.5 | 84935.11 | 53974089.41 | 0 | -59875743.91 | -59875743.91 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2026zPJMMP | A2026zPJMIMP | zPJMIMP | 0 | 0 | 0 | 265290414.1 | -59875743.91 | 2054146702 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029AECO | A2029aECO | AECO | 381812635 | -274702.99 | 382087338 | 246769672.2 | -70540200.3 | 176223471.9 |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2029AEP | A2029AEP | AEP | 5371813972 | -34482469.79 | 5406296441 | 4621150847 | -70540200.3 | 4550610647 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029APS | A2029APS | APS | 2097684099 | 904606.26 | 2096779493 | 2071501041 | -70540200.3 | 2000960841 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029BGE | A2029BGE | BGE | 1343345149 | 1944132.67 | 1341401017 | 365525233.5 | -70540200.3 | 294985033.2 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029COMED | A2029COMED | COMED | 4048311277 | 5991832.68 | 4042319444 | 2396496778 | .70540200.3 | 2325956578 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029DAY | A2029day | DAY | 722599600.7 | -50660.43 | 722650261.1 | 99704617.85 | -70540200.3 | 29164417.55 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B20290EOK | A20290EOK | DEOK | 1108486228 | 4223498.16 | 1104262730 | 740774012.4 | -70540200.3 | 670233812.1 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B202900M | A2029DOM | DOM | 4330207843 | 7182427.82 | 4323025416 | 2555742141 | -70540200.3 | 2485201941 |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2029DPL | A2029DPL | DPL | 7813700039 | -19183.92 | 781389187.8 | 98399296.98 | .70540200.3 | 27859096.68 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B20290UQ | A2029duo | dua | 552167507.8 | -272857.72 | 552440365.6 | 231806796.7 | 70540200.3 | 161266596.4 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029EKPC | A2029EKPC | EKPC | 441125175.7 | 111163.2 | 441014012.5 | 373143173.1 | -70540200.3 | 302602972.8 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029FE-ATS | A2029FE-ATSI | FE-ATSI | 2726616341 | 2611444.65 | 2724004896 | 1712077450 | -70540200.3 | 1641537249 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029JCPL | A2029JCPL | JCPL | 887164040.8 | 79101.53 | 887084939.3 | 176165018.9 | -70540200.3 | 105624818.6 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029METED | A2029METED | METED | 654176240.4 | 60427.43 | 654115812.9 | 513304495.6 | . 70540200.3 | 442764295.3 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029NEPTHVDC | A2029NEPTHVDC | NEPTHVDC | 231655208.4 | 0 | 231655208.4 | 0 | -70540200.3 | .70540200.3 |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B20290VEC | A20290VEC | OVEC | 21170870.42 | 0 | 21770870.42 | 441108198.3 | -70540200.3 | 370567998 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029PECO | A2029PECO | PECO | 1724862211 | -233663.41 | 1725095874 | 1262575937 | -70540200.3 | 1192035737 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029PENELEC | A2029PENELEC | PENELEC | 676650350.1 | -1270527.12 | 677920877.3 | 1799511136 | -70540200.3 | 1728970936 |
| 201819ME PJM Base CA3 S2 1\%LD v2C | B2029PEPCO | A2029PEPCO | PEPCO | 1288624063 | 2777104.83 | 1285846958 | 291831800.4 | .70540200. 3 | 221291600.1 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029PLGRP | A2029PLGRP | PLGRP | 1668759123 | 1966203.82 | 1666792920 | 1953765977 | -70540200.3 | 1883225777 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029PSEG | A2029PSEG | PSEG | 1716024957 | -2646557.58 | 1718671514 | 1331474665 | -70540200.3 | 1260934465 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029REC0 | A2029REC0 | RECO | 60023877.82 | 98369.16 | 59925508.68 | 0 | -70540200.3 | -70540200.3 |
| 201819ME PJM Base CA3 52 1\%LD v2C | B2029zPJMIMP | A20292PJMIMP | zPJMIMP | 0 | 0 | 0 | 298207183.8 | -70540200.3 | 227666983.5 |




| 2,401, 432 |  |  | -5,132,-728 | 6,099,599 |  | 17,331,---- |  | 28,563, 454 |  | 9,489,407 |  | 7,-666,581 |  | 5,843,755 |  | $4,020,929$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | B2025 | 82026 |  | B2027 |  | 82028 |  | B2029 |  | 82030 |  | 82031 |  | 82032 |  | B2033 |  |
|  | A2025 | A2026 |  | A2027 |  | A2028 |  | A2029 |  | A2030 |  | A2031 |  | A2032 |  | A2033 |  |
|  | 2023 | 2026 |  | 2026 |  | 2026 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  |
|  | 2 | 3 |  | 3 |  | 3 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  |
|  | 0 | 3 |  | 0 |  | 0 |  | 4 |  | 0 |  | 0 |  | 0 |  | 0 |  |
|  | $\underline{2025}$ |  | $\underline{2026}$ |  | $\underline{2027}$ |  | $\underline{2028}$ |  | 2029 |  | 2030 |  | 2031 |  | $\underline{2032}$ |  | $\underline{2033}$ |
| \$ | 3,019,127 | \$ | 3,201,970 | \$ | 3,606,126 | \$ | 4,010,282 | \$ | 4,414,439 | \$ | 3,913,647 | \$ | 3,989,627 | \$ | 4,065,606 | \$ | 4,141,586 |
| \$ | $(6,663,876)$ | \$ | (7,953,305) | \$ | $(7,537,920)$ | \$ | $(7,122,535)$ | \$ | $(6,707,150)$ | \$ | $(8,065,798)$ | \$ | $(8,524,845)$ | \$ | $(8,983,891)$ | \$ | $(9,442,937)$ |
| \$ | $(4,583,426)$ | \$ | $(5,409,888)$ | \$ | $(5,239,520)$ | \$ | $(5,069,153)$ | \$ | $(4,898,785)$ | \$ | $(5,649,668)$ | \$ | $(5,953,667)$ | \$ | $(6,257,666)$ | \$ | $(6,561,665)$ |
| \$ | (8,752,890) | \$ | $(10,704,546)$ | \$ | $(10,903,271)$ | \$ | $(11,101,995)$ | \$ | (11,300,720) | \$ | $(11,974,068)$ | \$ | $(12,642,524)$ | \$ | $(13,310,980)$ | \$ | $(13,979,436)$ |
| \$ | 2,252,123 | \$ | 2,136,893 | \$ | 2,693,656 | \$ | 3,250,419 | \$ | 3,807,182 | \$ | 2,930,248 | \$ | 2,908,654 | \$ | 2,887,060 | \$ | 2,865,466 |
| \$ | $(684,571)$ | \$ | $(821,724)$ | \$ | $(764,586)$ | \$ | $(707,447)$ | \$ | $(650,309)$ | \$ | $(833,661)$ | \$ | $(888,367)$ | \$ | $(943,074)$ | \$ | $(997,781)$ |
| \$ | 1,168,587 | \$ | 1,168,686 | \$ | 1,475,396 | \$ | 1,782,105 | \$ | 2,088,815 | \$ | 1,321,111 | \$ | 1,230,214 | \$ | 1,139,318 | \$ | 1,048,421 |
| \$ | $(37,601,592)$ | \$ | $(42,075,999)$ | \$ | $(42,425,783)$ | \$ | $(42,775,567)$ | \$ | $(43,125,352)$ | \$ | $(45,080,891)$ | \$ | $(46,691,529)$ | \$ | $(48,302,166)$ | \$ | $(49,912,804)$ |
| \$ | 5,527,352 | \$ | 5,821,991 | \$ | 6,643,052 | \$ | 7,464,112 | \$ | 8,285,173 | \$ | 7,194,052 | \$ | 7,310,978 | \$ | 7,427,904 | \$ | 7,544,830 |
| \$ | 125,320 | \$ | 57,816 | \$ | 237,585 | \$ | 417,354 | \$ | 597,123 | \$ | 350,099 | \$ | 349,112 | \$ | 348,124 | \$ | 347,137 |
| \$ | $(510,466)$ | \$ | $(598,213)$ | \$ | $(577,970)$ | \$ | $(557,728)$ | \$ | $(537,485)$ | \$ | $(659,789)$ | \$ | $(704,537)$ | \$ | $(749,285)$ | \$ | $(794,032)$ |
| \$ | 2,483,350 | \$ | 2,386,762 | \$ | 3,430,702 | \$ | 4,474,642 | \$ | 5,518,583 | \$ | 4,170,829 | \$ | 4,246,407 | \$ | 4,321,985 | \$ | 4,397,563 |
| \$ | 7,982,183 | \$ | 8,430,070 | \$ | 9,431,357 | \$ | 10,432,644 | \$ | 11,433,931 | \$ | 10,393,078 | \$ | 10,643,975 | \$ | 10,894,872 | \$ | 11,145,769 |
| \$ | 6,188,779 | \$ | 6,499,558 | \$ | 7,229,400 | \$ | 7,959,242 | \$ | 8,689,083 | \$ | 8,136,515 | \$ | 8,382,124 | \$ | 8,627,734 | \$ | 8,873,343 |
| \$ | 1,475,752 | \$ | 1,464,238 | \$ | 1,740,989 | \$ | 2,017,741 | \$ | 2,294,492 | \$ | 1,900,682 | \$ | 1,911,661 | \$ | 1,922,640 | \$ | 1,933,619 |
| \$ | $(27,478)$ | \$ | $(32,331)$ | \$ | $(29,224)$ | \$ | $(26,117)$ | \$ | $(23,010)$ | \$ | $(30,141)$ | \$ | $(31,739)$ | \$ | $(33,337)$ | \$ | $(34,935)$ |
| \$ | 13,038,703 | \$ | 13,816,489 | \$ | 15,830,796 | \$ | 17,845,104 | \$ | 19,859,411 | \$ | 17,405,260 | \$ | 17,772,963 | \$ | 18,140,666 | \$ | 18,508,369 |
| \$ | 4,351,843 | \$ | 4,744,309 | \$ | 5,350,775 | \$ | 5,957,242 | \$ | 6,563,709 | \$ | 6,156,376 | \$ | 6,401,360 | \$ | 6,646,345 | \$ | 6,891,330 |
| \$ | $(14,464,503)$ | \$ | $(17,026,358)$ | \$ | $(17,707,486)$ | \$ | $(18,388,614)$ | \$ | $(19,069,742)$ | \$ | $(19,299,005)$ | \$ | $(20,178,308)$ | \$ | $(21,057,611)$ | \$ | $(21,936,914)$ |
| \$ | 15,415,018 | \$ | 16,281,104 | \$ | 18,141,565 | \$ | 20,002,026 | \$ | 21,862,487 | \$ | 20,049,523 | \$ | 20,560,372 | \$ | 21,071,220 | \$ | 21,582,069 |
| \$ | 12,329,714 | \$ | 13,112,874 | \$ | 15,066,156 | \$ | 17,019,437 | \$ | 18,972,718 | \$ | 16,668,985 | \$ | 17,055,012 | \$ | 17,441,039 | \$ | 17,827,067 |
| \$ | 332,383 | \$ | 367,277 | \$ | 407,805 | \$ | 448,333 | \$ | 488,861 | \$ | 492,023 | \$ | 519,638 | \$ | 547,252 | \$ | 574,866 |
| \$ |  | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |


|  | 2,198,103 |  | 375,277 |  | -1,447,549 |  | -3,270,375 |  | -5,093,201 |  | -6,916,027 |  | -8,738,853 |  | -10,561,679 |  | -12,384,505 |  | -14,207,330 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | B2034 |  | 82035 |  | B2036 |  | B2037 |  | B2038 |  | 82039 |  | B2040 |  | 82041 |  | 82042 |  | 82043 |
|  | A2034 |  | A2035 |  | A2036 |  | A2037 |  | A2038 |  | A2039 |  | A2040 |  | A2041 |  | A2042 |  | A2043 |
|  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |  | 2029 |
|  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |  | 4 |
|  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |  | 0 |
|  | 2034 |  | $\underline{2035}$ |  | 2036 |  | $\underline{2037}$ |  | $\underline{2038}$ |  | 2039 |  | 2040 |  | 2041 |  | $\underline{2042}$ |  | 2043 |
| \$ | 4,217,565 | \$ | 4,293,545 | \$ | 4,369,524 | \$ | 4,445,504 | \$ | 4,521,484 | \$ | 4,597,463 | \$ | 4,673,443 | \$ | 4,749,422 | \$ | 4,825,402 | \$ | 4,901,381 |
| \$ | $(9,901,984)$ | \$ | $(10,361,030)$ | \$ | $(10,820,077)$ | \$ | $(11,279,123)$ | \$ | $(11,738,169)$ | \$ | $(12,197,216)$ | \$ | $(12,656,262)$ | \$ | $(13,115,308)$ | \$ | $(13,574,355)$ | \$ | $(14,033,401)$ |
| \$ | $(6,865,665)$ | \$ | $(7,169,664)$ | \$ | $(7,473,663)$ | \$ | $(7,777,662)$ | \$ | $(8,081,662)$ | \$ | $(8,385,661)$ | \$ | $(8,689,660)$ | \$ | $(8,993,659)$ | \$ | $(9,297,659)$ | \$ | $(9,601,658)$ |
| \$ | $(14,647,892)$ | \$ | $(15,316,348)$ | \$ | $(15,984,804)$ | \$ | $(16,653,260)$ | \$ | $(17,321,716)$ | \$ | $(17,990,172)$ | \$ | $(18,658,628)$ | \$ | $(19,327,084)$ | \$ | $(19,995,540)$ | \$ | $(20,663,996)$ |
| \$ | 2,843,872 | \$ | 2,822,278 | \$ | 2,800,684 | \$ | 2,779,090 | \$ | 2,757,496 | \$ | 2,735,902 | \$ | 2,714,309 | \$ | 2,692,715 | \$ | 2,671,121 | \$ | 2,649,527 |
| \$ | $(1,052,488)$ | \$ | $(1,107,195)$ | \$ | $(1,161,902)$ | \$ | $(1,216,609)$ | \$ | $(1,271,315)$ | \$ | $(1,326,022)$ | \$ | $(1,380,729)$ | \$ | $(1,435,436)$ | \$ | $(1,490,143)$ | \$ | $(1,544,850)$ |
| \$ | 957,524 | \$ | 866,628 | \$ | 775,731 | \$ | 684,835 | \$ | 593,938 | \$ | 503,041 | \$ | 412,145 | \$ | 321,248 | \$ | 230,352 | \$ | 139,455 |
| \$ | $(51,523,442)$ | \$ | $(53,134,079)$ | \$ | $(54,744,717)$ | \$ | $(56,355,355)$ | \$ | $(57,965,992)$ | \$ | $(59,576,630)$ | \$ | $(61,187,268)$ | \$ | $(62,797,905)$ | \$ | $(64,408,543)$ | \$ | (66,019,181) |
| \$ | 7,661,756 | \$ | 7,778,682 | \$ | 7,895,609 | \$ | 8,012,535 | \$ | 8,129,461 | \$ | 8,246,387 | \$ | 8,363,313 | \$ | 8,480,239 | \$ | 8,597,165 | \$ | 8,714,091 |
| \$ | 346,150 | \$ | 345,162 | \$ | 344,175 | \$ | 343,187 | \$ | 342,200 | \$ | 341,213 | \$ | 340,225 | \$ | 339,238 | \$ | 338,250 | \$ | 337,263 |
| \$ | $(838,780)$ | \$ | $(883,528)$ | \$ | $(928,276)$ | \$ | $(973,023)$ | \$ | (1,017,771) | \$ | $(1,062,519)$ | \$ | $(1,107,267)$ | \$ | $(1,152,014)$ | \$ | $(1,196,762)$ | \$ | (1,241,510) |
| \$ | 4,473,141 | \$ | 4,548,719 | \$ | 4,624,297 | \$ | 4,699,875 | \$ | 4,775,454 | \$ | 4,851,032 | \$ | 4,926,610 | \$ | 5,002,188 | \$ | 5,077,766 | \$ | 5,153,344 |
| \$ | 11,396,666 | \$ | 11,647,563 | \$ | 11,898,460 | \$ | 12,149,357 | \$ | 12,400,254 | \$ | 12,651,152 | \$ | 12,902,049 | \$ | 13,152,946 | \$ | 13,403,843 | \$ | 13,654,740 |
| \$ | 9,118,952 | \$ | 9,364,561 | \$ | 9,610,170 | \$ | 9,855,779 | \$ | 10,101,388 | \$ | 10,346,997 | \$ | 10,592,606 | \$ | 10,838,215 | \$ | 11,083,824 | \$ | 11,329,433 |
| \$ | 1,944,598 | \$ | 1,955,577 | \$ | 1,966,556 | \$ | 1,977,535 | \$ | 1,988,514 | \$ | 1,999,493 | \$ | 2,010,472 | \$ | 2,021,451 | \$ | 2,032,430 | \$ | 2,043,409 |
| \$ | $(36,533)$ | \$ | $(38,131)$ | \$ | $(39,729)$ | \$ | $(41,327)$ | \$ | $(42,925)$ | \$ | $(44,523)$ | \$ | $(46,121)$ | \$ | $(47,719)$ | \$ | $(49,317)$ | \$ | $(50,915)$ |
| \$ | 18,876,072 | \$ | 19,243,775 | \$ | 19,611,478 | \$ | 19,979,181 | \$ | 20,346,884 | \$ | 20,714,586 | \$ | 21,082,289 | \$ | 21,449,992 | \$ | 21,817,695 | \$ | 22,185,398 |
| \$ | 7,136,315 | \$ | 7,381,299 | \$ | 7,626,284 | \$ | 7,871,269 | \$ | 8,116,254 | \$ | 8,361,239 | \$ | 8,606,223 | \$ | 8,851,208 | \$ | 9,096,193 | \$ | 9,341,178 |
| \$ | $(22,816,217)$ | \$ | $(23,695,520)$ | \$ | $(24,574,823)$ | \$ | $(25,454,126)$ | \$ | $(26,333,430)$ | \$ | $(27,212,733)$ | \$ | $(28,092,036)$ | \$ | $(28,971,339)$ | \$ | $(29,850,642)$ | \$ | $(30,729,945)$ |
| \$ | 22,092,918 | \$ | 22,603,766 | \$ | 23,114,615 | \$ | 23,625,464 | \$ | 24,136,312 | \$ | 24,647,161 | \$ | 25,158,010 | \$ | 25,668,858 | \$ | 26,179,707 | \$ | 26,690,556 |
| \$ | 18,213,094 | \$ | 18,599,121 | \$ | 18,985,149 | \$ | 19,371,176 | \$ | 19,757,203 | \$ | 20,143,231 | \$ | 20,529,258 | \$ | 20,915,285 | \$ | 21,301,313 | \$ | 21,687,340 |
| \$ | 602,481 | \$ | 630,095 | \$ | 657,710 | \$ | 685,324 | \$ | 712,938 | \$ | 740,553 | \$ | 768,167 | \$ | 795,782 | \$ | 823,396 | \$ | 851,010 |
| \$ | . | \$ | - | \$ | . | \$ | - | \$ | - | \$ | - | \$ | - | \$ | . | \$ | - | \$ |  |


|  | -16,030,156 |
| :---: | :---: |
|  | B2044 |
|  | A2044 |
|  | 2029 |
|  | 4 |
|  | 0 |
|  | 2044 |
| \$ | 4,977,361 |
| \$ | $(14,492,448)$ |
| \$ | $(9,905,657)$ |
| \$ | $(21,332,452)$ |
| \$ | 2,627,933 |
| \$ | $(1,599,556)$ |
| \$ | 48,558 |
| \$ | $(67,629,818)$ |
| \$ | 8,831,017 |
| \$ | 336,276 |
| \$ | $(1,286,257)$ |
| \$ | 5,228,922 |
| \$ | 13,905,637 |
| \$ | 11,575,042 |
| \$ | 2,054,387 |
| \$ | $(52,513)$ |
| \$ | 22,553,101 |
| \$ | 9,586,162 |
| \$ | $(31,609,248)$ |
| \$ | 27,201,404 |
| \$ | 22,073,367 |
| \$ | 878,625 |
| \$ |  |

> | PJM NPV |
| :---: |
| $-\$ 771,225,376$ |

|  |  |  |  |
| :--- | :---: | :---: | :---: |
| ZONE | NLP NPV $(\$)$ | Positive Benefit | $\%$ |
| AECO | $\$ 32,730,915$ | FALSE | $0 \%$ |
| AEP | $(\$ 68,432,741)$ | TRUE | $9 \%$ |
| APS | $(\$ 47,749,528)$ | TRUE | $6 \%$ |
| BGE | $(\$ 98,498,143)$ | TRUE | $13 \%$ |
| COMED | $\$ 24,551,677$ | FALSE | $0 \%$ |
| DAY | $(\$ 7,078,307)$ | TRUE | $1 \%$ |
| DEOK | $\$ 11,180,602$ | FALSE | $0 \%$ |
| DOM | $(\$ 383,851,403)$ | TRUE | $50 \%$ |
| DPL | $\$ 60,089,493$ | FALSE | $0 \%$ |
| DUQ | $\$ 2,620,405$ | FALSE | $0 \%$ |
| EKPC | $(\$ 5,547,548)$ | TRUE | $1 \%$ |
| FE-ATSI | $\$ 33,264,355$ | FALSE | $0 \%$ |
| JCPL | $\$ 87,0111,421$ | FALSE | $0 \%$ |
| METED | $\$ 68,147,526$ | FALSE | $0 \%$ |
| NEPTHVDC | $\$ 15,963,053$ | FALSE | $0 \%$ |
| OVEC | $(\$ 262,157)$ | TRUE | $0 \%$ |
| PECO | $\$ 144,665,334$ | FALSE | $0 \%$ |
| PENELEC | $\$ 50,675,777$ | FALSE | $0 \%$ |
| PEPCO | $(\$ 159,805,549)$ | TRUE | $21 \%$ |
| PLGRP | $\$ 167,973,753$ | FALSE | $0 \%$ |
| PSEG | $\$ 138,182,519$ | FALSE | $0 \%$ |
| RECO | $\$ 4,028,283$ | FALSE | $0 \%$ |
| ZPJMIMP | $\$ \$ 0$ | FALSE | $0 \%$ |


| 2 | 3 | 4 | $y=m^{*} x+b$ |  |
| :---: | :---: | :---: | :---: | :---: |
| 2023 | 2026 | 2029 | Slope | Intercept |
| 2,653,441.3 | 3,201,970.1 | 4,414,438.7 | 75,979.5 | -150,324,815.0 |
| -4,085,016.7 | -7,953,305.0 | -6,707,150.3 | -459,046.4 | 923,798,346.8 |
| -2,930,502.2 | -5,409,888.1 | -4,898,784.8 | -303,999.2 | 611,468,777.0 |
| -4,849,579.0 | -10,704,546.1 | -11,300,719.6 | -668,456.0 | 1,344,991,631.5 |
| 2,482,583.8 | 2,136,892.5 | 3,807,182.4 | -21,593.9 | 46,765,947.6 |
| -410,264.9 | -821,724.3 | -650,309.0 | $-54,706.9$ | 110,221,249.7 |
| 1,168,387.5 | 1,168,686.5 | 2,088,814.5 | -90,896.6 | 185,841,195.7 |
| -28,652,778.6 | -42,075,998.6 | -43,125,351.7 | -1,610,637.7 | 3,224,513,586.8 |
| 4,938,074.7 | 5,821,990.9 | 8,285,173.2 | 116,926.1 | $-230,165,940.8$ |
| 260,328.1 | 57,815.7 | 597,122.5 | -987.4 | 2,354,492.0 |
| -334,971.1 | -598,213.1 | -537,484.9 | -44,747.7 | 90,178,088.0 |
| 2,676,525.7 | 2,386,761.7 | 5,518,582.5 | 75,578.1 | -449,252,616.5 |
| 7,086,409.8 | 8,430,069.5 | 11,433,930.6 | 250,897.1 | -498,927,943.8 |
| 5,567,221.4 | 6,499,558.4 | 8,689,083.1 | 245,609.1 | -490,449,892.6 |
| 1,498,780.7 | 1,464,237.5 | 2,294,492.4 | 10,979.0 | -20,386,619.2 |
| -17,770.9 | -32,330.9 | -23,010.3 | -1,598.0 | 3,213,753.2 |
| 11,483,130.2 | 13,816,489.0 | 19,859,411.0 | 367,703.0 | -729,031,811.6 |
| 3,566,911.4 | 4,744,308.6 | 6,563,708.5 | 244,984.8 | -491,162,721.6 |
| -9,340,793.3 | -17,026,357.7 | -19,069,741.7 | -879,303.1 | 1,765,686,293.1 |
| 13,682,845.2 | 16,281,104.0 | 21,862,486.7 | 510,848.6 | -1,016,973,230.4 |
| 10,763,392.8 | 13,112,874.3 | 18,972,718.4 | 386,027.3 | $-766,966,511.7$ |
| 262,597.3 | 367,276.6 | 488,861.2 | 27,614.4 | $-55,565,216.9$ |
| 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

```
Do not modify - > Project Group
Do not modify - Base Group
```


## ISD

Project RTEP Year

| Variable | ME Tool Colum | Zone | 2019 |
| :---: | :---: | :---: | :---: |
| Adjusted Production Cost | 10 | AECO | \#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | AEP | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | APS | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | BGE | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | COMED | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | DAY | \#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | DEOK | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | DOM | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | DPL | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | DUQ | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | EKPC | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | FE-ATSI | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | JCPL | \#\#\#\#\#\#世\#\#\#\# |
| Adjusted Production Cost | 10 | METED | \#\#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | NEPTHVDC | \#\#\#1"\|\%"\#\#\#\# |
| Adjusted Production Cost | 10 | OVEC | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | PECO | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | PENELEC | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | PEPCO | \#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | PLGRP | \#\#\#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | PSEG | \#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | RECO | \#\#\#\#\#\#\#\#\#\# |
| Adjusted Production Cost | 10 | zPJMIMP | \#\#\#\#\#\#\#\#\#\#\# |


\$9,0

Adjusted Production Cost Benefits From Simulation

| PJM APC Benefit | -19,081,346 | -17,500,973 | -15,920,600 | -14,340,227 | -12,759,854 | -13,168,624 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Project Grp | B2019 | B2020 | B2021 | B2022 | B2023 | B2024 |
| BaseGrp | A2019 | A2020 | A2021 | A2022 | A2023 | A2024 |
| Intercept Year | 2019 | 2019 | 2019 | 2019 | 2023 | 2023 |
| slope/intercept | 1 | 1 | 1 | 1 | 2 | 2 |
| Model Year | 1 | 0 | 0 | 0 | 2 | 0 |
| Zone | 2019 | 2020 | $\underline{2021}$ | $\underline{2022}$ | 2023 | 2024 |



6,778,485.510
\$7,101,130.553
\#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\# $\$ 8,738,504.900$ \#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\#\# $\$ 1,285,477.230$ \#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#\#\#\#\#\#

| -13,577, 394 | -13,986, 163 | -17,066,303 | -20,146,443 | -23,226,582 | -19,224, 17 | -19,565,904 | -19,907,003 | 20,248,102 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| B2025 | B2026 | B2027 | B2028 | B2029 | B2030 | B2031 | 82032 | B2033 |
| A2025 | A2026 | A2027 | A2028 | A2029 | A2030 | A2031 | A2032 | A2033 |
| 2023 | 2026 | 2026 | 2026 | 2029 | 2029 | 2029 | 2029 | 2029 |
| 2 | 3 | 3 | 3 | 4 | 4 | 4 | 4 | 4 |
| 0 | 3 | 0 | 0 | 4 | 0 | 0 | 0 | 0 |
| $\underline{2025}$ | $\underline{2026}$ | $\underline{2027}$ | $\underline{2028}$ | 2029 | 2030 | 2031 | $\underline{2032}$ | 2033 |
| \$7,423,775.597 | \$ 7,746,420.640 | \$ 7,575,567.223 | \$ 7,404,713.807 | \$ 7,233,860.390 | \$ 6,622,960.711 | \$ 6,401,819.568 | \$ 6,180,678.424 | \$ 5,959,537.280 |
| \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(9,964,962.591) | \$(9,384,507.357) | \$(8,804,052.123) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(7,867,114.680) | \$(7,708,182.650) | \$(7,549,250.620) | \$(7,390,318.590) | \$(5,724,076.159) | \$(5,273,936.300) | \$(4,823,796.441) | \$(4,373,656.582) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,078,111.570) | \$(1,702,860.130) | \$(1,327,608.690) | \$ (952,357.250) | \$(1,037,257.009) | \$ (894,773.715) | \$ (752,290,422) | \$ (609,807.128) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(4,318,809.980) | \$(4,186,985.483) | \$(4,055,160.987) | \$(3,923,336.490) | \$(3,972,289.146) | \$(4,084,613.775) | \$(4,196,938.404) | \$(4,309,263.033) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,933,709.680) | \$(2,865,651.087) | \$(2,797,592.493) | \$(2,729,533.900) | \$(3,057,945.029) | \$(3,213,243.079) | \$(3,368,541.129) | \$(3,523,839.178) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$11,455,647.300 | \$11,944,213.433 | \$12,432,779.567 | \$12,921,345.700 | \$ 6,147,261.126 | \$ 4,483,166.592 | \$ 2,819,072.057 | \$ 1,154,977.523 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,181,510.610) | \$(2,170,066.897) | \$(2,158,623.183) | \$(2,147,179.470) | \$(1,797,217.309) | \$(1,744,061.696) | \$(1,690,906.083) | \$(1,637,750.470) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$ $2,917,595.660)$ | \$(2,807,138.937) | \$(2,696,682.213) | $\$(2,586,225.490)$ | \$ $(2,561,342.015)$ | \$ $(2,551,190.681)$ | \$ $(2,541,039.347)$ | \$(2,530,888.014) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,987,748.770) | \$(2,454,678.710) | \$(1,921,608.650) | \$(1,388,538.590) | \$(1,105,575.880) | \$ (899,147.220) | \$ $(692,718.561)$ | \$ (486,289.901) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$15,884,005.520 | \$15,478,923.853 | \$15,073,842.187 | \$14,668,760.520 | \$16,755,634.973 | \$17,714,476.914 | \$18,673,318.854 | \$19,632,160.795 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$37,940,149.730 | \$38,243,652.133 | \$38,547,154.537 | \$38,850,656.940 | \$45,468,749.152 | \$48,676,052.824 | \$51,883,356.496 | \$55,090,660.168 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,193,956.370) | \$(2,265,074.010) | \$(2,336,191.650) | \$(2,407,309.290) | \$(2,353,977.323) | \$(2,416,051.044) | \$(2,478,124.766) | \$(2,540,198.487) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,248,666.120) | \$(2,300,301.200) | \$(2,351,936.280) | \$(2,403,571.360) | \$(1,502,898.934) | \$(1,279,275.689) | \$(1,055,652.445) | \$ $(832,029.201)$ |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$44,497,804.670 | \$47,635,471.913 | \$50,773,139.157 | \$53,910,806.400 | \$46,493,455.802 | \$46,487,277.930 | \$46,481,100.057 | \$46,474,922.185 |
| \$ 660,639,830 | \$ 35,802.430 | \$ 1,108,803.593 | \$ 2,181,804.757 | \$ 3,254,805.920 | \$(3,646,082.034) | \$(5,418,925.329) | \$(7,191,768.623) | \$(8,964,611.918) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$60,585,998.460 | \$63,549,453.490 | \$66,512,908.520 | \$69,476,363.550 | \$69,374,439.674 | \$71,066,844.143 | \$72,759,248.612 | \$74,451,653.080 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$19,363,935.220 | \$19,761,998.230 | \$20,160,061.240 | \$20,558,124.250 | \$16,340,368.244 | \$15,456,037.445 | \$14,571,706.646 | \$13,687,375.846 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,193,956.370) | \$(2,265,074.010) | \$(2,336,191.650) | \$(2,407,309.290) | \$(2,353,977.323) | \$(2,416,051.044) | \$(2,478,124.766) | \$(2,540,198.487) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \$(2,179,213.520) | \$(2,329,043.407) | \$(2,478,873.293) | \$(2,628,703.180) | \$(2,422,601.099) | \$(2,475,962.251) | \$(2,529,323.403) | \$(2,582,684.554) |


| -20,589,201 | -20,930,300 | -21,271, 199 | -21,612,498 | -21,953,597 |  | -22,635,795 | -22,976,894 | 23,317,993 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| B2034 | B2035 | B2036 | B2037 | В2038 | B2039 | B2040 | B2041 | B2042 |
| A2034 | A2035 | A2036 | A2037 | 2038 | 2039 | A2040 | 2041 | 2042 |
| 2029 | 2029 | 2029 | 2029 | 2029 | 2029 | 2029 | 2029 | 2029 |
| 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2034 | $\underline{2035}$ | $\underline{2036}$ | $\underline{2037}$ | $\underline{2038}$ | $\underline{2039}$ | $\underline{2040}$ | 2041 | $\underline{2042}$ |
| \$ 5,738,396.136 | \$ 5,517,254.993 | \$ 5,296,113.849 | \$ 5,074,972.705 | \$ 4,853,831.562 | \$ 4,632,690.418 | \$ 4,411,549.274 | \$ 4,190,408.131 | \$ 3,969,266.987 |
| \$(8,223,596.889) | \$(7,643,141.655) | \$(7,062,686.421) | \$ $6,482,231.187)$ | \$(5,901,775.953) | \$(5,321,320.719) | \$(4,740,865.485) | \$(4,160,410.251) | \$(3,579,955.017) |
| \$(3,923,516.723) | \$(3,473,376.864) | \$(3,023,237.005) | \$(2,573,097.146) | \$(2,122,957.287) | \$ $(1,672,817.428)$ | \$(1,222,677.569) | \$ (772,537.710) | \$ (322,397.851) |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$ (467,323.834) | \$ (324,840.541) | \$ (182,357.247) | \$ (39,873.953) | \$ 102,609.340 | \$ 245,092.634 | \$ 387,575.928 | \$ 530,059.221 | \$ 672,542.515 |
| \$(4,421,587.661) | \$(4,533,912.290) | \$(4,646,236.919) | \$(4,758,561.548) | \$(4,870,886.177) | \$(4,983,210.806) | \$(5,095,535.435) | \$(5,207,860.063) | \$(5,320,184.692) |
| \$(3,679,137.228) | \$(3,834,435.278) | \$(3,989,733.328) | \$(4,145,031.378) | \$(4,300,329.427) | \$(4,455,627.477) | \$(4,610,925.527) | \$(4,766,223.577) | \$(4,921,521.627) |
| \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$ ( $509,117.011$ ) | \$(2,173,211.545) | \$(3,837,306.079) | \$(5,501,400.614) | \$(7,165,495.148) | \$ $(8,829,589.682)$ | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$(1,584,594.857) | \$(1,531,439.245) | \$(1,478,283.632) | \$(1,425,128.019) | \$(1,371,972.406) | \$(1,318,816.793) | \$(1,265,661.180) | \$(1,212,505.568) | \$(1,159,349.955) |
| \$(2,520,736.680) | \$(2,510,585.347) | \$(2,500,434.013) | \$(2,490,282.680) | \$(2,480,131.346) | \$(2,469,980.012) | \$(2,459,828.679) | \$(2,449,677.345) | \$ $2,439,526.012$ ) |
| \$ (279,861.242) | \$ (73,432.582) | \$ 132,996.078 | \$ 339,424.737 | \$ 545,853.397 | \$ 752,282.056 | \$ 958,710.716 | \$ 1,165,139.376 | \$ 1,371,568.035 |
| \$20,591,002.735 | \$21,549,844.676 | \$22,508,686.616 | \$23,467,528.557 | \$24,426,370.498 | \$25,385,212.438 | \$26,344,054.379 | \$27,302,896.319 | \$28,261,738.260 |
| \$58,297,963.840 | \$61,505,267.512 | \$64,712,571.184 | \$67,919,874.856 | \$71,127,178.528 | \$74,334,482.200 | \$77,541,785.872 | \$80,749,089.544 | \$83,956,393.216 |
| \$(2,602,272.208) | \$(2,664,345.930) | \$ $2,726,419.651$ ) | \$(2,788,493.372) | \$(2,850,567.094) | \$(2,912,640.815) | \$(2,974,714.537) | \$(3,036,788.258) | \$(3,098,861.979) |
| \$ (608,405.957) | \$ (384,782.713) | \$ $(161,159.469)$ | \$ 62,463.775 | \$ 286,087.020 | \$ 509,710.264 | \$ 733,333.508 | \$ 956,956.752 | \$ 1,180,579.996 |
| \$46,468,744.313 | \$46,462,566.440 | \$46,456,388.568 | \$46,450,210.696 | \$46,444,032.824 | \$46,437,854.951 | \$46,431,677.079 | \$46,425,499.207 | \$46,419,321.334 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$76,144,057.549 | \$77,836,462.018 | \$79,528,866.487 | \$81,221,270.956 | \$82,913,675.425 | \$84,606,079.894 | \$86,298,484.363 | \$87,990,888.832 | \$89,683,293.301 |
| \$12,803,045.047 | \$11,918,714.248 | \$11,034,383.449 | \$10,150,052.649 | \$ 9,265,721.850 | \$ 8,381,391.051 | \$ 7,497,060.252 | \$ 6,612,729.452 | \$ 5,728,398.653 |
| \$(2,602,272.208) | \$ $2,664,345.930$ ) | \$(2,726,419.651) | \$ $(2,788,493.372)$ | \$(2,850,567.094) | \$ $(2,912,640.815)$ | \$(2,974,714.537) | \$(3,036,788.258) | \$(3,098,861.979) |
| \$(2,636,045.706) | \$(2,689,406.858) | \$(2,742,768.009) | \$(2,796,129.161) | \$(2,849,490.313) | \$(2,902,851.464) | \$(2,956,212.616) | \$(3,009,573.768) | \$(3,062,934.919) |


| 23,659,092 | -24,000, 191 |
| :---: | :---: |
| B2043 | B2044 |
| A2043 | A2044 |
| 2029 | 2029 |
| 4 | 4 |
| 0 | 0 |
| $\underline{2043}$ | $\underline{2044}$ |
| \$ 3,748,125.843 | \$ 3,526,984.699 |
| \$(2,999,499.783) | \$(2,419,044.549) |
| \$ 127,742.008 | \$ 577,881.867 |
| \#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$ 815,025.808 | \$ 957,509.102 |
| \$(5,432,509.321) | \$(5,544,833.950) |
| \$(5,076,819.677) | \$ $(5,232,117.726)$ |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$(1,106,194.342) | \$(1,053,038.729) |
| \$(2,429,374.678) | \$(2,419,223.345) |
| \$ 1,577,996.695 | \$ 1,784,425.354 |
| \$29,220,580.200 | \$30,179,422.141 |
| \$87,163,696.888 | \$90,371,000.560 |
| \$(3,160,935.701) | \$(3,223,009.422) |
| \$ 1,404,203.240 | \$ 1,627,826.485 |
| \$46,413,143.462 | \$46,406,965.590 |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\# |
| \#\#\#\#\#\#\#\#\#\#\#\#\#\#\# | \#\#\#\#\#\#\#\#\#\#\#\#\#\# |
| \$91,375,697.769 | \$93,068,102.238 |
| \$ 4,844,067.854 | \$ 3,959,737.054 |
| \$(3,160,935.701) | \$(3,223,009.422) |
| \$(3,116,296.071) | \$(3,169,657.222) |

PJM NPV

- $\$ 157,945,981$

| ZONE | APC NPV (\$) | Positive Benefit | \% | Yr1-Yr2 Slope | Yr2-Yr3 Slope |
| :---: | :---: | :---: | :---: | :---: | :---: |
| AECO | \$60,487,082 | true | -38\% | -760209.27 | 322645.04 |
| AEP | (\$97,490,679) | TRUE | 62\% | 2788741.27 | -2396293.81 |
| APS | (\$52,355,310) | TRUE | 33\% | 1880291.86 | -877218.11 |
| BGE | (\$152,489,862) | true | 97\% | -618719.91 | -1235191.93 |
| COMED | (\$11,262,228) | true | 7\% | 209426.11 | -9970.77 |
| DAY | (\$33,450,186) | true | 21\% | 448834.44 | -894635.68 |
| DEOK | (\$25,759,852) | TRUE | 16\% | -17813.10 | -466580.93 |
| DOM | (\$1,027,760,521) | true | 651\% | 9624564.51 | -5234979.69 |
| DPL | \$59,197,881 | TRUE | -37\% | -5931589.60 | 1358571.20 |
| DUQ | (\$15,639,288) | TRUE | 10\% | 457256.44 | -351548.12 |
| EKPC | (\$22,768,215) | TRUE | 14\% | 222163.67 | -291469.74 |
| FE-ATSI | (\$11,152,800) | TRUE | 7\% | 943349.12 | 825769.78 |
| JCPL | \$140,272,427 | TRUE | -89\% | 234538.01 | 2735574.96 |
| METED | \$377,107,803 | TRUE | -239\% | 3305207.67 | 5233877.22 |
| NEPTHVDC | (\$19,950,965) | TRUE | 13\% | 108503.18 | -239162.90 |
| OVEC | (\$14,026,545) | TRUE | 9\% | 807718.81 | -204252.43 |
| PECO | \$395,136,099 | TRUE | -250\% | -6154623.96 | ${ }^{4317800.33}$ |
| PENELEC | (\$25,673,879) | TRUE | 16\% | -476957.51 | -624837.40 |
| PEPCO | (\$385,197,906) | TRUE | 244\% | 1244118.13 | -2903964.08 |
| PLGRP | \$598,546,647 | TRUE | -379\% | 1159840.71 | 1337990.03 |
| PSEG | \$146,544,869 | TRUE | -93\% | -3896658.37 | 1422580.34 |
| RECO | (\$19,950,965) | TRUE | 13\% | 108503.18 | -239162.90 |
| zPJMIMP | (\$20,309,592) | TRUE | 13\% | 187387.72 | -242132.79 |

TRENDING ANALYSIS

|  | 1 | 2 | 3 | 4 | $y=m^{*} x+b$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Yr3-Yr4 Slope | 2019 | 2023 | 2026 | 2029 | Slope | Intercept |
| -170853.42 | 9,819,323 | 6,778,486 | 7,746,421 | 7,233,860 | -221,141 | 455,539,482 |
| 1399585.03 | -19,704,507 | $-8,549,542$ | -15,738,424 | -11,539,669 | 580,455 | -1,188,869,543 |
| 158932.03 | -12,756,628 | -5,235,460 | -7,867,115 | -7,390,319 | 450,140 | -919,507,990 |
| -3644444.60 | -4,053,333 | -6,528,212 | -10,233,788 | -21,167,122 | -1,625,803 | 3,280,535,440 |
| 375251.44 | -2,616,690 | -1,778,985 | $-2,078,112$ | -952,357 | 142,483 | -290,278,343 |
| 131824.50 | -3,428,641 | -1,634,903 | -4,318,810 | -3,923,336 | -112,325 | 224,046,707 |
| 68058.59 | -1,462,715 | -1,533,967 | -2,933,710 | $-2,729,534$ | -155,298 | 312,197,096 |
| -6735646.25 | -135,156,545 | -96,658,287 | -112,363,226 | -132,570,165 | 73,987 | -268,955,372 |
| 488566.13 | 31,106,292 | 7,379,934 | 11,455,647 | 12,921,346 | -1,664,095 | 3,384,259,166 |
| 11443.71 | -2,955,892 | -1,126,866 | -2,181,511 | -2,147,179 | 53,156 | -109,703,111 |
| 110456.72 | -2,931,841 | -2,043,186 | -2,917,596 | -2,586,225 | 10,151 | -23,168,549 |
| 533070.06 | -4,283,436 | -510,439 | -2,987,749 | -1,388,539 | 206,429 | -420,155,755 |
| -405081.67 | 6,739,129 | 7,677,281 | 15,884,006 | 14,668,761 | 958,842 | -1,929,693,504 |
| 303502.40 | 9,047,687 | 22,268,518 | 37,940,150 | 38,850,657 | 3,207,304 | -6,465,357,705 |
| -71117.64 | -1,910,480 | -1,476,468 | -2,193,956 | -2,407,309 | -62,074 | 123,655,677 |
| -51635.08 | -4,866,784 | -1,635,909 | -2,248,666 | -2,403,571 | 223,623 | -455,458,085 |
| 3137667.24 | 56,162,900 | 31,544,404 | 44,497,805 | 53,910,806 | -6,178 | 59,034,537 |
| 1073001.16 | 20,990,145 | 1,910,315 | 35,802 | 3,254,806 | $-1,772,843$ | 3,595,225,806 |
| -2933290.47 | -35,324,676 | -30,348,204 | -39,060,096 | -47,859,967 | -1,320,552 | 2,634,978,637 |
| 2963455.03 | 51,935,366 | 56,574,728 | 60,585,998 | 69,476,364 | 1,692,404 | $-3,366,206,632$ |
| 398063.01 | 30,682,828 | 15,096,194 | 19,363,935 | 20,558,124 | -884,331 | 1,811,531,891 |
| -71117.64 | -1,910,480 | $-1,476,468$ | -2,193,956 | -2,407,309 | -62,074 | 123,655,677 |
| -149829.89 | $-2,202,366$ | $-1,452,815$ | -2,179,214 | -2,628,703 | -53,361 | 105,900,537 |

## BEFORE THE

## PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC for approval of the Siting and Construction of the A-2017-2640195<br>230 kV Transmission Line Associated with the Independence Energy Connection - East and West Projects in portions of York and Franklin Counties, Pennsylvania.<br>Petition of Transource Pennsylvania, LLC<br>for a finding that a building to shelter control equipment P-2018-3001878 at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public.

Petition of Transource Pennsylvania, LLC
for a finding that a building to shelter control equipment at the Furnace Run Substation in York County, Pennsylvania P-2018-3001883 is reasonably necessary for the convenience or welfare of the public.

Application of Transource Pennsylvania, LLC
for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania A-2018-3001881, for the siting and construction of the 230 kV Transmission Line et al. associated with the Independence Energy Connection East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public.

## PPL ELECTRIC UTILITIES CORPORATION

SUPPLEMENTAL TESTIMONY OF
DOUGLAS J. GROSSMAN, P.E.
IN SUPPORT OF AMENDED APPLICATION
PPL ELECTRIC STATEMENT NO. AA-1

Date: January 29, 2020
Q. Please state your name and business address.
A. My name is Douglas J. Grossman. My business address is Two North Ninth Street, Allentown, PA 18101.
Q. By whom are you employed and in what capacity?
A. I am employed by PPL Electric Utilities Corporation ("PPL Electric") as the Transmission Siting Supervisor. In that position, I am responsible for supervising siting projects that identify and select high voltage transmission line routes and substation locations. I am also responsible for supervising the preparation of Applications and Attachments for approval by the Pennsylvania Public Utility Commission ("PUC" or "Commission").
Q. What is your educational background?
A. I have a Bachelor of Science degree in Civil Engineering from Clarkson University.
Q. Do you hold any professional licenses?
A. Yes. I have been a Licensed Professional Engineer in the Commonwealth of Pennsylvania since 2001. My License Number is PE-055803E.
Q. Describe your experience and employment history with PPL Electric.
A. I have been employed by PPL Electric for approximately 10 years. I have been in my current position since January 2017. In this position I am responsible for supervising siting projects that identify and select high voltage transmission line routes and substation
locations. Prior to this position I held various titles including Siting and Permitting Supervisor, Senior Right of Way Specialist and Senior Siting Specialist.
Q. Have you participated in other transmission line siting projects for PPL Electric?
A. Yes. I have worked on more than 75 projects involving transmission lines.
Q. What are your responsibilities in connection with the proposed project to site and construct transmission lines associated with the Alternative IEC East Portion of the IEC Project (the "Project")?
A. My responsibilities are to provide overall management direction for the siting of the Project. In this capacity, I have been the lead contact between PPL Electric and Transource Pennsylvania, LLC ("Transource PA") in the joint siting process, supervised the acquisition of contract resources, public outreach, and support of right-of-way negotiations.
Q. What is the purpose of your direct testimony in this proceeding?
A. My testimony addresses several subjects. First, I will provide a digest of the testimony and exhibits filed by PPL Electric in support of the Amended Application for Approval of the Siting and Construction of Transmission Lines Associated with the Alternative IEC East Portion of the IEC Project in York County, Pennsylvania. Second, I will provide a brief overview of the Project. Third, I will describe the process employed by PPL Electric in working with Transource PA in preparing and filing the Amended Application. Fourth, I will provide an overview of the siting process used for this

Project. Fifth, I will explain PPL Electric's corporate policy on measures to mitigate the impacts of transmission lines. Finally, I will describe PPL Electric's public outreach efforts for this Project.

## I. DIGEST TO THE TESTIMONY AND EXHIBITS

Q. Please describe the relief sought in the Joint Amended Application filed by PPL Electric and Transource PA in this proceeding.
A. Through the Amended Application, PPL Electric and Transource PA seek approval from the PUC to site and construct transmission lines associated with the Alternative IEC East Portion. The Amended Application provides, among other things, an overview of the Project, an explanation of the need for the Project, a summary of the process of selecting the route for the transmission line associated with the Project and a description of the design of the transmission line.
Q. Please describe the Attachments filed with the Amended Application.
A. The Attachments to the Amended Application include the following:

- Supplemental Attachment 1: Commission Regulation Cross-Reference Matrix
- Supplemental Attachment 2: Necessity Statement
- Supplemental Attachment 3: Supplemental Siting Analysis
- Supplemental Attachment 4: Engineering Description
- Supplemental Attachment 5: List of Property Owners within the Right-of-Way
- Supplemental Attachment 6: Agency Requirements
- Supplemental Attachment 7: List of Governmental Agencies, Municipalities, and Other
- Supplemental Attachment 8: List of Governmental Agencies, Municipalities, and Other Public Entities Contacted
- Supplemental Attachment 9: List of Public Locations where the Amended Application can be Viewed by the Public
- Supplemental Attachment 10: Design Criteria and Safety
- Supplemental Attachment 11: Vegetation Management
- Supplemental Attachment 12: Agency Coordination
- Supplemental Attachment 13: Public Notice Requirements
Q. Are you responsible for the oversight and preparation of any of the attachments or exhibits filed with the Amended Application?
A. Yes. 1 am responsible for coordinating with Transource PA and the preparation PPL Electric's portion of the Amended Application and supporting attachments. In addition, I am directly responsible for overseeing the preparation of the following portions of the Amended Application:

Supplemental Attachment 1 PUC Regulation Cross-Reference Matrix
Supplemental Attachment 7 List of Governmental Agencies, Municipalities and Other Public Entities Receiving the Amended Application

Supplemental Attachment 8 List of Government Agencies, Municipalities and Other Public Entities Contacted

Supplemental Attachment 9 List of Public Locations where Amended Application can be Viewed

## Q. Please describe the testimony submitted with the Amended Application.

A. PPL Electric and Transource PA are submitting a total of eight statements, including this one, in support of the Amended Application. These Statements provide additional explanation of the matters addressed in the Amended Application and identify the witness who is sponsoring each portion of the Amended Application. PPL Electric's statements are identified below.

> PPL Electric St. No. AA-1: Douglas J. Grossman, Transmission Siting Supervisor for PPL Electric - Provides an overview of the Project; describes the process employed by PPL Electric in developing, preparing and filing this Amended Application; provides an overview of the siting process used for this Project; explains the decision making process within PPL Electric for selecting the transmission line route; explains PPL Electric's corporate policy on measures to mitigate the impact of a transmission line; and describes the public outreach program employed by PPL Electric for this Project.

PPL Electric St. No. AA-2: Matt Baranoski, Support Engineer for PPL Electric Addresses the cost of the Project and the proposed Project schedule.

PPL Electric St. No. AA-3: Kyle Swarzentruber, Senior Engineer for PPL Electric - Explains the major design features of the Project; describes the safety features incorporated into the design of the proposal; explains PPL Electric's Magnetic Field Management Program and how it has been incorporated into the design of the Project; and describes PPL Electric's existing system and how this Project will be added to existing facilities.

PPL Electric St. No. AA-4: Austin Weseloh, Transmission Right-of-Way and Real Estate Supervisor for PPL Electric - Describes PPL Electric's policies regarding dealings with owners of land over which PPL Electric needs to construct electric utility facilities; summarizes the existing right-of-way for the proposed Project; and identifies additional or expanded rights-of-way needed.

PPL Electric St. No. AA-5: Barry Baker - Mr. Baker is Associate Vice-President and Department Manager for the Natural Resources Department at AECOM and Technical Lead in the AECOM U.S. Transmission \& Distribution and Impact Assessment \& Permitting practices. Mr. Baker conducted the initial siting analysis for the IEC Project and will provide information regarding the siting analysis for the Alternative East Portion of the IEC Project.

## II. SUMMARY OF THE PROJECT

Q. Please summarize the Project.
A. The proposed Project involves siting and constructing transmission lines associated with the Alternative IEC East project that was agreed to in various settlement in this proceeding.

PPL's total estimated cost for PPL's portion of the Project is approximately $\$ 37.84$ million. ${ }^{1}$ Construction is scheduled as soon as practical following Commission approval. The engineering and design of the Project are further explained in Supplemental Attachment 4 to the Amended Application and PPL Electric Statement No. AA-3.
Q. Please describe the major tasks PPL Electric must undertake to construct this Project.
A. PPL Electric must: 1) obtain PUC approval, and applicable state, county, and local permits; 2) complete engineering; 3) procure materials; and 4) install erosion and sedimentation controls.
Q. Please summarize the principal permits and approvals required for this project.

[^14]A. Supplemental Attachment 6 lists the local, state and federal agency requirements for permits, approvals or documentation. Specific permits and approvals will be obtained once engineering is complete and appropriate permits are identified.

## III. PREPARATION OF THE AMENDED APPLICATION

Q. Please describe the process employed by PPL Electric in preparing the Amended Application.
A. The Amended Application, in its broadest sense, is designed to show that the Alternative IEC East Portion route, as agreed to by the Settling Parties, is in the public interest and should be approved by the PUC. The need for the Alternative IEC East Portion is explained in Supplemental Attachment 2 to the Amended Application and Transource PA Statement No. AA-1. The PPL Electric siting process and environmental assessment and mitigation are described Supplemental Attachment 3 to the Amended Application and PPL Electric Statement No. AA-5.

The process to prepare this Amended Application was a joint effort between PPL Electric and Transource PA. The Amended Application is consistent with requirements put forth in the Settlement Agreements between Transource PA and PPL Electric, York County Planning Commission, and Citizens to Stop Transource York County, Maple Lawn Farms, Barron Shaw and Shaw Orchards (the latter four collectively, "York County Citizens")

PPL Electric has maintained close involvement in all aspects of this Project throughout the period prior to the filing of this Amended Application, and it will continue to do so through engineering, construction, and Project commissioning. Where outside
assistance is used, one or more PPL Electric employees are assigned for oversight and decision making purposes.

## IV. OVERVIEW OF THE SITING PROCESS

## Q. Please summarize PPL Electric's experience and expertise in planning and constructing high voltage transmission line projects.

A. PPL Electric's experience and expertise in planning and constructing high voltage transmission line projects goes back many decades. During the 1920s, PPL Electric was one of three utilities that formed the PA-NJ interconnection by linking 230 kV transmission systems together and establishing an economic generation dispatch protocol among the companies. In the 1960 s, the Company entered a joint venture with partner utilities that were members of the PJM power pool to construct mine-mouth generation units in western Pennsylvania and transmit that generation to Maryland, Delaware and eastern Pennsylvania and New Jersey through more than 600 miles of 500 kV transmission lines. In the early 1980s, PPL Electric reinforced its backbone transmission system by establishing over 100 miles of new 500 kV transmission facilities and three new 500 kV Substations and significantly upgrading three existing 500 kV Substations. Today, PPL Electric owns and maintains approximately 447 miles of 500 kV and 1292 miles of 230 kV high voltage transmission line.

PPL Electric has extensive experience and, through the combination of internal and contract resources, the expertise to plan, design, and construct high voltage transmission line projects. The Company maintains a staff of planning and design engineers for high voltage transmission projects and, from time to time, supplements that
staff with contract resources. PPL Electric has in-house construction resources capable of building high voltage projects. For very large projects, such as the project proposed here, PPL Electric uses a combination of internal PPL Electric resources as well as contract resources to build facilities in an efficient and timely manner.

## Q. What was your role on the siting team?

A. My principal responsibility was to oversee the Siting Team in pursuing the Alternative IEC East project including providing oversight for the public outreach undertaken on this project and provide assistance to the Real Estate Team.

## VI. MEASURES TO MITIGATE THE IMPACTS OF TRANSMISSION LINES

Q, Please explain how PPL Electric will oversee the siting and construction of transmission lines associated with the Alternative IEC East project, if approved by the Commission.
A. We plan to assemble a team of experts in design and construction of overhead transmission lines. The Project's success will be defined in terms of compliance to schedule, economy in cost, and adherence to quality. Construction sequences will be established to assure assets can be placed in service as soon as possible. Outages will be coordinated, planned, and scheduled to maintain system integrity during the construction phase. PPL Electric understands the impact of construction activity on the local community and significant efforts will be made to keep local area residents and their representatives aware of Project activities.

## Q. Please explain PPL Electric's corporate policy on measures to mitigate the impacts of transmission lines.

A. PPL Electric strives to minimize the impacts of transmission lines upon property owners and the environment. Mitigation efforts actually begin in the siting stage where sensitive areas are avoided to the extent practical. When avoidance is not practical, PPL Electric will implement mitigation strategies as explained in more detail below.
Q. Please describe PPL Electric's vegetation management program.
A. PPL Electric's vegetation management program is outlined in the "Specifications for Transmission Vegetation Management LA-79827." A copy of this vegetation management program is provided as Supplemental Attachment 12 to the Amended Application. In summary, for the initial clearing of the expanded right-of-way, PPL Electric initially removes all vegetation except for grasses and herbaceous or non-woody plants within the right-of-way. After the initial clearing of the right-of-way, compatible species are then allowed to grow back through selective application of herbicides. PPL Electric then maintains the right-of-way by selectively removing only non-compatible species. Selective clearing allows compatible species of vegetation that would not grow tall enough to threaten the reliable operation of the transmission line to remain within the right-of-way.

Additionally, PPL Electric does not use any aerial herbicide application techniques. Herbicides are applied at ground level by trained professionals. Only those species that require control are treated. PPL Electric will not apply herbicides in the following areas or situations: pastures within 50 feet of any body of water, except that

PPL Electric will use herbicides approved for watershed/aquatic use for stump treatments; within any actively maintained orchard or cultivated planting; near susceptible crops or other non-target vegetation where drift, runoff, or vapors can cause injury; where weather conditions create excessive drift; on rights-of-way under jurisdiction of the Pennsylvania Department of Conservation and Natural Resources, Pennsylvania Game Commission, Pennsylvania Fish and Boat Commission, and the National Park Service unless prior approval is granted by the Department or Commission; on watershed properties, or in the vicinity of springs, irrigation ditches, or other potable water sources, unless prior approval is granted by the property owner for use of a watershed/aquatic approved herbicide; or in gullies or ravines where tree clearing is minimal. Finally, all herbicides used by PPL Electric have been approved by the United States Environmental Protection Agency.
Q. Will these same vegetation management practices be applied to the siting and construction of transmission lines associated with the Alternative IEC East Portion?
A. Yes. The project includes a combination of existing right-of-way and right-of-way that was expanded to meet project requirements. In areas where vegetation management is required to complete the project, PPL Electric will apply its "Specifications for Transmission Vegetation Management LA-79827" to mitigate any impacts.

[^15]Impacts from soil erosion and sedimentation and crossings of jurisdictional waters and wetlands are mitigated through the acquisition of and compliance with all required permits and plans. Initially, all wetlands and waters are identified, delineated, surveyed and added to construction plans. Structure and access road locations are located outside these sensitive areas as much as practical. In locations where avoidance is not practical, all required permits are obtained, and PPL Electric adheres to their terms and conditions during construction.

The placement of conditions on a permit by the U.S. Army Corps of Engineers, the Department of Environmental Protection or similar agencies is a principal tool for protecting the environment. The placement of conditions on a permit indicates that the agency has thoroughly reviewed the permit application and that, so long as conditions are followed, there will be no harm to the environment that is unlawful under the applicable statutes.

## Q. What is PPL Electric's policy regarding electric and magnetic fields?

A. PPL Electric has instituted a Magnetic Field Management Program for new and rebuilt transmission lines. The implementation of this policy with respect to the proposed siting and construction of transmission lines associated with the Alternative IEC East Portion is discussed in PPL Electric Statement No. AA-3.

## Q. Does PPL Electric consider impacts on individual property owners?

A. Yes. PPL Electric works with property owners to locate the line to minimize the impact on their existing and future land use plans wherever practical. For the portion of the

5 Q. Does this conclude your testimony at this time? residential structures. during the course of this proceeding. project that utilized expanded right-of-way, PPL Electric shifted the proposed centerline, where practical, to increase the distance from the centerline and edge of right-of-way to
A. Yes, it does. I reserve the right to supplement my testimony as additional issues arise

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC for approval of the Siting and Construction of the A-2017-2640195<br>230 kV Transmission Line Associated with the A-2017-2640200 Independence Energy Connection - East and West Projects in portions of York and Franklin Counties, Pennsylvania.<br>Petition of Transource Pennsylvania, LLC<br>for a finding that a building to shelter control equipment P-2018-3001878 at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public.<br>Petition of Transource Pennsylvania, LLC<br>for a finding that a building to shelter control equipment at the Furnace Run Substation in York County, Pennsylvania P-2018-3001883 is reasonably necessary for the convenience or welfare of the public.<br>Application of Transource Pennsylvania, LLC<br>for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Line A-2018-3001881, associated with the Independence Energy Connection East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public. et al.

# PPL ELECTRIC UTILITIES CORPORATION 

SUPPLEMENTAL TESTIMONY OF
MATTHEW BARANOSKI
IN SUPPORT OF AMENDED APPLICATION
PPL ELECTRIC STATEMENT NO. AA-2

Date: January 29, 2020

## Q. Please state your name and business address.

A. My name is Matthew Baranoski. My business address is Two North Ninth Street, Allentown, PA 18101.
Q. By whom are you employed and in what capacity?
A. I am employed by PPL Electric Utilities Corporation ("PPL Electric") as a Support Engineer. In that position, I am responsible for general oversight and project management during the project development phase. The project development phase is responsible for completing sufficient preliminary engineering and planning activities to finalize technical scope to reduce risk on transmission projects.
Q. What is your educational background?
A. I have a Bachelor of Science degree in Electrical Engineering from The Pennsylvania State University and a Master of Business Administration from Temple University.
Q. Do you hold any professional licenses?
A. I hold an Engineer in Training (EIT) certification in the state of Pennsylvania which was obtained in 2017.
Q. Describe your experience and employment history with PPL Electric.
A. I have been employed by PPL Electric for approximately 3 years. I have been in my current position since May of 2019. In this position I am responsible for general
oversight and project management for the preliminary engineering and planning activities on transmission projects.
Q. Have you participated in other transmission line siting projects for PPL Electric?
A. Yes. I have worked on more than 5 projects involving transmission lines of which involved siting activities.
Q. What are your responsibilities in connection with the proposed siting and construction of transmission lines associated with the Alternative IEC East Portion of the IEC Project (the "Project")?
A. My responsibilities are to oversee the preliminary engineering and project planning activities for the siting and construction of transmission lines associated with the Alternative IEC East Portion.
Q. What is the purpose of your direct testimony in this proceeding?
A. My testimony addresses cost of the proposed Project.
Q. Are you responsible for the oversight and preparation of any of the attachments or exhibits filed with the Amended Application?
A. I am not responsible for any of the attachments or exhibits filed with the Amended Application.

## I. SUMMARY OF THE PROJECT

Q. Please summarize the Project.
A. The proposed Project involves the siting and construction of transmission lines associated with the Alternative IEC East Portion.

The total estimated cost to PPL Electric of this Project is approximately $\$ 37.84$ million. ${ }^{1}$
Q. Please give a breakdown of the total estimated cost to PPL Electric of the proposed plan to site and construct transmission lines associated with the Alternative IEC East Portion.
A.

| Project Section | Description | Total Estimated Costs |  |
| :---: | :---: | :---: | :---: |
| Furnace Run - Conastone | Add 2nd Circuit | \$ | 6,927,989 |
| Furnace Run - Conastone | New D/C | \$ | 5,683,243 |
| Furnace Run - Otter Creek | New S/C | \$ | 4,132,557 |
| Furnace Run - Manor | New S/C | \$ | 5,653,949 |
| Furnace Run - Graceton 1 \& 2 | New D/C | \$ | 7,836,770 |
| Furnace Run - Graceton 1 \& 2 | Add 2nd Circuit | \$ | 6,191,176 |
| Row Acquisition | Expand ROW | \$ | 1,410,360 |
| Total |  | \$ | 37,836,044 |

1 Q. Does this conclude your testimony at this time?
A. Yes, it does. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

[^16]Application of Transource Pennsylvania, LLC<br>for approval of the Siting and Construction of the A-2017-2640195<br>230 kV Transmission Line Associated with the A-2017-2640200<br>Independence Energy Connection - East and West Projects in portions of York and Franklin Counties, Pennsylvania.<br>Petition of Transource Pennsylvania, LLC<br>for a finding that a building to shelter control equipment P-2018-3001878 at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public.<br>Petition of Transource Pennsylvania, LLC for a finding that a building to shelter control equipment at the Furnace Run Substation in York County, Pennsylvania P-2018-3001883 is reasonably necessary for the convenience or welfare of the public.<br>Application of Transource Pennsylvania, LLC<br>for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Line A-2018-3001881, associated with the Independence Energy Connection East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public.

# PPL ELECTRIC UTILITIES CORPORATION 

 SUPPLEMENTAL TESTIMONY OFKYLE SWARTZENTRUBER
IN SUPPORT OF AMENDED APPLICATION
PPL ELECTRIC STATEMENT NO. AA-3

Date: January 29, 2020

## Q. Please state your name and business address.

# A. My name is Kyle Swartzentruber, and my business address is Two North Ninth Street, Allentown, Pennsylvania 18101. 

## Q. By whom are you employed and in what capacity?

A. I am employed by PPL Electric Utilities Corporation ("PPL Electric") as a Senior Engineer. In this position, I engineer and oversee the construction of high voltage electrical lines ranging from $69 \mathrm{kV}-500 \mathrm{kV}$. Our group is also responsible for any item of concern on the Transmission system ranging from significant operating events to property owner and customer requests. I have been employed by PPL Electric since May of 2011.
Q. Please provide a summary of your education and professional work experience.
A. I attended The Pennsylvania State University where I received a BS in Mechanical Engineering Technology graduating in May of 2008. After graduating college, I began work as a Reliability Test Engineer for Mack Trucks Inc. from 2008-2010 when the facility was closed.

From the spring of 2010 to the fall of 2010 , I worked as a design engineer and drafter for East Penn Manufacturing performing machine design and drafting to facilitate manufacturing of large stationary batteries.

From the Fall of 2010 to the spring of 2011, I worked for Ingersoll Rand designing Air Drying system for industrial manufacturing applications. I have been employed by PPL Electric since May of 2011.
Q. What are your responsibilities in connection with the proposal to site and construct transmission lines associated with the Alternative IEC East Portion of the IEC Project?
A. In my role as a Senior Engineer, I am responsible for the transmission design and engineering portion of the proposal to site and construct transmission lines associated with the Alternative IEC East Portion of the IEC Project (the "Project").

## Q. What is the purpose of your direct testimony in this proceeding?

A. My testimony addresses several issues. First, I will explain the major design features of the proposal to site and construct transmission lines associated with the Alternative IEC East Portion. Second, I will explain the safety features incorporated into the design of the proposal to site and construct transmission lines associated with the Alternative IEC East project. Third, I will explain PPL Electric's Magnetic Field Management Program and how it has been incorporated into the design of the proposal to site and construct transmission lines associated with the Alternative IEC East Portion. Finally, I will explain PPL Electric's existing system and how this project will be added to existing facilities.
Q. Please describe the portions of the Amended Application that you are sponsoring.
A. I am sponsoring Supplemental Attachment 4, the Engineering Description, and Supplemental Attachment 10, PPL Electric's Design and Safety Practices, which includes the Company's Magnetic Field Management Program.
Q. Please provide an overview of the proposed project to site and construct transmission lines associated with the Alternative IEC East Portion.
A. The proposed Project involves rerouting the existing Manor-Graceton 230 kV line from both Manor and Graceton to terminate in Transource PA's Furnace Run Substation, creating a Furnace Run-Manor 230 kV line and a Furnace Run - Graceton \#1 230kV line. In addition, PPL Electric will construct a new Furnace Run - Graceton \#2 230 kV circuit in Pennsylvania by: (1) constructing a new 230 kV line from Transource PA's Furnace Run station to the intersection of the current PPL Electric Manor-Graceton 230kV line; (2) adding a new line, consisting of new arms, conductors and necessary hardware, to the open positons on the existing towers on the current Manor -Graceton 230 kV line from the Manor - Graceton 230 kV intersection point south to the state line; and (3) using conductors for the new Furnace Run-Manor, Furnace Run - Graceton \#1 and Furnace Run - Graceton \#2 230 kV lines that are similar to those used by PPL Electric when it rebuilt the Conastone-Otter Creek and Graceton Manor 230 kV lines. PPL Electric will reroute the Conastone-Otter Creek 230 kV line from both Otter Creek and Conastone to terminate in Transource PA's Furnace Run Substation, creating a Furnace Run-Otter Creek 230 kV line and a Furnace - Run Conastone \#1 230kV circuit. Lastly, PPL Electric will construct a new Furnace Run-Conastone \#2 230 kV line in Pennsylvania by: (1) constructing a new 230 kV line from Transource PA's Furnace Run station to the intersection of the current Otter Creek - Conastone 230 kV line; (2) adding a new line, consisting of new arms, conductors and necessary hardware, to the open positons on the existing towers on the current Otter Creek - Conastone 230 kV line from the Otter Creek - Conastone 230 kV intersection point south to the Conastone Substation; and (3) using
conductors for the new Furnace Run - Otter creek, Furnace Run-Conastone \#1 and Furnace Run - Conastone \#2 230kV lines that are similar to those used by PPL Electric when it rebuilt the Conastone-Otter Creek and Graceton-Manor 230 kV lines. Transource PA will modify the initial Furnace Run station configuration to accommodate the addition of a third $500 / 230 \mathrm{kV}$ transformer and terminate the six 230 kV lines in the station.
Q. Please describe the engineering configuration of the existing facilities.
A. The existing PPL facilities, the Manor-Graceton line and the Otter Creek-Conastone line, are both single circuit 230 kV steel monopole lines that were designed and constructed for future double circuit.
Q. Please describe the process used to determine whether PPL Electric's existing facilities could accommodate the Alternative IEC East Portion.
A. Engineering evaluated the capacity of the existing structures and determined that an additional circuit can be added as the structures were designed with the capacity of a future second circuit.
Q. Please describe the design voltage for the existing lines.
A. The existing lines being re-routed into the Furnace Run Substation are presently operated and designed for 230 kV .
Q. Please describe the conductors to be used for the Furnace Run-Graceton \#1, Furnace Run-Graceton \#2, Otter Creek,-Furnace Run Furnace Run-Conastone \#1, and Furnace Run-Conastone \#2 230 kV lines?
A. Based on preliminary engineering the conductors will be Lapwing 1590 ASCR 45/7 stranding, or they will provide a minimum ampacity of the above-mentioned conductor.
Q. Will the proposed rerouting of the Manor-Graceton 230 kV line and proposed rerouting of the Conastone-Otter Creek 230 kV line include overhead ground wires?
A. Yes. The proposed Project will include the installation of 0.752 diameter OPGW acting as overhead shield wire.
Q. Please describe the principal types of structures that will be used for the proposed siting and construction of transmission lines associated with the Alternative IEC East Portion.
A. Diagrams of structures similar to the ones that will be installed for this proposed Project are included in Supplemental Attachment 4 to the Amended Application.
Q. For the portion of the Project that will require new structures, will the new structures be placed in a pole-for-pole configuration with the existing structures?
A. No. There are existing 69 kV structures however the new circuits to the Furnace Run Substation will not follow a pole for pole configuration. The new facilities to Furnace Run will be a single and a double circuit 230 kV line. The existing 69 kV line are a double
circuit line. However, the new structures will generally follow the existing transmission line corridor.

## Q. Please explain the safety features incorporated into the design of the proposed siting and construction of transmission lines associated with the Alternative IEC East Portion.

A. The proposed Project will be designed and built to meet or exceed all applicable National Electrical Safety Code ("NESC") minimum standards. The NESC is a set of guidelines to safeguard people during the installation, operation, and maintenance of electric power lines. The NESC contains the basic provisions considered necessary for the safety of employees and the public.

In addition to the safety features incorporated by designing the line in accordance with the NESC; PPL Electric has additional more stringent design standards. PPL Electric's design loading conditions for structures, wires, and clearances exceed NESC standards. Relay protection systems are also employed to automatically de-energize the line in the unlikely event of a failure on the line in which the line contacts the ground or a grounded object. The line is also designed for conductor-to-conductor clearances and conductor-to-ground clearances which support live-line maintenance and inspections. Work procedures and tooling have been developed to allow work to be performed in a safe manner on energized facilities. Personnel are furnished with appropriate Personal Protective Equipment for the performance of construction or maintenance activities in a safe manner.
Q. Please explain PPL Electric's Magnetic Field Management Program and how it will be incorporated into the design of the proposed siting and construction of transmission lines associated with the Alternative IEC East project.
A. Before describing PPL Electric's Magnetic Field Management Program, I note that, in conjunction with seeking Commission approval for the siting and construction of the Susquehanna-Roseland 500 kV Transmission Line, Docket Number A-2009-2082652, PPL Electric presented extensive independent expert testimony on Electric and Magnetic Field ("EMF") issues. Based on this extensive evidence, the Commission adopted the Administrative Law Judge's finding that there is no reliable scientific basis to conclude that exposure to EMFs from electric power lines causes or contributes to adverse health effects in people. See Application of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the Pennsylvania Portion of The Proposed Susquehanna-Roseland 500-kV Transmission Line in Portions of Lackawanna, Luzerne, Monroe, Pike and Wayne Counties, Pennsylvania, Docket Number A-2009-2082652, 2010 Pa. PUC LEXIS 434 at *167-80 (February 12, 2010), affirmed sub nom., Environmental Conservation Council v. Public Utility Commission, 25 A.3d 440 (Pa. Cmwlth. 2011).

Notwithstanding the foregoing, PPL Electric has adopted a program to mitigate the potential impacts from EMFs. PPL Electric's Magnetic Field Management Program was first developed in the early 1990s to implement a policy decision to design new and rebuilt transmission lines to reduce magnetic fields when that can be done at no or low additional cost and is consistent with meeting the functional requirements of the line. A
copy of the current PPL Electric's Magnetic Field Management Program is found as Attachment 10 to the Siting Application.

PPL Electric's Magnetic Field Management Program is applied to new and reconstructed transmission line projects. In order to lower magnetic field exposures, the program generally prescribes the use of a line design that provides ground clearances of five feet higher than the required minimum NESC ground clearance and reverses phasing of new double circuit lines where it is feasible to do so at low or no cost. The implementation of additional modifications will be considered, provided those modifications can be made at low or no cost and will not interfere with the operation of the line.

Consistent with its Magnetic Field Management Program, PPL Electric will design the new transmission lines for ground clearances that are a minimum of 25.5 feet.

## Q. Does this complete your direct testimony?

A. Yes, it does. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC<br>for approval of the Siting and Construction of the A-2017-2640195<br>230 kV Transmission Line Associated with the A-2017-2640200<br>Independence Energy Connection - East and West Projects in portions of York and Franklin Counties, Pennsylvania.<br>Petition of Transource Pennsylvania, LLC<br>for a finding that a building to shelter control equipment P-2018-3001878<br>at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public.<br>Petition of Transource Pennsylvania, LLC<br>for a finding that a building to shelter control equipment at the Furnace Run Substation in York County, Pennsylvania P-2018-3001883<br>is reasonably necessary for the convenience or welfare of the public.<br>Application of Transource Pennsylvania, LLC<br>for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Line A-2018-3001881, associated with the Independence Energy Connection East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public.

# PPL ELECTRIC UTILITIES CORPORATION 

 SUPPLEMENTAL TESTIMONY OFAUSTIN K. WESELOH
IN SUPPORT OF AMENDED APPLICATION
PPL ELECTRIC STATEMENT NO. AA-4

Date: January 29, 2020

## I. INTRODUCTION

Q. Please state your name and business address.
A. My name is Austin K. Weseloh. My business address is Two North Ninth Street, Allentown, PA 18101.
Q. By whom are you employed and in what capacity?
A. I am employed by PPL Electric Utilities Corporation ("PPL Electric") as the Transmission Right of Way and Real Estate Supervisor. In this position, my primary responsibility is to supervise all Transmission Right of Way and Real Estate assets for PPL Electric.
Q. What is your educational background?
A. I attended 3 years at University of Pittsburgh majoring in Economics, and I am working to complete the remaining required classes to attain my Bachelors of Art.
Q. Are you a member of any professional organizations?
A. Yes. I am currently a member of the International Right of Way Association ("IRWA") where I am taking classes to attain the Senior Right of Way Agent ("SRWA") certification. This is the highest designation of Senior Right of Way Professional ("SR/WA"). The certification requires course work consisting of both core courses and elective courses. The certification requires satisfactory completion of the certification test administered by the IRWA.
Q. Please summarize your employment history.
A. I have been employed by PPL Electric in my current position as Transmission Right of Way and Real Estate Supervisor for approximately 2 years. Prior to that, I was a Senior Right of Way Specialist at PPL Electric for three and a half years.

- From 2012 through 2013, I worked as a Right-of-Way Agent for Doyle Land Services negotiating the acquisition of right-of-way grants, access roads, property damages and real estate contracts to add a 60 mile pipe adjacent to an existing right-of-way in Pennsylvania.
- From 2011 through 2012, I worked as a Right-of-Way Agent for Meridian Land Group negotiating the acquisition of right-of-way grants, access roads and property damages for 75 miles of new pipeline right-of-way to connect 69 new natural gas wells in North East Pennsylvania.
- From 2010 through 2011, I worked as a Right-of-Way Agent for Miller Land Professionals reviewing title for potential natural gas leases and rights-of-way in Bradford and Susquehanna Counties, Pennsylvania.
- From 2004 through 2010, I worked for LTS Builders and Realty Company purchasing land for new home construction. My duties included negotiating for individual lots as well as large tracts to be subdivided into developments.
Q. What are your responsibilities in connection with the proposed project to site and construct the transmission lines associated with the Alternative IEC East Portion of the IEC Project (the "Project")?
A. My colleagues and I are responsible to work with the affected landowners and negotiate to obtain the easements which PPL Electric is seeking to acquire to build the Alternative

IEC East project. The project team reviews and identifies any areas where PPL Electric will require new or widened rights-of-way for the Project.

In the areas where PPL Electric needs to acquire additional or expanded transmission line rights-of-way, we attempt to negotiate with the landowners to acquire the needed land rights through voluntary transactions. We also deliver to all property owners affected by the Project, literature including, but not limited to, an electromagnetic field ("EMF") brochure, compatible right-of-way uses, existing right-of-way documentation, pictures of typical transmission line structures, and other information to help them fully understand the project.

## Q. Do you meet with property owners?

A. Yes. The Right-of-Way Agents meet with property owners to answer questions, address concerns, and/or resolve issues. The Right-of-Way Agent provides the property owners with information on how they can contact PPL Electric at any time, answer questions or address any issues or concerns. The Right-of-Way Agent is a direct link for the property owner to communicate with PPL Electric.
Q. What is the purpose of your direct testimony in this proceeding?
A. First, I will identify the portions of the Amended Application that I am sponsoring. Second, I will describe PPL Electric's policies regarding dealings with owners of land over which PPL Electric needs to construct electric utility facilities. Third, I will summarize the existing right-of-way for the proposal to site and construct the
transmission lines associated with the Alternative IEC East Portion and identify the additional or expanded rights-of-way needed for the Project.
Q. Please describe the portions of the Amended Application that you are sponsoring.
A. I am responsible for Supplemental Attachment 5, which provides a list of property owners that will be traversed by the proposed Project. I also am responsible for Supplemental Attachment 13, which provides the packets of information that PPL Electric delivered to property owners that are or will be along the right-of-way and easement for the siting and construction of the transmission lines associated with the Alternative IEC East Portion.

## II. PPL ELECTRIC POLICIES REGARDING OWNERS OF LAND

Q. Please explain PPL Electric's policy regarding dealings with owners of land over which PPL Electric needs to construct electric utility facilities.
A. PPL Electric has adopted Internal Practices for Dealing with the Public on Power Line Projects, which is included in Supplemental Attachment 13 to the Amended Application. PPL Corporation has a long-standing commitment to conducting business in an honest and ethical manner. Consistent with the expectations laid out in the PPL Standards of Conduct PPL Electric's employees, contractors and agents who interact with members of the public in activities such as negotiating real estate transactions, access roads, crop damages among other things, to act with honesty and integrity while treating people courteously and in a professional manner at all times.
Q. Did PPL Electric provide information to property owners that PPL Electric needed acquire additional rights-of-way?
A. Yes. During the initial contact with landowners regarding transmission line projects, PPL Electric provides packets of information to fully notify landowners that PPL Electric plans to negotiate to acquire rights-of-way and easements across their land. This packet of information discloses information to the owner concerning the name of the proposed project and the voltage at which the line will operate and informs them of their legal rights and PPL Electric's legal rights with regard to the project.

This information includes the two notices which are required by the Pennsylvania Public Utility Commission ("Commission") in its regulations at 52 Pa . Code § 57.91. The first notice references PPL Electric's power of eminent domain, that is, the power to condemn land rights to construct facilities necessary for providing electric utility services to the public. The second notice provides information related to the right-of-way maintenance practices for the subject transmission lines. We also provide information that pertains to electric and magnetic fields, a glossary of commonly used real estate terms and a listing of the trees and shrubs that are considered a permitted use within the easement area by PPL Electric.

The information and notices provided for the siting and construction of the transmission lines associated with the Alternative IEC East project are included in Supplemental Attachment 13 to the Amended Application.
Q. What does PPL Electric do after providing the information and notices to landowners?
A. Pursuant to 52 Pa . Code $\S 57.91$ (a), PPL Electric waits at least fifteen days after the landowner receives the notices provided in Supplemental Attachment 13 to the Amended Application before discussing compensation for the rights-of-way. We then contact the property owner(s) via telephone or in person to schedule a convenient time to meet so that we may explain the details of the Project and answer any questions the property owner(s) may have. For any new, additional, or expanded rights-of-way or easements we usually make a monetary offer to the property owner(s) at the meeting. The amount of the offer is based on the fair market value of the interests in the real estate which PPL Electric wishes to acquire.
Q. When negotiating with landowners, how do you determine the value of the land rights which PPL Electric proposes to acquire?
A. When determining fair compensation to the property owner for the rights which PPL Electric proposes to acquire, we follow a process. First, PPL Electric hires an outside appraiser to conduct a market study of recent, nearby comparable land sales and current listings. This information is used as a basis for determining the value of land on a per acre basis in the transmission line project area. These comparable values are reviewed and analyzed with special attention given to the acreage amounts, type of land, zoning classification, and other price determining factors such as topography, views, on-site utilities, etc. The current use and potential future use of the parcel along with the location
of the proposed easement area on the property are also important factors in determining the amount of monetary compensation for the right-of-way.

## III. DESCRIPTION OF RIGHT-OF-WAY

## Q. Please describe the right-of-way for the existing facilities.

A. The existing right-of-way for the project extends approximately 4 miles between the Manor -Graceton and the Otter Creek - Conastone 230 kV transmission lines. The existing right-of-way traverses York County through the municipalities listed in Supplemental Attachment 8. The existing right-of-way varies in width from undefined centerline rights to a 300 foot corridor owned by PPL Electric in fee simple. In some areas, PPL Electric also has tree clearing/tree trimming rights in place to prevent encroachments and minimize the potential impacts of danger trees.
Q. Will the proposed project to site and construct the transmission lines associated with the Alternative IEC East Portion require expansion of the existing right-of-way?
A. Not with respect to the Manor - Graceton and Otter Creek - Conastone lines to install the second circuit. However, PPL Electric was required to acquire additional easement rights to define the Furnace Run 230 kV right-of-way to 225 feet in width. I note that no condemnation applications are necessary for the Alternative IEC East Portion because PPL Electric was able to acquire all necessary rights from landowners for the Furnace Run segments of the Alternative IEC East Portion prior to the submission of the Amended Application.
Q. Does PPL Electric have sufficient rights to site and construct the transmission lines associated with the Alternative IEC East Portion?
A. Yes, PPL Electric has all the required right of way on both the Manor - Graceton and Otter Creek - Conastone lines to install the second circuit and has purchased the necessary easements for the Furnace Run line.
Q. Please explain PPL Electric's policy regarding the land owner's use of the right-ofway area.
A. PPL Electric has established encroachment guidelines that define permitted and nonpermitted uses within its existing transmission line rights-of-way. In the most general terms, no building, structure, or explosive material may occupy PPL Electric's rights-ofway. There are, however, numerous compatible uses of these rights-of-way that do not interfere with the safe and reliable operation and maintenance of our facilities. Uses such as farming and gardening, or other passive uses, require no review or approvals by PPL Electric. Development of properties which includes extensive grading and installation of parking, utilities, roadways and other infrastructure, requires review and approval by PPL Electric. These development changes are usually compatible, provided the design and work performed in the area does not interfere with the safe and reliable operation and maintenance of our facilities.

## Q. Does this complete your direct testimony?

1 A. Yes, it does. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC for approval of the Siting and Construction of the 230 kV Transmission Line Associated with the Independence Energy Connection - East and West Projects in portions of York and Franklin Counties, Pennsylvania.<br>Petition of Transource Pennsylvania, LLC<br>for a finding that a building to shelter control equipment<br>P-2018-3001878<br>at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public.<br>Petition of Transource Pennsylvania, LLC<br>for a finding that a building to shelter control equipment at the Furnace Run Substation in York County, Pennsylvania P-2018-3001883<br>is reasonably necessary for the convenience or welfare of the public.<br>Application of Transource Pennsylvania, LLC for approval to acquire a certain portion of the lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 kV Transmission Line associated with the Independence Energy Connection East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public.<br>A-2017-2640195<br>A-2017-2640200<br>-2018-3001883<br>A-2018-3001881, et al.

# PPL ELECTRIC UTILITIES CORPORATION SUPPLEMENTAL TESTIMONY OF BARRY A. BAKER <br> IN SUPPORT OF AMENDED APPLICATION <br> PPL ELECTRIC STATEMENT NO. AA-5 

Date: January 29, 2020

## I. INTRODUCTION

Q. Please state your name and business address.
A. My name is Barry Alan Baker. My business address is 625 West Ridge Pike, Suite E100, Conshohocken, PA 19428
Q. By whom are you employed and in what capacity?
A. I am employed by AECOM Corporation as a Vice-President and Department Manager for the Pennsylvania Impact Assessment \& Permitting (IAP) Department and also serve as the AECOM co-Regional Practice lead in the Northeast U.S.
Q. What are your principal responsibilities in these positions?
A. In these roles I am a Certified Project Manager and manage projects for siting and permitting of new transmission lines, power plants, and other facilities. I manage Departments of approximately two hundred (200) individuals responsible for environmental, cultural resources, and information technology services. Additionally, I serve as a technical lead for transmission and distribution services on the east coast of the U.S.
Q. Please provide a summary of your education and professional work experience.
A. I received a Bachelor of Science with Honors degree in Environmental Science from the University of East Anglia in Norwich, England in 1996. A key focus was on the use of GIS and computer applications for environmental problem solving. My additional continuing education relevant to my current position includes the following courses and programs:

- Approximately 50 Project Management Classes necessary for formal certification.
- Creating and Integrating Data for Natural Resource Applications (ESRI).
- Geoprocessing with ArcGIS Desktop (ESRI).
- Spatial Hydrology Using ArcView (ESRI).
- Introduction to ArcIMS (ESRI).
- System Architecture Design for GIS (ESRI).

I have been employed by AECOM for the last fourteen years in the roles previously discussed. In these positions I have been responsible for siting studies both as a Project Manager and as a technical lead for transmission line siting as well as new power development throughout the Northeast and mid-Atlantic regions of the U.S., including: PA, NJ, MD, NY, CT, OH, IL, VA, DE, and MA. I also manage the Pennsylvania Impact Assessment \& Permitting Department where I am responsible for a team of biologists, ecologists, and GIS specialists. Prior to joining AECOM, I held GIS and environmental development positions for other environmental and government consultants.

## Q. Have you previously testified in public utility commission proceedings?

A. Yes, I have provided siting testimony before the Pennsylvania Public Utility Commission (Commission or PAPUC) for PPL Electric Utilities Corporation (PPL Electric) and FirstEnergy Service Company, as well as for Transource PA, LLC (Transource PA) specifically for the portions of the Independence Energy Connection Project (IEC Project) located in Pennsylvania. I also testified before the Maryland Public Service Commission (MDPSC) for Transource MD, LLC specifically for the portions of the IEC Project in Maryland. Additionally, I have provided siting testimony before the New Jersey Board of Public Utilities.

## Q. What is the purpose of your direct testimony in this proceeding?

A. My testimony provides a summary of the Supplemental Siting Study and explains the selection of the Alternative IEC East Portion as the Proposed Route for the IEC East Project, which is described below.
Q. Were any portions of the siting application prepared by you or under your supervision?
A. Yes. I am sponsoring certain attachments to the Amended Application. Specifically, I am responsible for portions of the following attachments to the Siting Application:

- Supplemental Attachment 1 PAPUC Cross-Reference
- Supplemental Attachment 3 Supplemental Siting Study
- Supplemental Attachment 5 Landowner Addresses
- Supplemental Attachment 6 Permit Matrix
- Supplemental Attachment 7 Entities Receiving Application
- Supplemental Attachment 8 Government Agencies Contacted
- Supplemental Attachment 9 Public Locations
- Supplemental Attachment 12 Agency Coordination

I was integrally involved in preparing these attachments to the Siting Application and provided oversight to AECOM technical staff that also were involved with their
preparation. I also provided review for the complete Siting Application prior to assembly and submission to the Commission.
Q. What are your responsibilities in connection with the Supplemental Siting Study?
A. PPL Electric retained AECOM to prepare a Supplemental Siting Study that comparatively evaluated the original Transource PA IEC East Proposed Route with the Alternative IEC East Route. I led the team that conducted the Supplemental Siting Study for this Project and was integrally involved in preparing various attachments to the Application, most notably Attachment 3 - Supplemental Siting Study. In this capacity, I reviewed and provided oversight on all items prepared, coordinated and managed all team members, technical experts and writers, and helped assemble the document submitted to the Commission.

## Q. Please describe the purpose of the Supplemental Siting Study.

A. The purpose of the Supplemental Siting Study is to compare the original IEC East Proposed Route with the Alternative IEC East Route. The comparison allows for the assessment of potential impacts to the human/built environment, natural environment, and engineering variables associated with constructing the two Alternative Routes. Following this comparison and evaluation, a Proposed Route can be identified for construction that meets the need for the IEC East Project while minimizing potential impacts to the surrounding environments. A complete copy of the Supplemental Siting Study, along with supporting materials and maps, is provided as Attachment 3 to the Siting Application.
Q. Was the same methodology and analysis used for the Supplemental Siting Study as that described in the original Transource IEC East Project application and siting study?
A. Yes.
Q. Was public outreach conducted during this process?
A. Yes. PPL Electric and Transource PA held a public open house meeting on January 14, 2020 in the project area. The meeting was held to inform the general public and relevant landowners of the current project status; address any questions and concerns the public may have; and discuss the timing and construction activities to be conducted for the development of the Alternative IEC East Route, with specific focus on the Furnace Run 230 kV Transmission Line section. Landowners within 500 feet of the Alternative IEC East Route alignment were mailed invitation letters to the open house and advertisements for the event were also placed in local newspapers.

## II. PROPOSED ROUTE

Q. How does the Alternative IEC East Portion compare to the originally proposed route for the IEC East Project?
A. The Alternative IEC East Portion will utilize existing infrastructure and/or rights-of-way, affect fewer new landowners and parcels, and impact fewer natural resources than the route originally proposed for the IEC East Project.

The entire alignment for the Alternative IEC East Portion consists of parcels that currently have ROW agreements in place or are owned in fee by PPL Electric, and it uses
existing infrastructure for majority of the length of the line. Furthermore, the addition of a second circuit onto the existing PPL Electric transmission lines that compose the majority of the Alternative IEC East Portion have been previously approved by the PAPUC.

The 4-mile Furnace Run 230 kV Transmission Line corridor portion of the Alternative IEC East Portion is the only section that will require widening of existing ROWs. Some of the parcels crossed are owned in fee by PPL Electric that will not require any ROW widening. The Furnace Run 230 kV Transmission Line section contains fewer landowners and parcel crossings relative to the original IEC East Proposed Route. Effectively, the Alternative IEC East Portion will minimize requirements for new ROW acquisition and potential impacts to new property owners.

Environmentally, only four streams are present along the Furnace Run 230 kV Transmission Line corridor that will require clearing of the riparian areas compared to the eleven streams located along the original IEC East Proposed Route. In terms of wetlands, the Furnace Run 230 kV Transmission Line corridor would potentially cross 0.7 acre of forested wetland that would require clearing, which is similar to the forested wetland area ( 0.7 acre) that would be crossed by the IEC East Proposed Route. Forest clearing for the Alternative IEC East Portion will only occur along the Furnace Run 230 kV Transmission Line corridor portion. This option will involve less tree clearing (19.3 acres) relative to the IEC East Proposed Route (51.7 acres), which reduces the forest fragmentation effects and potential impacts to threatened and endangered (T\&E) species that use forest habitats such as T\&E bat species. As such, the Alternative IEC East

Portion will result in less overall environmental impacts relative to the original IEC East Proposed Route.

From an engineering perspective, the Alternative IEC East Portion already spans Muddy Creek in defined ROW areas and will minimize the construction challenges associated with steep slopes in these areas as only new arms and wires will be added to the existing towers. The Alternative IEC East Portion was also selected as the Proposed Route because access to the existing PPL Electric transmission lines was previously identified and coordinated with landowners when these lines were rebuilt in 2012-2014. Coordination for access to the Furnace Run 230 kV Transmission Line section will be considerably less challenging than the coordination that will be required for defining and obtaining permission for the numerous new access roads that would be necessary for the IEC East Proposed Route.

Overall the Alternative IEC East Portion is anticipated to have less total impact when compared to the original Proposed Route for the IEC East Project.

[^17]As part of the permitting process, any required waterway, wetland, or floodplain encroachment permits will be obtained from the applicable jurisdictional state and federal agencies prior to construction and PPL Electric will comply with all special conditions placed on the permits. In addition, to address water quality standards within watersheds along the IEC East Project corridor, PPL Electric will comply with the regulations of the National Pollutant Discharge and Elimination System permit program, obtain the required soil erosion and sedimentation control permits, and follows the specified conditions required for the permit.

PPL Electric has initiated the T\&E species review process though the Pennsylvania Natural Diversity Inventory (PNDI) on-line system to determine if any state or federally listed species of concern may be located in the Furnace Run 230 kV Transmission Line project area. The PNDI receipt noted that there is a potential for a U.S. Fish and Wildlife Service (USFWS) listed species to be present. Coordination with USFWS will be conducted to determine if any surveys or avoidance measures are required for the project. No other potential species impacts were identified, and no additional coordination is required from Pennsylvania state agencies.

Additional discussion of PPL Electric's efforts to minimize the anticipated impacts and potential permit and mitigation requirements of the proposed IEC East Project is provided in Section 4.2 of Attachment 3 (Supplemental Siting Study) to the Amended Application. This section addresses potential impacts to land use, natural features, threatened and endangered species; cultural resources, and community features and conserved lands, as well as addresses anticipated agency requirements and permits and reviews consistency with county comprehensive plans and municipal zoning.

2 Q. Does this conclude your testimony at this time?
3 A. Yes. I reserve the right to supplement my testimony as additional issues arise during the course of this proceeding.


[^0]:    1 On December 27, 2017, Transource also filed an Application before the Maryland Public Service Commission ("MD PSC") requesting approval for the portion of the IEC Project located in portions of Harford and Washington Counties, Maryland. The Application was docketed at Case No. 947 I.
    ${ }^{2}$ The Alternative IEC East Portion is more fully described in Appendix A to the settlement agreements that were filed with Commission on October 17, 2019. The IEC Project is a major component of the broader project identified by PJM as "Project 9A." Project 9A also includes upgrades at existing transmission facilities in Pennsylvania and Maryland, which are the responsibility of other incumbent entities. The upgrades to existing facilities, while not part of the IEC Project, are inter-dependent components of the solution approved by PJM, and are described in more detail in the testimony of Mr. Ali (Transource PA Statement No. 2), submitted with Transource PA's December 27, 2017 Siting Application.

[^1]:    ${ }^{3}$ In the Maryland proceeding, Transource executed settlement agreements with BGE, PPRP, the Maryland Public Service Commission Technical Staff, and Harford County. These settlement agreements were filed with the MD PSC on October 17, 2018.

[^2]:    ' Includes $2 \%$ contingency.
    ${ }^{2}$ Includes approximately $\$ 3 \mathrm{M}$ contingency.
    ${ }^{3}$ Includes $10 \%$ contingency.

[^3]:    ${ }^{1}$ The Alternative IEC East Portion is more fully described in Appendix A to the settlement agreements that were filed with Commission on October 17, 2019. The IEC Project is a major component of the broader project identified

[^4]:    by PJM as "Project 9A." Project 9A also includes upgrades at existing transmission facilities in Pennsylvania and Maryland, which are the responsibility of other incumbent entities. The upgrades to existing facilities, while not part of the IEC Project, are inter-dependent components of the solution approved by PJM.

[^5]:    1 The market efficiency base case was updated in July 2019 and further revised in September 2019.
    ${ }^{2}$ For further discussion, see the section of this paper regarding Project 5 E , below.

[^6]:    ${ }^{3}$ https://www.pim.com/-/media/committees-groups/committees/teac/20181108/20181108-transource-white-paper.ashx
    ${ }^{4} \mathrm{PJM}$ is not a party to that proceeding, though PJM has run analysis, offered testimony and sponsored data requests in the matter.

[^7]:    ${ }^{5}$ The market efficiency base case was updated in July 2019 and further revised in September 2019.
    ${ }^{6}$ PJM has performed a constructability analysis of the western portion of Alternative Project 9 A and used a cost for Alternative Project 9A's eastern segment that reflects a 25 percent sensitivity to the PPL and BGE elements (elements that have not been reviewed for constructability). Costs for the alternative configuration of the eastern portion would have to increase by a significant margin in order for the benefit-to-cost ratio for Alternative Project 9A to fall below the 1.25 threshold. At this stage of the CPCN proceedings and based on the significant margin that exists in the benefit-to-cost ratio, it is unnecessary to commission a partial constructability analysis of the alternative configuration of the eastern portion of Alternative Project 9 A .

[^8]:    ${ }^{7}$ The market efficiency base case was updated in July 2019 and further revised in September 2019.
    ${ }^{8}$ For further discussion, see the section of this paper regarding Project 5 E , below.

[^9]:    ${ }^{9}$ SmartValve, a Smart Wires Inc. product, acts as a variable impedance device that can vary the impedance on the line the device is installed on.

[^10]:    ${ }^{10}$ The market efficiency base case was updated in July 2019 and further revised in September 2019.

[^11]:    ${ }^{1}$ The Alternative IEC East Portion is more fully described in Appendix A to the settlement agreements that were filed with Commission on October 17, 2019. The IEC Project is a major component of the broader project identified by PJM as "Project 9A." Project 9A also includes upgrades at existing transmission facilitics in Pennsylvania and Maryland, which are the responsibility of other incumbent entities. The upgrades to existing facilities, while not part of the IEC Project, are inter-dependent components of the solution approved by PJM.

[^12]:    ${ }^{2}$ See also TPA Ex. TJH-AA-3.

[^13]:    * Costs based on PJM's Independent Cost/Constructability Review
    ** Cost split based on September 20 IPSAC Presentation
    https://www.pjm.com/-/media/committees-groups/stakeholder-meetings/ipsac/20190920/20190920-ipsac-presentation.ashx

[^14]:    ' The estimated cost for the proposed Project is an order-of-magnitude estimate developed using averages of recent costs for similar projects and without an in-depth analysis of field investigation. The estimated cost is subject to change as the constructability of the project, sequence of construction, and other factors that may affect cost are identified and analyzed as the project progresses.

[^15]:    Q. What is PPL Electric's approach to mitigation of impacts on bodies of water and wetlands?

[^16]:    ${ }^{1}$ The estimated cost for the proposed Project is an order-of-magnitude estimate developed using averages of recent costs for similar projects and without an in-depth analysis of field investigation. The estimated cost is subject to change as the constructability of the project, sequence of construction, and other factors that may affect cost are identified and analyzed as the project progresses.

[^17]:    III. COMPLIANCE WITH POTENTIAL PERMIT AND MITIGATION REQUIREMENTS
    Q. Please summarize PPL Electric's efforts to minimize the anticipated impacts and potential permit and mitigation requirements of the Proposed Route for the IECEast Project.
    A. Efforts were made during this process to minimize impacts on existing and future land uses, as well as avoid sensitive natural resources such as wetlands and streams. Where potential impacts are unavoidable, best management practices will be employed and PPL Electric will obtain and comply with any necessary permits.

