

PJM Interconnection, L.L.C. 2750 Monroe Boulevard Audubon, PA 19403

Steven R. Pincus Managing Counsel T: (610) 666-4370- | F: (610) 666-8211 steven.pincus@pim.com

March 26, 2024

The Honorable Debbie-Anne A. Reese, Acting Secretary Federal Energy Regulatory Commission 888 First Street, N.E., Room 1A Washington, DC 20426-0001

Re: PJM Interconnection, L.L.C., Docket No. ER24-1621 -000 (CTOA)

Revisions to Consolidated Transmission Owners Agreement For FirstEnergy Service

Company Transmission Owners

Dear Secretary Reese:

Pursuant to Section 205 of the Federal Power Act,<sup>1</sup> PJM Interconnection, L.L.C. ("PJM") submits for filing to the Federal Energy Regulatory Commission ("Commission") revisions to the Consolidated Transmission Owners Agreement ("CTOA").<sup>2</sup> FirstEnergy, on behalf of its PJM transmission-owning affiliates, requested that PJM amend the CTOA signature blocks for Keystone Appalachian Transmission Company ("KATCo") and Monongahela Power Company ("Mon Power") and The Potomac Edison Company ("Potomac Edison"), doing business as Allegheny Power (collectively, the "FirstEnergy Transmission Owners") to reflect the January 1, 2024 signature dates for their respective CTOA signature blocks which are included in the tariff records already accepted by the Commission in this proceeding.<sup>3</sup>

<sup>1</sup> 16 U.S.C. § 824d (2018).

<sup>2</sup> Unless other defined herein, capitalized terms are defined in the PJM Tariff. The division between PJM and the FirstEnergy Service Company ("FirstEnergy") transmission-owning affiliates of filing responsibilities herein are consistent with filing rights allocated to PJM and the PJM Transmission Owners pursuant to Section 9 of the PJM Tariff and Article 7 of the CTOA.

<sup>&</sup>lt;sup>3</sup> PJM Interconnection, L.L.C., Letter Order, Docket Nos. ER24-284-000 and ER24-285-000 (Dec. 18, 2023) ("Letter Order").

PJM respectfully requests that the Commission accept the enclosed revisions with an effective date of May 26, 2024.

# I. BACKGROUND

On November 1, 2023, FirstEnergy Pennsylvania Electric Company ("FE PA"), and KATCo filed modifications to the PJM Open Access Transmission Tariff ("Tariff"), Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. ("Operating Agreement"), Reliability Assurance Agreement Among Load Serving Entities in the PJM Region ("RAA"), and the CTOA (together, the "PJM Governing Agreements") in connection with the integration of FE PA and KATCo into PJM as a result of FirstEnergy's proposed internal corporate reorganization (the "Transaction") ("November 1 Filing").<sup>4</sup>

At the time of the November 1 Filing, FE PA and KATCo anticipated that the Transaction would close on January 1, 2024, but the exact date was not certain. Thus, PJM requested an openended effective date of 12/31/9998 for the PJM Governing Agreements revisions attached to the November 1 Filing. In the November 1 Filing, PJM submitted for filing, as part of the PJM CTOA revisions, a signature page to the PJM CTOA executed by KATCo. In addition, PJM filed to revise the PJM CTOA removing West Penn from the Allegheny Power signature block because West Penn Power was replaced by FE PA. Because the effective date of the Transaction was not yet known at the time of the November 1 Filing, the dates for the signature blocks for the FirstEnergy Transmission Owners were left blank.

In the Letter Order, the Commission accepted the November 1 Filing effective 12/31/9998, as requested, subject to PJM submitting a compliance filing to notify the Commission of the actual

<sup>&</sup>lt;sup>4</sup> The Transaction was approved by the Commission in Docket No. EC23-59-000. *See FirstEnergy Corp.*, et al., 184 FERC  $\P$  61,094 (2023).

effective date of the tariff records within 30 days of the effective date of the tariff records (*i.e.*, within 30 days of the FE PA and KATCo Transaction closing date).

On January 29, 2024, PJM filed a supplemental filing ("Supplemental Filing") to comply with the Commission's Letter Order. The Supplemental Filing provided the Commission with the effective date of January 1, 2024, the date of the consummation of the Transaction and effective date of the revisions already accepted by the Commission.

# II. DESCRIPTION OF PROPOSED REVISIONS

On January 5, 2024, FirstEnergy submitted a filing to notify the Commission that the Transaction was consummated on January 1, 2024.<sup>5</sup> Therefore, PJM hereby submits for filing revised signature blocks dates adding January 1, 2024 as the execution dates for the FirstEnergy Transmission Owners.

# IV. PROPOSED EFFECTIVE DATE

PJM respectively requests that the Commission accept the enclosed revisions to the PJM Tariff and CTOA, effective May 26, 2024.

## V. DESCRIPTION OF SUBMITTAL

Along with this transmittal letter, PJM submits the following attachments:

- 1. Attachment A: Revised CTOA, signature blocks (*Marked CTOA*); and
- 2. Attachment B: Revised CTOA, signature blocks (*Clean CTOA*).

<sup>&</sup>lt;sup>5</sup> See Notice of Consummation, Docket No. EC23-59-000.

# III. CORRESPONDENCE AND COMMUNICATIONS

PJM requests that communications concerning the instant filing be directed to the persons listed below (with electronic service) and that the listed persons be included on the Commission's service list for this proceeding:

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

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

## IV. SERVICE

PJM served a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM Region by posting this filing electronically. In compliance with the Commission's regulations, PJM will (i) post a copy of this filing to the Commission filings section of PJM's website, located at the following link: <a href="https://www.pjm.com/library.aspx">https://www.pjm.com/library.aspx</a> (with a specific link to the newly-filed document); and (ii) send an email on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region alerting them that this filing has been made by PJM and is available by following the above-referenced link. If the document is not immediately accessible by using the link set forth above, the document will be available through the referenced link within twenty-four hours of the filing. Furthermore, a copy

<sup>&</sup>lt;sup>6</sup> See 18 C.F.R. §§ 35.2(e) and 385.2010(f)(3).

<sup>&</sup>lt;sup>7</sup> PJM already maintains, updates, and regularly uses email lists for all PJM Members and affected state commissions.

The Honorable Debbie-Anne A. Reese, Acting Secretary March 26, 2024 Page 5

of this filing will be available on FERC's eLibrary website at <a href="https://www.pjm.com/library.aspx">https://www.pjm.com/library.aspx</a> in accordance with the Commission's regulations and Order No. 714.

Respectfully submitted,

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

Counsel for PJM Interconnection, L.L.C.

cc:

Anna Rericha arericha@firstenergycorp.com

Nicholas Giannasca@dwt.com

Jonathan A. Namazi JonathanNamazi@dwt.com

# Attachment A

Revisions to the PJM Consolidated Transmission Owners Agreement

(Marked / Redline Format)

#### ATTACHMENT A

## TO THE CONSOLIDATED

#### TRANSMISSION OWNERS AGREEMENT

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

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

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

Dayton Power and Light Company

Virginia Electric and Power Company (Dominion Virginia Power)

Public Service Electric and Gas Company

PECO Energy Company

PPL Electric Utilities Corporation

Baltimore Gas and Electric Company

Jersey Central Power & Light Company

Potomac Electric Power Company

Atlantic City Electric Company

Delmarva Power & Light Company

UGI Utilities. Inc.

Allegheny Electric Cooperative, Inc.

Essential Power Rock Springs, LLC

Old Dominion Electric Cooperative

Rockland Electric Company

**Duquesne Light Company** 

Neptune Regional Transmission System, LLC

Trans-Allegheny Interstate Line Company

Linden VFT, LLC

American Transmission Systems, Incorporated

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

Duke Energy Ohio, Inc.

Duke Energy Kentucky, Inc.

City of Hamilton, OH

Hudson Transmission Partners, LLC

East Kentucky Power Cooperative, Inc.

Mid-Atlantic Interstate Transmission, LLC

Southern Maryland Electric Cooperative, Inc.

Ohio Valley Electric Cooperative

AMP Transmission, LLC

Transource West Virginia, LLC

Silver Run Electric, LLC

NextEra Energy Transmission MidAtlantic Indiana, Inc.

Wabash Valley Power Association, Inc.

Keystone Appalachian Transmission Company

PJM I	nterconnection, L.L.C.
By:	
•	Phillip G. Harris
Title:	President and CEO
Date:	December 15, 2005

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

By: \_\_\_\_\_\_Name: Olenger L. Pannell Title: Vice President

Date: January 1, [month] [day] [2024X]

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

By:\_\_\_\_\_ Name: Lisa M. Barton

Title: Executive Vice President - AEP Transmission

Date: October 13, 2015

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

By	:				

Name: Susan Ivey

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

Date: December 15, 2005

The D	ayton Power and Light Company
By:	
Name:	Patricia K. Swanke
Title:	Vice President - Operations
Date:	December 15, 2005

Virginia Electric and Power Company (Dominion Virginia Power)
By:
Name: Gary L. Sypolt
Title: President – Dominion Transmission
Date: December 15, 2005

Public Service Electric and Gas Company
By:
Name: Ralph LaRossa
Title: Vice President - Electric Delivery
Date: December 15, 2005

Exelo	n Corporation on behalf of its subsidiary
PECC	Energy Company
Bv:	
	: Susan Ivey
Title:	Vice President, Transmission Operations and Planning, Exelon Corporation
Date:	December 15, 2005

PPL Electric Utilities Corporation
By:
Name: John F. Sipics
Title: President
Date: December 15, 2005

Baltimore Gas and Electric Company
By:
Name: Mark P. Huston
Title: Vice President, Electric Transmission and Distribution
Date: December 15, 2005

Jersey	Central Power & Light Company
By:	
Name	: Stanley F. Szwed
Title:	Vice President – Energy Delivery Policy
	First Energy Service Company
Date:	December 15, 2005

Poton	nac Electric Power Company
By:	
	: David M. Valazquez
Title:	Vice President, Pepco Holdings, Inc
Date:	December 15, 2005

Atlant	ic City Electric Company
By:	
Name	: David M. Valazquez
Title:	Vice President, Pepco Holdings, Inc.
Date:	December 15, 2005

Delmarva Power & Light Company
By:
Name: David M. Valazquez
Title: Vice President, Pepco Holdings, Inc.
Date: December 15, 2005

UGI Utilities, Inc.
By:
Name: Richard E. Gill
Title: Assistant Secretary - Electric Transmission
Date: December 15, 2005

Essential Power Rock Springs, LLC
By:
Name: Jason Solimini
Title: Vice President Finance, Controller and Treasure
Date: September 26, 2019

Old Dominion Electric Cooperative	
By:	
Name:	
Title:	
Date: December 15, 2005	

Rockland Electric Company	
By:	
Name:	
Title:	
Date: December 15, 2005	

Duquesne Light Company	
Ву:	
Name:	
Title:	
Date: December 15, 2005	

Allegheny Electric Cooperative, Inc.
By:
Name: Richard W. Osborne
Fitle: Vice President Power Supply & Engineering
Date: December 15, 2005

Neptune Regional Transmission System, LLC
By:
Name: Edward M. Stern
Title: CEO
Date: March 7, 2007

Trans-Allegheny Interstate Line Company				
By:				
Name:	James R. Haney			
Title:	Vice President			
Date:	November 8, 2007			

Linden	VFT, LLC
By:	
-	Andrew J. Keleman
Title:	Authorized Representative
Date:	April 1, 2009

American Transmission Systems, Incorporated

By:				

Name: Richard R. Grigg

Title: President

Date: December 17, 2009

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

Title: Director

Date: March 22, 2011

Duke 1	Energy Ohio, Inc.	
By: _		
Name:	Julia S. Janson	
Title:	President	
Date:	September 27, 2011	

Duke Energy Kentucky, Inc.		
Ву: _		
Name:	Julia S. Janson	
Title:	President	
Date:	September 27, 2011	

City of Hamilton, OH	
By:	
Name:	Joshua A. Smith
Title:	City Manager
Date:	February 29, 2012

Hudson Transmission Partners, L.L.C.	
By:	
Name: Jeffrey T. Wood	
Title: Senior Vice President	
Date: February 8, 2013	

East Kentucky Power Cooperative, Inc.	
Ву:	
Name:	Anthony S. Campbell
Title:	President & CEO
Date:	March 26, 2013

Mid-Atlantic Interstate Transmission, LLC	
By:	

Name: Richard A. Ziegler

Title: Director, FERC & RTO Technical Support

Date: October 14, 2016

Southern Maryland Electric Cooperative, Inc.	
By:	
Name: Austin J. Slater, Jr.	
Title: Descident & CEO	

Title: President & CEO Date: October 19, 2016

Ohio '	Valley Electric Corporation, Inc.
By:	
Name:	: Justin J. Cooper
Title:	Secretary, Treasurer, and Chief Financial Officer
Date:	November 28 2018

AMP Transmission, LLC	
By:	
Name: Pamala M. Sullivan	
Title: President	
Date: October 9, 2018	

Transource West Virginia, LLC	
By:	
Name: Antonio P. Smyth	
Title: President	
Date: February 19, 2019	

Silver Run Electric, LLC
By:
Name: Paul G. Thessen
Title: President
Date: February 27, 2020

NextEra Energy Transmission MidAtlantic Indiana, Inc
By:
Name: Michael Sheehan
Title: Vice President
Date: May 7, 2020

Wabash Valley Power Association, Inc.
Ву:
Name: Jay Bartlett
Title: Chief Executive Officer
Date: 10/25/19

Keystone Appalachian Transmission Company

By: _	
Name:	Olenger L. Pannell
Title:	Vice President

Date: January 1 [month] [day], 2024X

## Attachment B

Revisions to the PJM Consolidated Transmission Owners Agreement

(Clean Format)

## ATTACHMENT A

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Date:	December 15, 2005

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Name: Olenger L. Pannell Title: Vice President Date: January 1, 2024

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Title:	
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Name:				
Title:				
Date: Do	ecember 1	5, 2005		

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Title:	
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Title:	Vice President
Date:	November 8, 2007

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Name:	Andrew J. Keleman
Title:	Authorized Representative
Date:	April 1, 2009

American Transmission Systems, Incorporated

By:			
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Name: Richard R. Grigg

Title: President

Date: December 17, 2009

City of Clev	veland, De	partment of	of Public	Utilities
Division of	Cleveland	l Public Po	ower	

By: \_\_\_\_\_\_\_Name: Barry A. Withers

Title: Director

Date: March 22, 2011

Duke Energy Ohio, Inc.			
By: _			
Name:	Julia S. Janson		
Title:	President		
Date:	September 27, 2011		

Duke l	Energy Kentucky, Inc.
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Name:	Julia S. Janson
Title:	President
Date:	September 27, 2011

City of Hamilton, OH				
Ву:				
Name:	Joshua A. Smith			
Title:	City Manager			
Date:	February 29, 2012			

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Name: Jeffrey T. Wood
Title: Senior Vice President
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Name: Austin J. Slater, Jr.
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Name: Justin J. Cooper	
Title: Secretary, Treasurer, and Ch	ief Financial Officer
Date: November 28, 2018	

AMP Transmission, LLC	
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Name: Pamala M. Sullivan	
Title: President	
Date: October 9, 2018	

Transource West Virginia, LLC	
By:	
Name: Antonio P. Smyth	
Title: President	
Date: February 19, 2019	

Silver Run Electric, LLC
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Name: Paul G. Thessen
Title: President
Date: February 27, 2020

NextEra Energy Transmission MidAtlantic Indiana, Inc.	
By:	
Name: Michael Sheehan	
Title: Vice President	
Date: May 7, 2020	

Wabash Valley Power Association, Inc.
By:
Name: Jay Bartlett
Title: Chief Executive Officer
Date: 10/25/19

Keystone Appalachian	Transmission	Company
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By:	
Name: Olenger L. Pannell	

Title: Vice President Date: January 1, 2024