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Thank you for the opportunity to offer a few comments about the December 15, 2016 Transmission Expansion Advisory Committee (TEAC).

1. How can we improve the process for posting information before the meeting? For senior committees like the MRC and MC, information must be posted a week in advance. And while information may come in after that deadline, that late information is presented in as comprehensive a manner as possible and still may not be acted upon due to an inadequate amount of time available to study the issue and discuss it internally.

The type of information provided at the TEAC is just as, if not more so, important and complicated than that before the MRC and MC. Yet, we are making initial and updated postings right up until the day of the meeting. For example, the reliability assessment was posted two days before the meeting and updated the day of the meeting. Absent checking back daily to the website, there is no way to know if new information has been posted.

Please consider:

- Establishment of a one week deadline for presentations
- Developing a TEAC agenda one week in advance
- Mailing out notices of TEAC agenda and presentations one week in advance via TEAC email list
- Adopting a similar process for the sub regional meetings

2. Reliability Analysis Update

- Slides 7-9; AEP's preferred alternative for the consequential load loss associated with the loss of the South Butler- Collingwood Line. While AEP provided additional information since the November 3rd meeting, based on the information in these slides, there is no basis for PJM, or any other stakeholder, to determine if the \$107.7M alternative is superior to the \$76.5M alternative, or if there were other feasible alternatives not evaluated. While consequential load loss makes this a baseline project, there are a number of factors used to attempt to justify the more expensive alternative with no basis. For example:
 - Just because a line was built in the 1950s does not mean it needs to be replaced.
 - Six outages over three years may or may not be indicative of poor reliability. We know nothing of the cause of these outages or their duration.
 - AEP's categorization of line condition is meaningless absent documentation describing the categories as well as its process to rank and prioritize projects. There

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is no information as to how AEP determines how these categories are assigned. Are these AEP reliability criteria or are they discretionary projects dependent on budget dollars?

- How does AEP determine when “anticipated growth” justifies upgraded infrastructure?
 - What LSE customer load and reliability criteria does AEP utilize to determine the need for improvements? Is this the same criteria AEP applies for its distribution load? Did the cooperative have outages in addition to the six referenced earlier?
 - What other alternatives (and associated costs) were evaluated? For example, replacing the 4/0 ACSR with 556 ACSR? Provision of a 138kV feed from Auburn to SDI to address the consequential load loss? I’m sure there would be others, especially if all the relevant transmission lines were shown on the map (see later comment on mapping).
 - Contrast the number of possible solutions offered (18) and feasible solutions available (6) for the DEOK/EKPC in open window 2 (slides 20-24) with those provided for this project (2). The most expensive feasible alternative in the DEOK/EKPC area was \$23.2M versus \$107.7M here.
 - Why are merchant alternatives subjected to a more rigorous evaluation than immediate need transmission owner offerings?
 - There could easily be more examples. My point is PJM should be evaluating these types of projects with the same rigor for other baseline projects whether they are transmission owner or merchant facilities.
- Slides 12, 13; Dominion proposes to rebuild the Mt Storm-Valley-Dooms 500 kV lines with an estimated cost of \$283M.
- In a prior TEAC, Dominion did a good job sharing its concerns with its 500 kV system with PJM and the stakeholder community. Even with such notice, these are immediate need projects. How can we get out ahead of these projects?
 - No alternatives were considered:
 - Please provide the list of thermal and voltage contingencies.
 - What was the estimated cost to correct these contingencies versus rebuilding the lines?
 - What is the current rating on the line and what will the new rating be?
- Could PJM start using the transmission owner provided maps? Often relevant facilities are not included (as in the AEP project mentioned above). It is impossible to understand a transmission line project scope or be in a position to suggest meaningful alternatives absent a clear map.

3. During the November TEAC, PSEG presented a Supplemental Project to install stop joints on a 345kV cable. Will more information supporting this project be forthcoming?

Paul, as always, thanks for your help and insights.

Sincerely,



Edward D. Tatum, Jr.
Vice President Transmission
American Municipal Power