

Requested written comments of the TO Group on scope of the TRPSTF 8/28/2017 Design Components-Solution Matrix items: 2A, 2B, 3A, 5A, 9A, 9B and 10B and Interest Identification (Revised 8/8/2016) items: 5, 6, 9, 10, 11, 20, 24, and 26.

9/8/2017

The above referenced Interest Identification and design components represent changes to transmission owner or PJM asset management and/or planning processes, decision making or responsibilities that;

1.) Violate the TRPSTF Charter

- a. **Mission** - go beyond the mission of “providing more transparency and consistency in the communication and review of projects in the RTEP”.
- b. **Objective #4, Administrative #5** – alternatives providing more transparency and consistency **must** be consistent with the rights and responsibilities of the transmission owners per the CTOA and the Task Force **may not** make recommendations to change a PJM Governing document that would violate the CTOA.

2.) Violate TO legal and contractual rights under the CTOA – TOs transferred specific activities, specifically reserved the right to operate and maintain their facilities as well as the right to decide whether and when to retire any facility. They also reserved all other rights not specifically transferred. The TOs’ retention of their rights under the CTOA was affirmed by the D.C. Circuit.

3.) Violate PJM Operating Agreement provisions –

- a. The Planning Committee **shall** advise the Markets and Reliability Committee and PJM on matters pertaining to system reliability, security, economy of service, and planning strategies and policies and other matters as the Markets and Reliability Committee may request (OA-8.6.1h).
- b. **Contents of the RTEP shall:** take into account the legal and contractual rights and obligations of the Transmission Owners;(1.4diii)

Additionally, item7, related to transmission rates, is out of the scope of the TRPSTF. Nevertheless, TOs agreed to assist PJM and Stakeholders, outside of the TRPSTF, in developing a transmission cost tool based upon publically available information. The tool has been vetted with stakeholders and is near production status as of 8/27/2017.