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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: PPL Electric Utilities Corporation's Project 50864 for Approval to Rebuild the Existing Breinigsville-Alburtis 500 kV Transmission Line in Leigh County, Pennsylvania

Dear Secretary Chiavetta:

On June 23, 2019, PJM Interconnection, L.L.C. ("PJM") provided responses to data requests served by the Pennsylvania Public Utility Commission, Bureau of Technical Utility Services ("PA PUC"), in Docket No. A-2019-3007945. This letter is submitted to supplement PJM's response to TUS-6 in that set of data requests.

PJM's response to TUS-6 provided, in part, that "[t]oday, per Schedule 12 of the PJM Open Access Transmission Tariff [{"Tariff"}], a Form 715 project (if the project were to be approved as such) is allocated 100% to the responsible customers in the zone of the transmission owner who filed the Form 715. The FERC decision accepting that allocation is currently under appeal."

Notwithstanding the accuracy of this portion of PJM's response to TUS-6, PJM directs the PA PUC to related matters of public record. As already noted, the FERC decision accepting the Form 715 cost allocation described above is currently under appeal. The D.C. Circuit issued a decision setting aside the FERC orders approving the allocation of Form 715 projects 100 percent to the zone of the transmission owner who filed the Form 715 criteria, and remanded

the matter to FERC for further proceedings consistent with the D.C. Circuit's opinion.¹ On remand, parties to the appeal have filed motions and comments in the FERC dockets requesting that the FERC either establish remand procedures via paper hearing to determine the appropriate cost allocation methodology,² or confirm that the current Form 715 cost allocation methodology in Tariff, Schedule 12 be removed from the Tariff such that pre-revision Tariff provisions be reinstated.³ To date, the FERC has not directed that the Form 715 cost allocation described above be removed from the Tariff, and the matter remains pending before FERC awaiting response to the motions and comments filed in the above-noted FERC dockets.

Respectfully,

By: 
Pauline Foley
Associate General Counsel

cc: Steven R. Herling

¹ *Old Dominion Elec. Coop. v. FERC*, 898 F.3d 1254 (D.C. Cir. 2018) (finding FERC acted arbitrarily and capriciously in approving the PJM Tariff amendment and set aside the FERC's Orders approving that tariff and applying it to the Dominion projects); *see also Dominion Resources Serv. Inc. v. FERC*, No. 17-1040 (D.C. Cir. Oct. 16, 2018) (ordering the matter be remanded to FERC for further proceedings consistent with the order).

² *PJM Interconnection, L.L.C.*, Motion of Old Dominion Electric Cooperative and Dominion Energy Services for Order on Remand, Docket No. ER15-1344-000, *et al.* (Dec. 7, 2018).

³ *PJM Interconnection, L.L.C.*, Comments of LSP Transmission Holdings, LLC Regarding Commission Action on Remand, Docket No. ER15-1344-000, *et al.* (Jan. 31, 2019); *PJM Interconnection, L.L.C.*, Motion Requesting Remand Procedures of the PJM Transmission Owners, Docket Nos. ER15-1387-001, *et al.* (Nov. 27, 2018).

