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June 12, 2026

Via E-Filing
Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Letter of Notification of Transource Pennsylvania, LLC, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For Approval To Site Seven Substation Cut-In Lines From the Bramah Substation to Points of Interconnection in Peach Bottom Township, York County, Pennsylvania, Docket No. A-2026-3060029

Dear Secretary Homsher:

Enclosed for filing is the Supplemental Response of Transource of Pennsylvania, LLC, ("Transource PA"), to Pennsylvania Public Utility Commission Data Request A-4 issued February 3, 2026, in the above-captioned matter. This Supplemental Response updates Transource PA's prior response of February 16, 2026.

Please contact the undersigned if you have any questions regarding this response. Thank you for your attention to this matter.

Very truly yours,

John F. Povilaitis
Counsel for Transource Pennsylvania, LLC

JFP/psm
Enclosure
cc: Chairman Stephen M. DeFrank; Vice Chairman Kimberly M. Barrow; Commissioner Kathryn L. Zerfuss; Commissioner John F. Coleman, Jr. and Commissioner Ralph V. Yanora (via email only)
Jordan Van Order (via email only)
Darren Gill (via email only)

BUREAU OF TECHNICAL UTILITY SERVICES
DATA REQUESTS
Docket No. A-2026-3060029 (LON)

A-4 Reference the Letter of Notification, Attachment 1, Section 3.1. The need for the subject project, and construction of the Bramah Substation, is in part due to New Jersey's State Agreement to build transmission to support offshore wind. New Jersey has asked PJM to delay all projects approved as part of the State Agreement to support offshore wind. PJM is assessing this request by New Jersey. Please explain how the project may be impacted by New Jersey's request.

RESPONSE:

Based on publicly available information (see BPU Docket No. QO20100630), Transource PA understands that the New Jersey Board of Public Utilities ("NJBPU") and PJM are formally discussing the status of approved projects related to the New Jersey State Agreement Approach. However, the Bramah Substation Project is a multi-driver project which includes multiple project needs including those related to reinforcement of the grid in Northern Virginia and to mitigate the impacts of the planned retirement of the Brandon Shores Generating Unit.

In public documents, PJM has explained that, because the Bramah Substation is a multi-driver project that addresses both public policy and reliability needs, it cannot be delayed regardless of the status of the New Jersey offshore wind program.

RESPONSE PROVIDED BY: Crystal Wood-Hython, Project MGR Staff Sr, American Electric Power

DATE: February 16, 2026

SUPPLEMENTAL RESPONSE:

Transource PA supplements its prior response of February 16, 2026 to Data Request A-4 as follows. On April 22, 2026, the New Jersey Board of Public Utilities ("NJBPU") adopted an Order authorizing its President to execute a Mutual Termination Agreement ("MTA") on behalf of the NJBPU with PJM Interconnection, LLC ("PJM") that addresses the status of electric infrastructure projects related to the New Jersey offshore wind goal through the State Agreement Approach ("SAA") Agreement reached between the NJBPU and PJM.

The MTA has been filed with the Federal Energy Regulatory Commission ("FERC"). Transource PA will advise the Pennsylvania Public Utility Commission ("PaPUC") of any FERC action on the filing.

None of the seven cut-in lines that are the subject of this LON proceeding have been cancelled due to the New Jersey's decision to terminate its previously-announced and approved offshore wind program and all of them will be needed to support the Bramah Substation project.

The Bramah Substation is a Multi-Driver Project intended to implement elements of the SAA as well as reliability needs related to reinforcement of the grid in Northern Virginia and the impacts of the retirement of the Brandon Shores Generating Unit. Among other terms, the MTA provides for the cancellation of a PECO project, PJM Project No. b3737.50, that was intended to bring the 5034 500 kV line into the Bramah Substation, and the 5014 500kV line out of the Bramah Substation. The cut-in lines to the 5034 and 5014 lines (Transource projects b3800.49 and b3800.50) are two of the seven cut-in lines to be connected to the Bramah Substation for which Transource PA has sought LON approval from the PaPUC.

Only PECO's PJM Project No. b3737.50 and Transource's associated cut-in line are addressed by the MTA. However, although PJM Project No. b3737.50 will be cancelled if FERC accepts the MTA for filing, PJM has nonetheless determined that this PECO project and the related Transource cut-in lines are still required to energize the Bramah Substation and meet reliability needs. As explained in more detail in A-4 Attachment 1 of this Supplemental Response, PJM intends for the Peach Bottom-Delta York 500 kV line to still go in and out of the Bramah Substation. Therefore, all seven of the cut-in lines for which Transource PA has sought LON approval continue to be needed.

SUPPLEMENTAL RESPONSE PROVIDED BY: Crystal Wood-Hython, Project MGR Staff Sr, American Electric Power

Dated: June 12, 2026

SUPPLEMENTAL RESPONSE A-4

ATTACHMENT 1

Cut-in the '5034' 500 kV line into Bramah 500 kV Substation

Background

- PJM and the New Jersey Board of Public Utilities (NJBPU) have reached an agreement to wind-down the NJ SAA Agreement via a Mutual Termination Agreement (MTA), through which:
  - Most of the SAA Projects will be terminated and removed from the RTEP; and
  - Six SAA Projects will remain in the RTEP
- The MTA provides that:
  - if the termination of any of the projects identified for cancellation results in reliability violations, PJM will address those violations consistent with established RTEP processes
  - if FERC does not accept the MTA by June 23, 2026, the MTA is void and all of the SAA Projects will remain in the RTEP
- PJM filed the MTA at FERC on April 23, 2026 (Docket No. ER26-2294)
- In connection with anticipated FERC acceptance of the MTA, PJM has initiated analyses to evaluate potential reliability impacts associated with the anticipated cancellation of the identified SAA Projects
- PJM has determined that the cancellation of SAA Project b3737.50 would create reliability and operational concerns associated with the timely energization and operation of the retained Bramah substation and related regional upgrades (including Peach Bottom – Conastone 500kV corridor upgrades)
  - The Bramah substation has a DEA required in-service date of Dec. 31, 2027 and a projected in-service date of Oct. 14, 2027
- The identified reliability need is a direct result of the anticipated post-termination transmission system configuration associated with the proposed MTA
  - Since PJM and the NJBPU only agreed to the terms of the MTA in April 2026, PJM could not have previously identified the immediate reliability need.
- PJM has determined that the identified reliability need requires a solution with an in-service date within three years or less to support the timely completion and energization of the retained regional facilities

SAA Project b3737.50 Cancellation Impact

SAA Project b3737.50 involves bringing the Peach Bottom-Delta York 500 '5034' kV line "in and out" of the Bramah substation by partially demolishing the 5034 line to construct a new Peach Bottom – Bramah – Delta York 500 kV line, with 0.87 miles of cut-in and cut-out lines. The b3737.50 project currently has a projected in-service date of Oct. 14, 2027, at an estimated cost of $12M.

If FERC accepts the MTA by June 23, 2026, NJ SAA project b3737.50 will be canceled. Cancellation of the b3737.50 project will result in the removal of the 500 kV line termination into the Transource Bramah substation (b3737.47) that is intended to energize the Bramah substation, which has a DEA required in-service date of Dec. 31, 2027, and a projected in-service date of Oct. 14, 2027. The cancellation of b3737.50 will thus result in a delay to the Bramah

substation in-service date, as there are no other 500 kV line terminations into the Bramah substation that will be in-service in the required timeframe. The Bramah substation is a multi-driver project (with expanded scope for the PJM RTEP above and beyond what was needed for NJSAA) that is needed as part of the Brandon Shores deactivation mitigation upgrades (b3780 & b3781), and the 2022 RTEP Window 3 solution upgrades (b3800). A delay in the energization of the Bramah substation would thus be impactful to system reliability because the Bramah substation project is required to mitigate generator deliverability violations in the Peach Bottom–Conastone area that are observed in the 2028 RTEP study case.

As such, a new reliability transmission upgrade, with a required in-service date closely aligned with the projected in-service date of the Bramah substation, is required to ensure timely completion of the Bramah substation.

Proposed Solution

The identified solution to address the immediate reliability need described above is to construct transmission facilities necessary to support the timely energization of the Bramah substation and establish the needed Peach Bottom-Conastone 500kV corridor upgrades by bringing the Peach Bottom-Delta York 500 '5034' kV line "in and out" of Bramah substation by partially demolishing the 5034 line to construct a new Peach Bottom – Bramah – Delta York 500 kV line, with 0.87 miles of cut-in and cut-out lines (the "5034 cut-in project").

Completion of the 5034 cut-in project is critical for timely energization of the Bramah substation. This proposed solution ensures efficient utilization of existing ROWs to enhance the capability of the Peach Bottom-Conastone 500kV corridor, enables the Brandon Shores deactivation mitigation projects, and connects the Delta York station to the upgraded 500kV corridor at Bramah. The required in-service date for the 5034 cut-in project is October 14, 2027, and the estimated cost of the project is $12 million.

PJM has not identified any other feasible transmission or non-transmission alternative capable of meeting the required in-service timing.

For the above reasons, and because even an abbreviated competitive window will lead to delays of about six months, thereby significantly delaying completion of the dependent reliability projects, PJM has determined to designate PECO with construction responsibility for the proposed solution to address the immediate reliability need without opening a competitive solicitation window.

PJM notes that this solution will only be required if FERC accepts the MTA by June 23, 2026, as requested.

VERIFICATION

I, Crystal L. Wood-Hython, Project Manager Staff Sr, American Electric Power, hereby state that the foregoing response is true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: June 12, 2026

By: /s/ Crystal L. Wood-Hython
Crystal L. Wood-Hython
Project Manager Staff Sr
American Electric Power