

COMMONWEALTH OF PENNSYLVANIA



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October 14, 2026

Via Electronic Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Pennsylvania Accelerated
Transmission and Energy
Redevelopment (PATER) Study,
Docket No. M-2026-3059601

Dear Secretary Homsher:

Enclosed for electronic filing in this proceeding, please find the Comments of the Pennsylvania Office of Consumer Advocate in this proceeding.

Respectfully submitted,

/s/ Harrison W. Breitman
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Enclosures

cc: Elizabeth Barnes (email only: ebarnes@pa.gov)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Accelerated Transmission and	:	
Energy Redevelopment (PATER) Study	:	Docket No. M-2026-3059601
	:	
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COMMENTS OF THE
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

I. INTRODUCTION

The Pennsylvania Office of Consumer Advocate (OCA) represents utility consumers before the Pennsylvania Public Utility Commission (Commission), federal regulatory agencies, and state and federal courts.¹ Herein, the OCA offers brief comments on the Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) initiative (PATER Project), which is designed to deliver insights in a form that supports action by the Commonwealth and PJM Interconnection (PJM).

II. COLLABORATION WITH PJM

As the OCA is concerned with the costs of electricity in the Commonwealth (and therefore, the wholesale costs at PJM), there may be an opportunity for the insights developed in the PATER Project to cost-effectively alleviate the upcoming generation supply shortage beginning in June 2027 (a reliability and affordability issue) discussed by presenters/panelists at the meeting held on October 7, 2026.²

¹ See <https://www.oa.pa.gov/>.

² “The capacity of the resources procured in the auction, plus FRR resources, is short of PJM’s reliability requirement by 6,623 MW, meaning that the committed supply is less than what would be required to meet the one-event-in-10-

The OCA recommends that conclusions ultimately identified in the PATER Project be mindful of PJM processes which are complex, in flux, and which are likely developed without consideration of the timing of the PATER Project.³ As such, the OCA recommends that the team working on PATER should closely collaborate with PJM to ensure that PJM's processes are taken into account. This could result in further benefits for the Commonwealth. For example, the information provided in PATER Part A would have been informative for the development community who participated in Cycle 1 of PJM's reformed interconnection process.⁴ Similarly, the PATER analysis used the 2025 Regional Transmission Expansion Plan (RTEP) contingencies as an input, yet actual transmission solutions were proposed in response to those same contingencies.⁵ Ensuring that important stakeholders, such as PJM, are included in the development of the PATER Project could help promote cost-effective infrastructure development and would likely enhance the alleviation of supply shortages given PJM's unique specialization as Pennsylvania's Regional Transmission Organization.

III. GENERATION CAPACITY

As the Commonwealth does not have an energy office or agency that is tasked with energy planning (i.e., does not have an integrated resource plan or similar process),⁶ the OCA would appreciate clarification regarding which Commonwealth entity, office, or agency would be in charge of reaching out to potential developers and/or coordinating any grants or incentives for this

year reliability standard of a 20% reserve margin." See "PJM Auction Procures 134,479 MW of Generation Resources" available at <https://insidelines.pjm.com/pjm-auction-procures-134479-mw-of-generation-resources/>.

³ An example is revamping of planning process considered in the Co-Located Load Order Workshop available at <https://www.pjm.com/committees-and-groups/workshops/cllsco>.

⁴ See "Over 700 New Generation Projects Accepted Into First Cycle of Reformed Interconnection Process" available at <https://insidelines.pjm.com/over-700-new-generation-projects-accepted-into-first-cycle-of-reformed-interconnection-process>.

⁵ "PJM's RTEP process identified 122 new baseline projects to maintain fundamental grid reliability in the face of markedly changing regional power flows, at an estimated cost of \$11.8 billion." See "PJM Report Highlights 2025 Planning Efforts" available at <https://insidelines.pjm.com/pjm-report-highlights-2025-planning-efforts>.

⁶ <https://www.synapse-energy.com/expertise/electric-system-planning-wholesale-markets/resource-planning>.

development. Additionally, regarding grants and incentives, the OCA notes that the PATER Project team should consider currently existing models, such as the Texas Energy Fund.⁷ Clarification as to planning, administrative, and funding considerations would help explain how PATER Project development would be operationalized within the Commonwealth's existing regulatory framework.

IV. TRANSMISSION COST ALLOCATION

In PJM, the State Agreement Approach (SAA) may be considered to build and efficiently allocate transmission facilities. Under the State Agreement Approach, states can propose a transmission project for inclusion in PJM's RTEP that advances the state's policies, **“as long as the state agrees to assume the cost of the project's build-out.”**⁸ While the State Agreement Approach could be beneficial, under this approach, Pennsylvania's ratepayers would be required to pay 100% of the costs of any new transmission even if the new transmission has regional benefits. This could unfairly burden Pennsylvania's ratepayers with additional costs while other states receive benefits at no cost. Instead, to the extent the PATER team is considering SSA, tying new transmission into existing PJM processes may result in the same end goal of new transmission being built, but with a fairer and more just allocation of costs to all who may benefit.

⁷ See <https://www.puc.texas.gov/industry/electric/business/texas-energy-fund>.

⁸ See “The State Agreement Approach” available at <https://www.pjm.com/-/media/DotCom/about-pjm/newsroom/fact-sheets/the-state-agreement-approach.pdf>.

V. CONCLUSION

The OCA appreciates the opportunity to provide comments on the Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) initiative. The OCA respectfully requests that the PATER team provide the above-requested clarifications in Part B of its study.

Respectfully submitted,

/s/ Harrison W. Breitman

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