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Attachment M-3 Update

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Transmission Planning

Planning Committee
March 9, 2021

- Review of Improvements
- PJM Observations
- Review Open Items
- Stakeholder feedback

- **Issue:** Concerns about Planning Community questions not being addressed appropriately
- **Resolution:** Instituted process to review questions and ensure they are properly routed to the appropriate transmission owners

- **Issue:** Requests for additional information at Needs phase
 - **Observation:** Fewer requests for information are not addressed during meetings
 - **Observation:** Stakeholders should be entering questions/request into Planning Community in advance of meeting to track issues and promote transparency.

- **Issue:** Projects have received permits prior to need being presented
 - **Observation:** Recent accelerated projects related to customer requests and may require permits be pursued in parallel

- **Issue:** Stakeholders requesting consistency among transmission owners regarding factors used in expressing material conditions of facilities
 - **Observation:** Transmission Owners have been providing additional details regarding material conditions.
 - **Observation:** FERC approved modification of Attachment M-3

- Map project
 - Delayed until 2021 due to budget constraints
- Time between when need is introduced and solution is provided not defined
- Request that transmission owner prioritize needs

- Items identified as Improvements
- Items identified under Observations
- Multiple items which disagree with process approved by FERC
 - 10 day deadline is not sufficient
 - Data not being provided with which to replicate the analyses
 - Requests for transmission owners to have consistent guidelines for evaluating the need to present an M-3 need (outage statistics)

See appendix for items to close from Action Item list – Request stakeholder feedback regarding any clarifications needed

Full Action Item list at the link below:

<https://www.pjm.com/-/media/committees-groups/committees/teac/2021/20210309/20210309-teac-info-only-m-3-action-items.ashx>

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Stakeholder Discussion

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Appendix

| Item Number | Action Item |
|-------------|---|
| 13 | <p>TOs are presenting Needs but most are providing insufficient information to stakeholders to validate that the identified Needs are justified</p> <ul style="list-style-type: none"> • Most of the TOs are not providing enough information or timely information for Stakeholders to replicate their results per FERC Show cause Orders • For condition drivers, TO's present the number of structures and the number of open conditions, but only some provide the number of structures with open conditions • Most TOs cite the number of outages as a driver for condition/performance need, but do not provide cause of outages, and ordinarily do not have information on hand • [10/11/2019] Request that cause of outages be provided in addition to the number of outages • Some consistency needed with factors used to determine need based on performance, such as SAIDI, SAIFI and CAIDI, particularly as to # of years used to calculate and what data set is used (service to other utilities vs. vertically integrated distribution affiliate) • TOs cite age of initial line as vintage of entire line, without providing percentage of total line that is original vintage • There is no contact information on slides this creates more timing hurdles • 10-day input deadline is a deadline to fail when: <ol style="list-style-type: none"> 1. The proposal does not include an adequate level of information 2. Requests for information are left unanswered 3. There is no process to get answers or follow-up • Certain TOs are not providing information or appropriate granularity • Many of the criteria that are provided include poorly-defined or nonexistent criteria and no criteria thresholds • Additional transparency regarding criteria definitions requested • Many of the assumptions that are provided are overly broad or conservative, ill-defined, and/or include "catch all" statements • [10/11/2019] CAPS requests more details at the Needs meeting to add necessary value for CAPS participation in the Alternatives and Solutions phase • [10/11/2019] Some TOs providing conflicting Needs and Drivers • [10/11/2019] Needs not detailed enough in some cases for stakeholders to participate meaningfully in the process • Many Solutions address issues or assets not identified in the Needs statements • When an assumption is tied to an M3 need, please provide the quantitative value associated this assumption (ie: elevated gas levels yield x% increase in gas levels) (5/22/2020) <p>Where are actionable levels identified, can TO point to a criteria when they make statements along the lines of "elevated gas levels" (5/22/2020)</p> |

Items highlighted in red proposed to be closed absent additional stakeholder feedback.

Action Item List To Close

| Item Number | Action Item |
|-------------|---|
| 18 | Some projects have received regulatory permits prior to the Need being presented |
| | M-3 does not include any specified timeline between when a Need is submitted and a Solution is proposed |
| 25 | When a credible, identified Need is identified – how long should it take to see a proposed Solution? Might Need criteria help? |
| | Are drivers and driver details consistent across a TO's projects? Across TO's? |
| | Looking for more information at the needs phase |
| 30 | Desire to have a ranking of Needs – more information at the Needs phase is desired. Desire for “ranking/prioritizing” Needs |
| | Responsiveness to Planning Community questions is improving but frustration continues from non-responses. Better to receive a “No or No Answer” rather than non-response. |
| 33 | Looking for training on Planning Community concerning how to enter information |

Items highlighted in red proposed to be closed absent additional stakeholder feedback.