February 11, 2019

PJM Board of Managers
c/o Ake Almgren, Ph.D., Chairman
2750 Monroe Boulevard
Audubon, PA 19403

Re: Transparency for Supplemental Projects

Dear Dr. Almgren and the PJM Board of Managers:

We are writing to urge the PJM Board of Managers to give careful consideration to the concerns raised by load interests ("Load Group") in their letter submitted to the Board on February 8, 2019. The Load Group objects to a recent decision by PJM staff not to implement changes to PJM's Manual 14B: *PJM Region Transmission Planning Process* that would have provided stakeholders with greater transparency for Supplemental Projects in the PJM transmission planning process.

Increasing transmission costs are a matter of significant concern for our members. In the PJM region, there has been a marked rise in transmission costs in recent years, accompanied by a substantial increase in Supplemental Projects. The Load Group explains that, of the record $7.8 billion in proposed transmission projects in 2018, $5.7 billion was attributable to Supplemental Projects. The recently-rejected Manual 14B revisions would have afforded stakeholders additional transparency concerning the basis, cost, timing, and need for proposed Supplemental Projects. Transparency and opportunity for meaningful stakeholder participation in Supplemental Project planning help ensure that these projects will be cost-effective and beneficial to customers. Broadly-supported PJM Manual changes designed to increase transparency in planning Supplemental Projects, therefore, should not be rejected absent a compelling justification. We urge the Board to carefully consider the Load Group's arguments that such a justification was lacking in the case of the rejected changes to Manual 14B.

Thank you very much for your consideration of this important issue.

Sincerely yours,

Susan N. Kelly
President and Chief Executive Officer
American Public Power Association

John Twitty
Executive Director
Transmission Access Policy Study Group