AEP Comments to October 30, 2006, TEAC Meeting
Backbone Transmission Alternatives

AEP appreciates the opportunity to comment on the material presented by PJM during the October 30, 2006, TEAC meeting. Specifically, AEP would like to offer the following comments for PJM's consideration during the evaluation of the backbone transmission alternatives.

(1) Given the study results PJM presented during the October 30th TEAC meeting, it would appear that variations of the alternatives on the "A List" may merit consideration and analysis by PJM. For example, the Amos-Kemptown 765 kV line could be paired up with the Kammer-TMI 765 kV line to create an additional alternative. Separately, the Amos-Kemptown 765 kV line could be paired up with the Kammer-502 Junction 765 kV line to form another alternative. Other combinations may also merit consideration and could be evaluated by PJM in an effort to identify the most robust backbone transmission alternatives.

(2) In an effort to optimize the backbone transmission alternatives, PJM may want to consider additional intermediate connections for some of the alternatives. For example, the Amos-Kemptown 765 kV line could be connected to existing or planned 500 kV lines that it will cross before reaching the Kemptown station.

(3) Additional optimization of the backbone transmission alternatives may be possible. The splitting of existing stations, such as Mount Storm and Doubs, and the reconfiguration of existing transmission lines, may merit consideration. Such topology changes may provide an effective means of improving the distribution of base flows, thus addressing some of the loading concerns that may result under single and higher order contingencies.

(4) To date, the PJM evaluation of the backbone transmission alternatives appears to have been focused on just NERC Category B contingencies. At some point in this analysis, NERC Category C and D contingencies will also need to be considered to ensure that the selected transmission expansion plan does not create any major cascading liabilities. Station outages (such as Kammer, Mount Storm, Doubs, etc.) may become of particular concern given the additional EHV transmission facilities that may be connected to some of these stations.

November 29, 2006