June 18, 2007

Via email: pjm_rtep@pjm.com
and U.S. Mail

Steven R. Herling, Vice President – System Planning
PJM Interconnection, L.L.C.
955 Jefferson Avenue
Valley Forge Corporation Center
Norristown, PA 19403-2497

Dear Mr. Herling:

Allegheny Power (AP) strongly supports PJM's recommended solutions to the reliability issues addressed at the TEAC meeting on May 9, 2007. Specifically, AP supports the solution to address the reliability criteria violations as identified under backbone upgrades for the Allegheny Mountain Corridor found on page 45 of the TEAC presentation.

Allegheny Power believes the PJM recommendation to build a new 765kV transmission line from John Amos substation in West Virginia to Bedington substation in West Virginia and extending a twin 500kV line to a new substation in Kemptown, Maryland near the Doubs-Brighton and Brighton-Conastone 500kV lines will ultimately address many of the significant reliability issues identified during this year's 15 year planning process.

Although PJM has primary planning responsibility for AP's transmission system, AP has thoroughly analyzed numerous options to relieve loading on several heavily loaded facilities, including the Mt. Storm-Doub, the Pruntytown-Mt. Storm, the Black Oak-Mt. Bedington, the Pruntytown-Mt. Storm, the Harrison-Pruntytown, the Greenland Gap-Meadow Brook, and the Mt. Storm-Greenland Gap 500kV lines in anticipation of imminent reliability criteria violations. Allegheny Power also has concluded that PJM has identified an appropriate solution to these reliability violations and that it also compliments the proposed 502 Junction-Mt. Storm-Meadow Brook-Loudoun 500kV line in resolving long-term reliability issues on the bulk transmission network throughout the AP Zone and a large portion of the PJM footprint. AP continues to support PJM's view, as demonstrated by this proposed solution, that the reliability of the bulk transmission network is essential to all users of the transmission grid.
Time is of the essence in enhancing the reliability of the PJM Transmission System. The imminent reliability issues identified at the May 9, 2007 TEAC presentation are well known within the PJM stakeholder community. PJM’s proposed solution is cost effective and viable. Constructing a project of this magnitude within the proposed timeline is an extremely aggressive schedule. Any delays in the issuance of a final authorization for this project will significantly diminish the opportunity that now exists to meet PJM’s projected in-service date of June 2012.

AP strongly recommends that the PJM Board authorize the reliability projects identified at the May 9, 2007 TEAC meeting at its June 2007 meeting.

Sincerely,

James R. Haney
Vice President, Transmission

JRH:mlb

C: D. E. Flitman
M. J. Kormos