

Brewster-E. Wilmot Greenfield 69 kV Line & Station

General Information

Proposing entity name	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Company proposal ID	Proposal 2 (Brewster-E. Wilmot)
PJM Proposal ID	991
Project title	Brewster-E. Wilmot Greenfield 69 kV Line & Station
Project description	Designated Entity Statement of Intent: The Proposing Entity seeks consideration as the Designated Entity for the Project. If selected, the Proposing Entity reserves the right to assign the Project to any of its affiliate(s) if circumstances deem appropriate. Any future assignment to affiliate(s) would be with PJM-established entities. The Proposing Entity does not foresee any potential assignment materially impacting the Project's constructability or schedule. Project Description Info: Build a greenfield 69 kV station "East Wilmot" to tap the AEP owned line from Beartown station to the future Alpine station (Currently West Wilmot Jct SW). Build East Wilmot station as a 3 breaker ring bus. Build a 5.3 mile greenfield 69 kV line from Brewster station to East Wilmot station. Perform station work at Brewster to accommodate the new line. This project will satisfy AMPT's 3.2.7 Delivery Point Exposure Criteria by connecting a second independent source to the load delivery point at Brewster station. Tie-line Impact Info: The proposed greenfield 69 kV line will connect two PJM transmission owner zones: Area 202 ATSI (Brewster Station) and Area 205 AEP (East Wilmot Station).
Project in-service date	06/2024
Tie-line impact	Yes
Interregional project	No
Is the proposer offering a binding cap on capital costs?	Yes

Additional benefits

Project Components

1. Greenfield 69 kV Line

- 2. East Wilmot 69 kV Station Cut In Lines
- 3. Greenfield Station
- 4. Brewster Station Upgrade

Greenfield Transmission Line Component

Component title	Greenfield 69 kV Line	
Point A	Brewster Station 69kV -239767	
Point B	East Wilmot Station 69kV - 123456	
Point C		
	Normal ratings	Emergency ratings
Summer (MVA)	93.000000	128.000000
Winter (MVA)	117.000000	144.000000
Conductor size and type	The new line will be constructed using 477 (26/7) ACSR Hawk conductor.	
Nominal voltage	AC	
Nominal voltage	The new line will be constructed as a 69kV AC line.	
Line construction type	Overhead	

General route description

The Proposing Entity reviewed numerous route combinations evaluating each with respect to potential impacts to the surrounding communities, environment, constructability, operations and maintenance considerations, and cost effectiveness. Solutions were initially considered within a study area of 10mi² (see attached kmz), as the Proposed Solution utilized the proposed East Wilmot Station location and the existing Brewster Substation. This area was further refined based on an assessment of the existing infrastructure and the availability of property and/or suitable space. The Proposing Entity's Siting Team reviewed routes paralleling roads, railroad lines, and parcel boundaries from the two project endpoints. Potential Routes were dismissed due to conflicts with the identified constraints in the study area. Major constraints include National Wetland Inventory (NWI) identified wetlands along the North Fork of the Sugar Creek, existing gas transmission lines, Beach City Airport, and several smaller constraints including cemeteries and habitable structures. Many of the identified constraints in the area were avoided or minimized by the Proposed Route. Starting at the Proposing Entity's proposed East Wilmot Substation, the Proposed Route is approximately 5.3 miles in length and is located mainly along agricultural parcels (with scattered residential development) up to AMPT's Brewster Substation. The Proposed Route parallels parcel boundaries instead of overbuilding distribution lines within road ROW, which would bring the new transmission line within proximity of several habitable structures and require tree clearing along roads. The Proposed Route avoids the impacts of a cemetery and commercial and residential development where U.S. Route 62 and County Route 93 intersect, in the center of Sugarcreek Township. Potential routes paralleling railroads were also dismissed. The Siting Team concluded there are several homes along the railroad lines that would require making separate crossings to avoid impacts with a proposed 60 ft. ROW; the rail lines are elevated so there could be substantial wetland mitigation as wetlands typically form along rail lines and there are already several streams and associated NWI areas; while there are less landowners and residential structures near the rail line, those landowners prove generally difficult with obtaining ROW as we'd need to remove trees near their homes which serve as their sound/visual buffer.

Terrain description

The Project terrain is predominately rolling agricultural lands with scattered residential in Stark County, Ohio. Elevation within the Study Area ranges from approximately 958 to 1,042 feet above sea level, with an average elevation of 985 feet.

Right-of-way width by segment

The proposed East Wilmot - Brewster 69kV Line will require the acquisition of 5.33 miles of transmission line of 60' (30'/30') wide ROW. The project will begin at the proposing entity's proposed East Wilmot Station in Stark County, Ohio and run in a northerly direction to the existing Brewster Station in Stark County, Ohio. The tabletop analysis found there were no public lands required for this Project. The private land use is predominantly agricultural and scattered residential that the tabletop analysis found and was verified through the Stark County Clerk's Office which classified/assessed the land use as agricultural and residential. The Proposing Entity will use proven land acquisition processes and approaches that have been successfully employed on projects over the years. The Proposing Entity's initial land acquisition step is to verify current ownership by an examination of title, current property tax status, as well as document any liens, and or mortgages. The Proposing Entity will also research the status of the subsurface estate, to determine whether it is severed from the surface. Once ownership is established, the Proposing Entity will negotiate with landowners based on the fair market value of the property needed for the ROW easements. Market data studies and appraisals, both general and for specific tracts, will be conducted to establish values and a basis for acquisition negotiations. The Proposing Entity will also pay for any crop damage and/or physical damage to property resulting from the construction and/or maintenance of the transmission line. Good Faith negotiations must be made with all landowners. Negotiations will be done in an ethical, non-confrontational and non-threatening manner with the landowners. The long term relationship with the landowners is paramount and will be kept in mind in all negotiations and honesty, integrity and professionalism will be displayed at all times. Negotiations will continue as long as practical to reach a voluntary agreement. If, and only if, it becomes evident that a voluntary fee purchase agreement between the Proposing Entity and the property owner cannot be reached, and other viable alternatives do not exist, the we may exercise the right of eminent domain to secure required property through condemnation proceedings.

Electrical transmission infrastructure crossings

The Project in Stark County, Ohio will not involve any electrical transmission infrastructure crossings.

Civil infrastructure/major waterway facility crossing plan

The Project will involve one (1) electrical transmission crossing over one (1) levee belonging to the United States of America in Stark County, Ohio at 40deg42'-13.74"N; 81deg35'-52.80"W. The Proposing Entity will follow standard operating procedures and guidelines set forth by the U.S. Army Corps of Engineers for routing of electrical lines over levees. Required permitting will be obtained in a timely manner in order to avoid schedule delays.

Environmental impacts

Existing land along the route is rural, agricultural, and adjacent to roadways. Sugar Creek, associated tributaries, and the Sugar Creek 100-year floodplain transects several locations along the line. Based on review of the National Wetland Inventory and aerial photographs, wetlands are located along the northern portion of the route. To ensure appropriate due diligence, desktop studies and records reviews will be conducted for wetlands and streams, threatened and endangered species, and cultural and archaeological resources. Additionally, a field level stream/wetland delineation, habitat survey for species identified by the records review, and cultural/archaeological resource study will be performed for the line route. Following field studies, data will be digitized and provided to Engineering so that pole locations are sited to maximize avoidance of sensitive resources. For example, poles will be placed outside of or span wetlands, streams, and/or floodplains to the greatest extent possible. Existing access and roads will be utilized to access pole locations. If necessary, temporary access roads to pole locations will be identified and field surveyed for environmental and cultural/archaeological resources and will be adjusted to avoid or minimize impacts. For ground disturbance, a storm water pollution prevention plan will be developed that specifies practices to manage construction storm water runoff. The project will apply for an Ohio EPA general construction storm water permit. Application for a Stark County construction storm water permit will also be made. For temporary access and pole foundations within floodplains that cannot be avoided, an application for a floodplain permit will be made to the Stark County Soil and Water Conservation District. Physical impacts to streams are not anticipated. It is anticipated a Section 404 Permit from the Army Corps of Engineers and Section 401 Water Quality Certification from Ohio EPA will be required for temporary access, pole foundations within delineated wetlands, and forested wetland conversion for the new right-of-way. Timing of construction will be executed in accordance with U.S. Fish and Wildlife Service and Ohio Department of Natural Resources criteria.

Tower characteristics

The new 69kV line will require (55) tubular galvanized steel pole pole structures. The predominate structure type (41 structures) will be a tangent monopoles with braced post insulators arranged in an alternating configuration. Additionally, the line will also require (4) vertically configured running angle poles, and (10) deadend structures. The tangent pole structures will be supported by direct embedded foundations. The running angle pole structures will be supported by direct embedded foundations and guy and anchor systems. The deadend pole structures will be supported by a combination of direct embedded foundations with guy and anchor systems, and concrete pier foundations utilizing full length anchor bolts. A sketch of the structures is attached.

Construction responsibility

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Additional comments

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Component Cost Details - In Current Year \$

Engineering & design

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Permitting / routing / siting	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
ROW / land acquisition	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Materials & equipment	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Construction & commissioning	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Construction management	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Overheads & miscellaneous costs	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Contingency	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Total component cost	\$6,086,271.00
Component cost (in-service year)	\$6,650,634.00

Greenfield Transmission Line Component

Component title	East Wilmot 69 kV Station Cut In Lines	
Point A	Beartown Station 69 kV - 245214	
Point B	East Wilmot Station 69 kV - 123456	
Point C	Alpine Station 69 kV - 290062	
	Normal ratings	Emergency ratings
Summer (MVA)	102.200000	142.100000
Winter (MVA)	129.100000	159.700000
Conductor size and type	The new lines will be constructed using 477 (26/7) ACSR Hawk conductor.	

Nominal voltage	AC
Nominal voltage	The new tie lines will be constructed as 69kV AC lines.
Line construction type	Overhead
General route description	The Proposing Entity reviewed locations for the two (2) single circuit 69kV transmission tie lines proposed between the proposed East Wilmot Station and AEP's existing Beartown – West Wilmot 69kV Line. The locations of the tie-lines were evaluated with respect to potential impacts to the surrounding communities, environment, constructability, operations and maintenance considerations, and cost effectiveness. The proposed tie-line locations and ROW are located within the same landowner as the proposed East Wilmot Station location and will avoid tree clearing and other environmental impacts.
Terrain description	The Project terrain is predominately rolling agricultural lands with scattered residential in Stark County, Ohio.
Right-of-way width by segment	The proposed East Wilmot Station 69kV Tie Line will require the acquisition of 0.04 of a mile of 60' (30'/30') wide ROW. The project will begin at the Proposing Entity's proposed East Wilmot Station in Stark County, Ohio and run in a southerly direction to the existing AEP Beartown-West Wilmot 69kV Line in Stark County, Ohio. The tabletop analysis found there were no public lands required for this Project. The private land use is predominantly agricultural and scattered residential that the tabletop analysis found and was verified through the Stark County Clerk's Office which classified/assessed the land use as agricultural. The Proposing Entity will use proven land acquisition processes and approaches that have been successfully employed on projects over the years. Our initial land acquisition step is to verify current ownership by an examination of title, current property tax status, as well as document any liens, and or mortgages. We will also research the status of the subsurface estate, whether or not it is severed from the surface. Once ownership is established, we will negotiate with landowners based on the fair market value of the property needed for the ROW easements. Market data studies and appraisals, both general and for specific tracts, will be conducted to establish values and a basis for acquisition negotiations. We will also pay for any crop damage and/or physical damage to property resulting from the construction and/or maintenance of the transmission line. Good Faith negotiations must be made with all landowners. Negotiations will be done in an ethical, non-confrontational and non-threatening manner with the landowners. The long term relationship with the landowners is paramount and will be kept in mind in all negotiations and honesty, integrity and professionalism will be displayed at all times. Negotiations will continue as long as practical to reach a voluntary agreement. If, and only if, it becomes evident that a voluntary fee purchase agreement between the Proposing Entity and the property owner cannot be reached, and other viable alternatives do not exist, we may exercise the right of eminent domain to secure required property through condemnation proceedings.
Electrical transmission infrastructure crossings	The Project in Stark County, Ohio will not involve any electrical transmission infrastructure crossings.

Civil infrastructure/major waterway facility crossing plan

The Project in Stark County, Ohio will not involve any civil infrastructure/major waterway facility crossings.

Environmental impacts

Existing land along the route is agricultural. Based on review of the National Wetland Inventory and aerial photographs, no wetlands are located within this portion of the route. To ensure appropriate due diligence, desktop studies and records reviews will be conducted for wetlands and streams, hazardous materials, threatened and endangered species, and cultural and archaeological resources. Additionally, a field level stream/wetland delineation, habitat survey for species identified by the records review, and cultural/archaeological resource study will be performed for the route. Following field studies, data will be digitized and provided to Engineering so that pole locations and the station is sited to maximize avoidance of sensitive resources. Temporary access roads to pole locations will be identified and field surveyed for environmental and cultural/archaeological resources and will be adjusted to avoid or minimize impacts. For ground disturbance > 1 acre, a storm water pollution prevention plan will be developed that specifies practices to manage construction storm water runoff. The project will apply for an Ohio EPA general construction storm water permit. If necessary, application for a Stark County construction storm water permit will also be made. Physical impacts to streams or wetlands in this area is not anticipated.

Tower characteristics

Each new 69kV tie line will require (1) tubular galvanized steel pole deadend structure. The vertically configured monopole structures will be supported by direct embedded foundations and guy and anchor systems. The arrangement of the structures is shown in the attachments for the East Wilmot station component. A sketch of the structure is attached.

Construction responsibility

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Additional comments

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Component Cost Details - In Current Year \$

Engineering & design

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Permitting / routing / siting

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

ROW / land acquisition

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Materials & equipment

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Construction & commissioning	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Construction management	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Overheads & miscellaneous costs	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Contingency	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Total component cost	\$201,898.00
Component cost (in-service year)	\$220,619.00

Greenfield Substation Component

Component title	Greenfield Station
Substation name	East Wilmot
Substation description	Construct a 69KV greenfield station having a three (3) circuit breaker ring bus that will interconnect the existing 69KV Beartown line, the existing 69KV West Wilmont Junction Sw. line and a new 69KV line to the existing Brewster Station. The station will be established on a 350ft x 300ft property approximately located at GPS coordinates (40.643647, -81.591717) and have a fenced area of 180ft x 200ft. It is assumed that this property will be available for purchase.
Nominal voltage	AC
Nominal voltage	69 kV

Transformer Information

None

Outreach plan

Public outreach is a critical component to The Proposing Entity's siting process, so efforts include properly informing the public; federal, state and local agencies; local governments; and other key stakeholders on the need for, and benefits of, this project. The Proposing Entity's approach to public outreach is to always be candid and transparent, and to offer a variety of tools and means for impacted parties to engage with our staff. Public outreach also involves collecting information about landowner properties, which we consider during the final siting process. Proactive and interactive communication strategies and tools are used to assist siting efforts by soliciting comments and concerns from persons and entities affected by the project. These strategies and tools also assist in garnering support for the line siting process, as well as promote clear communication to landowners during land/ROW acquisition. The Proposing Entity plans to host one (1) public open house meeting in Brewster, Ohio to engage with the community and collect feedback on the project. We plan to invite landowners within 1,000 feet of the proposed transmission line and station to attend the open house and provide them with an opportunity to review detailed maps and provide comments as it relates to the project and their property. These comments are a key component on refining the power line route. The Proposing Entity also plans to inform the public via news release and reserve a notice in the local newspaper so community members can participate. Also, the Proposing Entity plans to have an interactive website so the public can obtain the same information that's provided at the open house, submit their comments and receive regular and timely project updates. Open houses consist of multiple informational stations set as a workshop-style event, designed to educate the public on different aspects of the project, including: purpose, need, engineering, structure type, and the Land/ROW acquisitions processes. While the Proposing Entity is confident in the route selected, it's important to engage the public before initiating land/ROW acquisition. This process can identify unique items such as wells, geological formations and other features which must be considered in selecting the route to acquire land/ROW.

Land acquisition plan

The proposed East Wilmot Station will be sited off Kaylor Avenue SW, just south of Sandusky Drive SW (Highway 250) in Stark County, Ohio on undeveloped land agricultural lands. The tabletop analysis found there were no public lands required for this Project. The private land use is agricultural as tabletop analysis found and was verified through the Stark County Clerk's Office which classified/assessed the land use as agricultural. The private land requirements include approximately 2.10 acres for the new station site/detention pond/grading and access will be off Kaylor Avenue SW to the new station site. The total Station Project acreage is 2.10 acres to be purchased in fee. Station site and access were chosen to minimize impacting farming operations. The Proposing Entity will use proven land acquisition processes and approaches that have been successfully employed on projects over the years. Our initial land acquisition step is to verify current ownership by an examination of title, current property tax status, as well as document any liens, and or mortgages. We will also research the status of the subsurface estate, whether or not it is severed from the surface. Once ownership is established, we will negotiate with property owners based on the fair market value of the property needed for the station site and access road (both fee purchases). Market data studies and appraisals, both general and for specific tracts, will be conducted to establish values and a basis for acquisition negotiations. Good Faith negotiations must be made with all landowners. Negotiations will be done in an ethical, non-confrontational and non-threatening manner with the landowners. The long term relationship with the landowners is paramount and will be kept in mind in all negotiations and honesty, integrity and professionalism will be displayed at all times. Negotiations will continue as long as practical to reach a voluntary agreement. If, and only if, it becomes evident that a voluntary fee purchase agreement between the Proposing Entity and the property owner cannot be reached, and other viable alternatives do not exist, we may exercise the right of eminent domain to secure required property through condemnation proceedings.

Construction responsibility

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Additional comments

Component Cost Details - In Current Year \$

Engineering & design

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Permitting / routing / siting

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

ROW / land acquisition

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Materials & equipment

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Construction & commissioning	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Construction management	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Overheads & miscellaneous costs	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Contingency	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Total component cost	\$4,884,223.00
Component cost (in-service year)	\$5,337,122.00

Substation Upgrade Component

Component title	Brewster Station Upgrade
Substation name	Brewster Station 69 kV - 239767
Substation zone	Area 202 ATSI – Zone 1234 FE-MASS
Substation upgrade scope	Retire portions of the existing 69 kV bus as Brewster station and install associated station equipment to terminate the greenfield 69 kV line from East Wilmot station into the second 69 kV breaker position.

Transformer Information

None	
New equipment description	Install 2-sets of 3-69KV line CCVTs & steel str.; 2-69KV bus CCVTs & steel str. to be located along the existing 69KV bus at two different locations; and associated bus jumpers, foundations, control cables, conduits, and equipment grounding. Install associated relay equipment in the existing control house. Expand the station fenced area 20ft to the east including 160ft of fencing, 3-20ft gates, station stone, ground grid expansion, and fence grounding. Remove approximately 120ft of fencing and 3-gates (East end of station).

Substation assumptions	This proposal assumes that the existing AC & DC systems will accommodate the new equipment, the existing control house has space for the new relay equipment, ground grid resistivity test data are available, soil boring logs and geotechnical report are available, all necessary outages will be available, and space for the proposed expansion of the station will be available along with space to install the equipment outlined in this description.
Real-estate description	The incumbent's existing Brewster Station fence will need expanding in an easterly direction in land presently owned by the incumbent. The fence expansion will not require any additional real estate to be purchased for the project in Stark County, Ohio.
Construction responsibility	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Additional comments	
Component Cost Details - In Current Year \$	
Engineering & design	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Permitting / routing / siting	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
ROW / land acquisition	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Materials & equipment	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Construction & commissioning	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Construction management	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Overheads & miscellaneous costs	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Contingency	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Total component cost	\$647,713.00

Component cost (in-service year)

\$707,773.00

Congestion Drivers

None

Existing Flowgates

FG #	From Bus No.	From Bus Name	To Bus No.	To Bus Name	CKT	Voltage	TO Zone	Analysis type
AMPT-O1	239767	02BREWSTR	239355	02HARMON	1	69	202	FERC 715

New Flowgates

None

Financial Information

Capital spend start date

01/2022

Construction start date

09/2022

Project Duration (In Months)

29

Cost Containment Commitment

Cost cap (in current year)

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Cost cap (in-service year)

The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Components covered by cost containment

1. Greenfield 69 kV Line - Transource
2. Greenfield Station - Transource

Cost elements covered by cost containment

Engineering & design	Yes
Permitting / routing / siting	Yes
ROW / land acquisition	Yes
Materials & equipment	Yes
Construction & commissioning	Yes
Construction management	Yes
Overheads & miscellaneous costs	Yes
Taxes	Yes
AFUDC	Yes
Escalation	Yes
Additional Information	Please see the cost commitment legal language upload document for further details. This cost containment legal language document is privileged and company confidential and redacted from public view due to company confidential information.
Is the proposer offering a binding cap on ROE?	Yes
Would this ROE cap apply to the determination of AFUDC?	Yes
Would the proposer seek to increase the proposed ROE if FERC finds that a higher ROE would not be unreasonable?	No
Engineering & design	Yes
Permitting / routing / siting	Yes
ROW / land acquisition	Yes
Materials & equipment	Yes
Construction & commissioning	Yes

Construction management	Yes
Overheads & miscellaneous costs	Yes
Taxes	Yes
AFUDC	Yes
Escalation	Yes
Additional Information	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.
Is the proposer offering a Debt to Equity Ratio cap?	The redacted content contains proprietary and company confidential information the Proposing Entity requests be held from public view.

Additional comments

PLEASE NOTE – due to a “timeout” issue during upload of large zip files (~38MB), the Proposing Entity split the large “Project analysis attachments” on the General Information page, Supporting Documents section, into two attachments per recommendation of PJM staff. File 1 of 2 is in the “Project analysis attachments” location, and File 2 of 2 is in the “Market efficiency simulation modeling files” location.