



STATEMENT

Statement of Commissioner Cheryl A. LaFleur on Order on Cost Allocation Report and Tariff Revisions

Date: January 18, 2018

Docket No.: ER17-1236-000,
ER17-1236-001
Item No.: E-19

"I concur with today's order accepting cost responsibility assignments submitted by PJM Interconnection, L.L.C. (PJM), including those for Baseline Upgrades b2758 and b2759, because I agree that these assignments comply with the cost allocation methodology currently on file. However, I write separately to note my partial dissent in *PJM Interconnection, L.L.C.*,¹ which accepted the PJM Transmission Owners' proposal to allocate 100 percent of the costs of transmission projects included in PJM's Regional Transmission Expansion Plan solely to address Form 715 local transmission owner planning criteria to the zone in which the criteria apply. As explained in that dissent, I believe the Commission should have retained regional cost allocation for transmission projects that are double-circuit 345 kilovolt (kV) and 500 kV and above. I further note that the Commission's orders² are currently on appeal before the United States Court of Appeals for the District of Columbia Circuit.

"Accordingly, I respectfully concur."

¹ 154 FERC ¶ 61,096 (2016) (LaFleur, Comm'r, dissenting).

² *Id.*, order on reh'g and clarification, 157 FERC ¶ 61,192 (2016).