

November 22, 2005

Magalie R. Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: PJM Interconnection, LLC
Docket No. EL05-121-000

Dear Secretary Salas,

Attached for filing in the above-referenced proceeding, please find an electronic copy of the Prepared Answering Testimony of Richard A. Galligan on behalf of Joint Consumer Advocates.

Sincerely,

/s/ filed electronically

Sandra Mattavous-Frye
Deputy People's Counsel
Lopa Parikh
Assistant People's Counsel
Office of the People's Counsel for the
District of Columbia

On behalf of the:
D.C. Office of the People's Counsel and
Maryland Office of the People's Counsel

Enclosure
cc: Official Service List

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

PJM Interconnection, LLC

)

Docket No. EL05-121-000

**SUMMARY OF PREPARED ANSWERING TESTIMONY
OF RICHARD A. GALLIGAN
ON BEHALF OF THE D.C. OFFICE OF THE PEOPLE'S COUNSEL
AND THE MARYLAND OFFICE OF THE PEOPLE'S COUNSEL**

Pursuant to the procedures established herein, the District of Columbia Office of the People's Counsel ("DC OPC") and the Maryland Office of the People's Counsel ("MPC") hereby respectfully submit this summary of the Prepared Answering Testimony of Richard A. Galligan ("Exhibit OPC-1") in response to Old Dominion Electric Cooperative's ("ODEC") recommendation for a single transmission rate for the three operating utilities of Pepco Holdings, Inc ("PHI").

Mr. Galligan explains that a combined rate is not justified at this time because there has not been sufficient time since the operating companies were combined under PHI for their combined transmission systems to resemble a transmission design resulting from coordinated planning. Mr. Galligan testifies that until the combined transmission systems begin to resemble a coordinated planning result, a single rate cannot be reasonably expected to be consistent with each individual operating company's costs of transmission service. Mr. Galligan also points to the separate operations of the PHI operating companies, and the lack of record evidence of any change to that policy after the merger which would result in coordinated transmission planning and operations. The PHI operating utilities operate as separate utilities with different transmission systems and needs. Adopting a single rate would be contrary to the needs of the

customers of each utility. Mr. Galligan also explains that recovering more transmission costs over a broader section of load will reduce cost discipline, which is essential to efficient utility operations.

Mr. Galligan concludes that the ODEC prescription for a single, holding company-wide rate is a recommendation to base rates on the happenstance and history of utility ownership without regard to the transmission costs incurred by each operating company.

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Summary and the accompanying Prepared Answering Testimony of Richard A. Galligan upon each person designated on the Official Service List compiled by the Secretary in this proceeding. Dated at Washington, D.C. this 22nd day of November, 2005.

/s/ filed electronically

Lopa Parikh
Assistant People's Counsel

On Behalf of:
D.C. Office of the People's Counsel and
Maryland Office of the People's Counsel