

Interconnection Process Overview

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Purpose of the Interconnection Process

- Facilitate interconnection of new generation by performing planning analyses and coordinating with the transmission owners to ensure system reliability and generation deliverability to all PJM load.
- Guide developers through the interconnection process on a timely basis while maintaining fair and equitable treatment between customers within the terms and conditions of the PJM Tariff.

 Provide the cost to physically connect the generator to the transmission system along with all necessary network upgrades.



Foundations of the Interconnection Process

Adherence to federal policy

Studies conducted consistent with annual RTEP studies

Generation deliverable to all PJM load

- Cost assigned to the causer
- All projects treated equally regardless of size, location or fuel



Process overview

Interim deliverability and rights

Recent trends

Recent changes

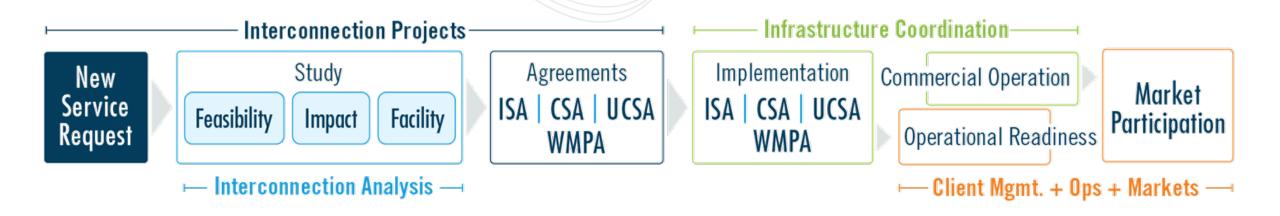
Other RTO processes



PJM Interconnection Process Overview



Process Diagram







Interconnection Projects

- Single point of contact for study phases
 - Interconnection customers
 - Transmission owner
 - Interconnection Analysis engineers
- Process facilitation and mediation
- Draft & review reports
- Draft service agreements

Interconnection Analysis

- Model and study all projects
 - Load flow, short circuit and stability analysis
- Test system upgrades from transmission owners
- Calculate cost responsibility
- Coordinate with neighboring RTOs

Infrastructure Coordination

- Single point of contact for construction phase
 - Interconnection customers
 - Transmission owner
 - Interconnection Analysis engineers
- Oversight of billing
- Coordination of model in operations systems and final testing



Submitting a New Service Request

Interconnection Projects

New Service Request







Implementation
ISA | CSA | UCSA
WMPA

Commercial Operation
Operational Readiness

Market Participation

← Client Mgmt. + Ops + Markets ←

OATT Attachment N, Y, BB, S, EE, PP*

- N Generation
- Y Generation (≤2 MW synchronous, ≤5 MW inverter-based, and energy-only)
- BB Generation (≤10 kW inverter-based & energy-only)
- S Merchant transmission
- EE Upgrade request
- PP Long-term firm

Required Information

- Location
- Project size
- Ownership (site control for interconnection requests)
- Equipment configuration
- Planned in-service date
- Deposit
- Queue point data

^{*} NOTE: Transmission service requests are received through OASIS and are then communicated to System Planning for inclusion in the New Services Queue with remainder of the New Service Requests.



Feasibility Study

Interconnection Projects

New Service Request



Agreements
ISA | CSA | UCSA
WMPA

— Infrastructure Coordination

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Commercial Operation

Operational Readiness

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Required

- Deposit for interconnection requests based on request receipt timing and MW size
- Site control for generation requests
- In-service date within 7 years of entering queue
- Customer can select a primary and secondary Point of Interconnection (POI)
- Study Completion: Target approximately
 120 days after close of queue
- Study participants: PJM & TO (Contractor under TO)

Results

- Attachment facilities needed for interconnection
- Powerflow Analysis Identify thermal overloads and required upgrades (costs and construction schedule estimates for primary POI)
- Powerflow Analysis Identify thermal overloads with secondary POI (no cost/schedule estimates)
- Short-Circuit Analysis
- Customers receive a Feasibility Study Report and have
 30 days to sign a System Impact Study Agreement (SISA)



System Impact Study

Interconnection Projects

New Service Request



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WMPA

Infrastructure Coordination

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Operational Readiness

Market Participation

← Client Mgmt. + Ops + Markets ←

Required

- Deposit based on MW size
- Initial Air Permit Application (N/A for solar/wind projects)
- Ownership (Transmission Interconnection Requests)
- Customer must select a single POI (if two were evaluated in the Feasibility Study)
- Study Completion: Target 120 days after start of queue study or execution of System Impact Study Agreement
- Study participants: PJM & TO (contractor under TO) and affected systems (FSA)

Results

- Summer-peak powerflow analysis
- Light-load powerflow analysis (if applicable)
- Short-circuit analysis
- Other Powerflow analyses as applicable
- Cost estimates and allocations
- Customers receive a System Impact Study Report and have 30 days to sign a Facility Study Agreement (FSA)



Facilities Study

Interconnection Projects

New Service Request



Agreements
ISA | CSA | UCSA | WMPA



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ISA | CSA | UCSA
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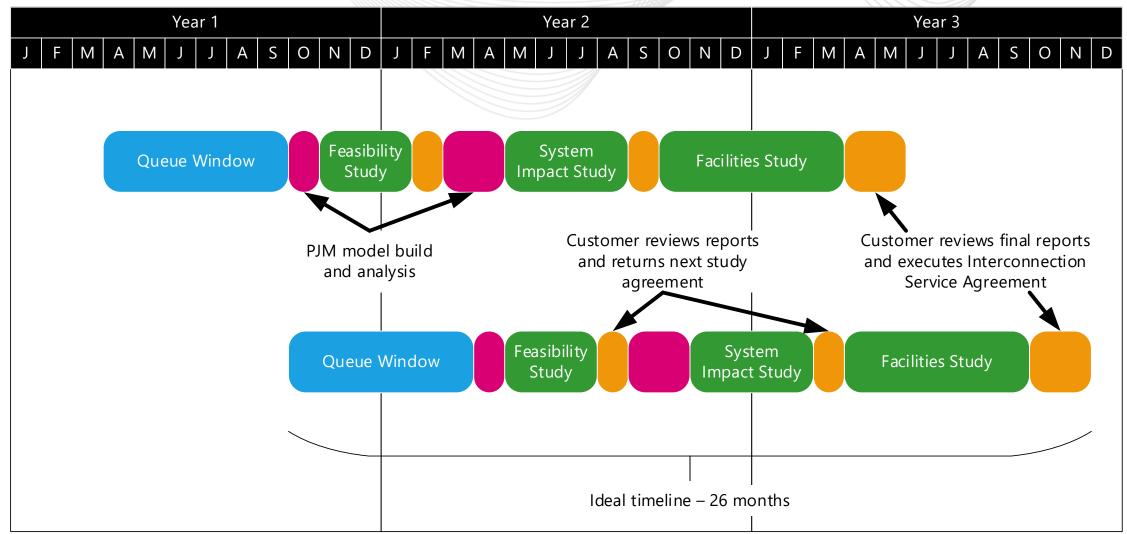
← Client Mgmt. + Ops + Markets ←

- Conduct governed by procedures as set forth in Attachment D of Manual M-14A
- Required
 - Deposit based on MW size
- Completion
 - Dependent on individual transmission owner zone and queue volume
- Study By
 - TO (or contractor under direction of TO)
 - Affected system study

- Potential for System Impact Study re-tool analysis
- Stability analysis
- Additional studies as required by type of technology being connected
- Facility Study Report: conceptual design
- Attachment facilities
- Network upgrades
 - Cost estimates
 - Preliminary engineering and construction schedule



Interconnection Process Timing





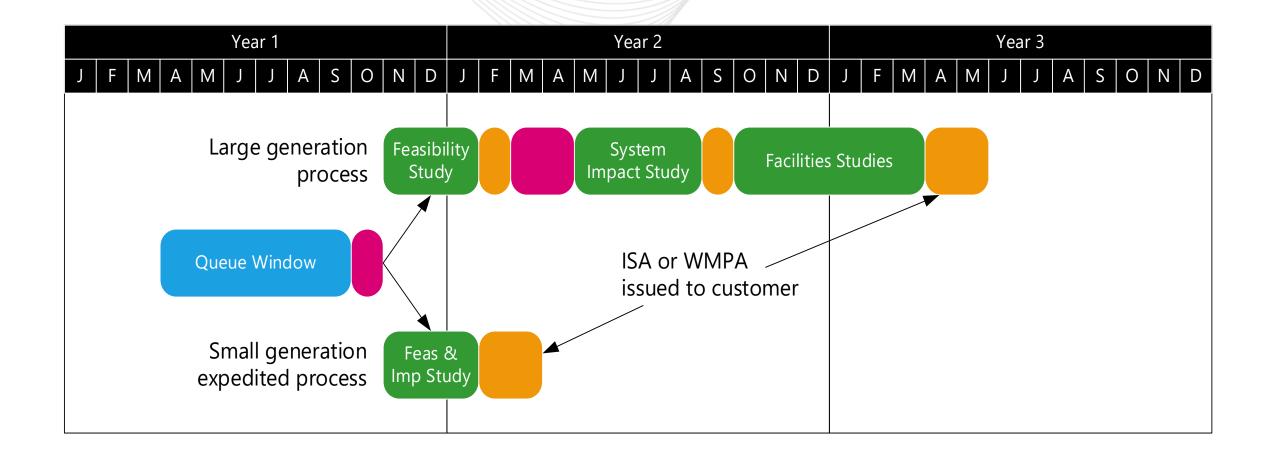
Small Generation Timeline (≤20 MW)

 Feasibility and System Impact Studies combined during the Feasibility Study window.

- Permitted when:
 - Project is 20 MW or less
 - Does not cause any transmission system violations
 - Does not request a Secondary Point of Interconnection



Small Generation Timeline (≤20 MW)





Interim Interconnection Service Agreement

Interim Interconnection Service Agreement

- Can be requested at any time prior to the issuance of an Interconnection
 Service Agreement
- Allows engineering and procurement to start while the project is under study
- Scope must be mutually agreed to by customer and transmission owner
- Does not allow a project to interconnect or grant any rights



Project Modifications: Tariff Section 36.2A

Material Modification: A change that has a material adverse impact/effect to any later subsequently queued project in relation to scope, cost or time.

- Changes that result in a Material Modification will not be accepted by PJM for current queue position held.
- A project may never increase the Maximum Facility Output (MFO) or Capacity Interconnection Rights (CIR) without an additional new service request.
- A change in fuel type would require a Material Modification review.
- Significant changes to POI are considered material. Project must be withdrawn, and a new interconnection request submitted for the modification. (Tariff Section 36.2A.3)



Permissible Technological Advancement: New Tariff Section 36.2A.22

A Technological Advancement submitted to PJM no later than the return of an executed Facilities Study Agreement (or return of an executed ISA if a Facilities Study is not required) is classified as a **Permissible Technological Advancement** if the proposed change does not:

- Increase the capability of the generating facility
- Represent a different fuel type
- Cause any material adverse impact(s) on the transmission system

If a proposed technological advancement is deemed a Permissible Technological Advancement, then the proposed change will <u>not</u> be considered a Material Modification, and no additional PJM study will be required. All other proposed technological changes will require a study to determine if the change would constitute a Material Modification.



Reduction Rules: Tariff Section 36.2A.1.1

Modification Prior to the Commencement of the Feasibility Study (Tariff Section 36.2A.1.1)

Interconnection customer may reduce its project by up to **60 percent** of the electrical output. Timing of the announcement depends on which month of the queue they entered:

- i. For projects that enter the queue in months 1–5, customer must identify the change prior to the close of business on the last day of the sixth month.
- ii. For projects that enter the queue in month 6, the customer must identify the change no later than close of business on the day following the completion of the scoping meeting.



Reduction Rules: Tariff Section 36.2A.1.2

Modification After the Start of the Feasibility Study but Prior to Executing a System Impact Study Agreement (Tariff Section 36.2A.1.2)

Interconnection customer may reduce its project by up to **15 percent** of the electrical output. For a request to reduce by more than 15 percent, customer must request PJM to determine whether such a change would be a Material Modification. PJM will allow the customer to reduce the size of its project:

- i. To any size if PJM determines the change is not a Material Modification, or
- ii. By up to **60 percent** of the electrical output if PJM determines it is material; however, in this case the project would be removed from its current position and be assigned a new queue position at the beginning of the subsequent queue, and your future studies will be performed consistent with the timing of studies for projects submitted in the subsequent queue.



Reduction Rules: Tariff Section 36.2A.2

Modifications After the System Impact Study Agreement but Prior to Executing an Interconnection Service Agreement (Tariff Section 36.2A. 2)

Interconnection customer may reduce its project by the greater of **10 MW or 5 percent** of the electrical output. For a request to reduce by more than this, customer must request PJM to determine whether such a change would be a Material Modification. PJM will allow the customer to reduce the size of its project:

- i. To any size if PJM determines the change is not a Material Modification, or
- ii. By up to the greater of **50 MW or 20 percent** of the electrical output if PJM determines it is material; however, in this case the project would be removed from its current position and be assigned a new queue position at the beginning of the subsequent queue, and a new **System Impact Study** will be performed consistent with the timing of studies for projects submitted in the subsequent queue.



Agreements

Interconnection Projects

New Service Request



Agreements ISA | CSA | UCSA WMPA Infrastructure Coordination

Implementation
ISA | CSA | UCSA
WMPA

Commercial Operation
Operational Readiness

Market Participation

├ Client Mgmt. + Ops + Markets →

Agreement Type	New Service Customer	FERC Jurisdictional ?		
Interconnection Service Agreements (ISA)	Generation/Transmission Interconnection Customer	Yes		
Wholesale Market Participation Agreements (WMPA)	Generation Interconnection Customer	No		
Interconnection Construction Service Agreement (CSA)	Generation/Transmission Interconnection Customer	Yes		
Upgrade Construction Service Agreement (UCSA)	Transmission Interconnection Customer (Merchant Network Upgrades)	Yes		



ISA and CSA Overview

Interconnection Service Agreement

- Grants rights to interconnect and generate
- Defines project milestones
- Describes the project's point of interconnection
- Describes system upgrades and costs
- Outlines metering requirements
- Security requirement
- Persists after construction

Construction Service Agreement

- Outlines construction responsibility
- Contains upgrade construction schedule
- Contains notification and insurance obligations
- Terminates after construction



Wholesale Market Participant Agreement

- Connects to distribution line
- No prior wholesale sales
- Requires customer to pursue a two-party Interconnection
 Agreement with TO
- Grants rights to participate in PJM's market
- Persists after construction



Agreement Implementation

Interconnection Projects

New Service Request



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PJM's Responsibilities:

- Periodic construction status meetings
- Outage coordination
- Billing and cost tracking for each network upgrade number

Metering and telemetry from IC to PJM

Infrastructure Coordination

- Test energy injection
- Project close out



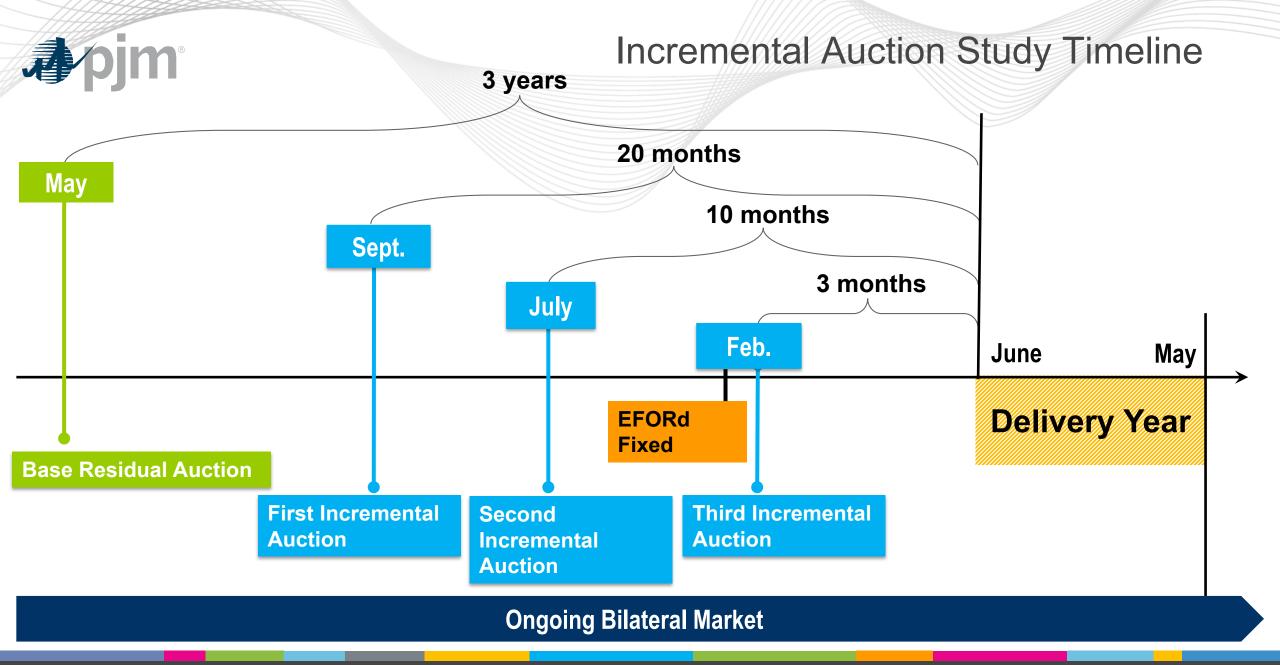
Interim Deliverability and Rights



Interim Deliverability Study is targeted toward:

- Projects coming into service prior to the study year
- Projects that are dependent on a network or baseline upgrade that expect the dependent reinforcement to be not completed at the time of the project coming online*

*Only facilities identified at constraints in the System Impact Study will be monitored



2nd IA 2021 3rd IA 1st IA 2021 2022

Example Schedule for 2020

2nd IA 2021 Study Begin: February 2020

Study End: June 2020

Auction Date: August 1st Week

Str

Study Begin: June 2020

Study End: August 2020

Auction Date: October 1st Week

1st IA 2022

Study Begin: September 2020

Study End: January 2021

Auction Date: March 1st Week

3rd IA 2021

*BRA studies are performed as needed





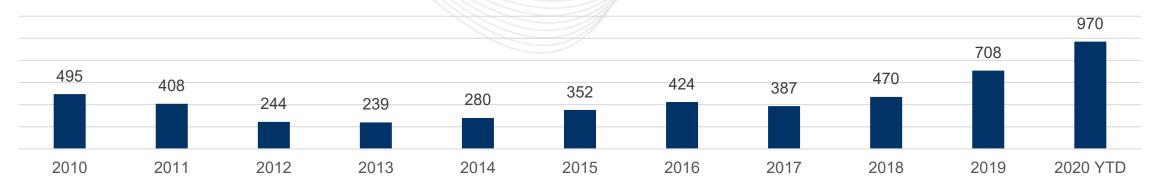
Recent Trends



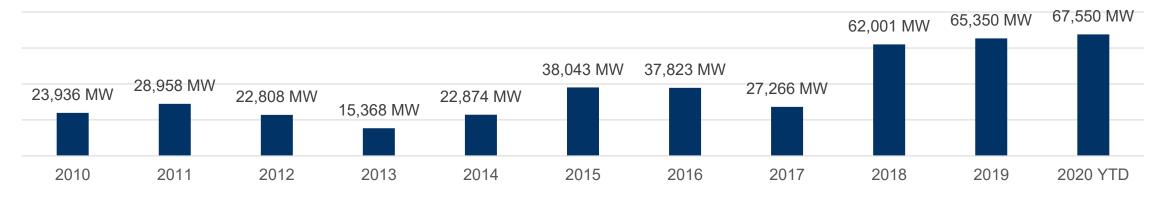
New Generation Requests

As of Oct. 20, 2020

New Requests Submitted to PJM



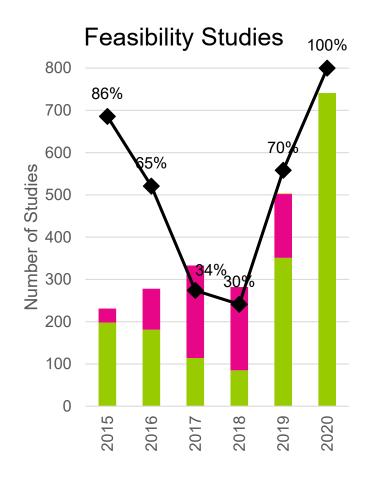
Proposed Generating Capability, MW

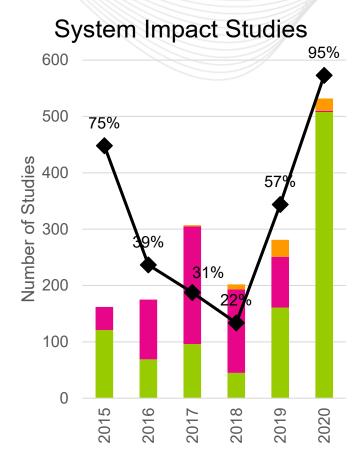


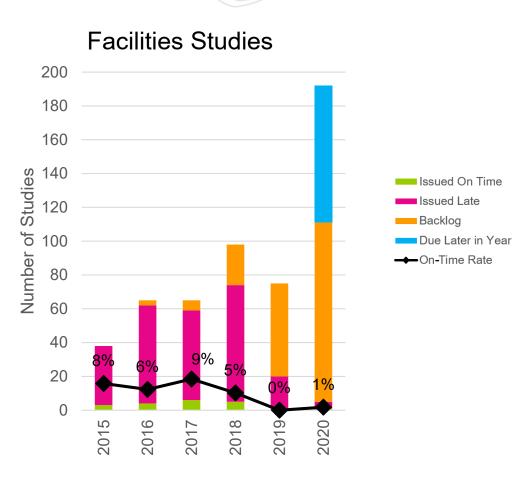


Study Volume and On-Time Rates

As of Oct. 20, 2020





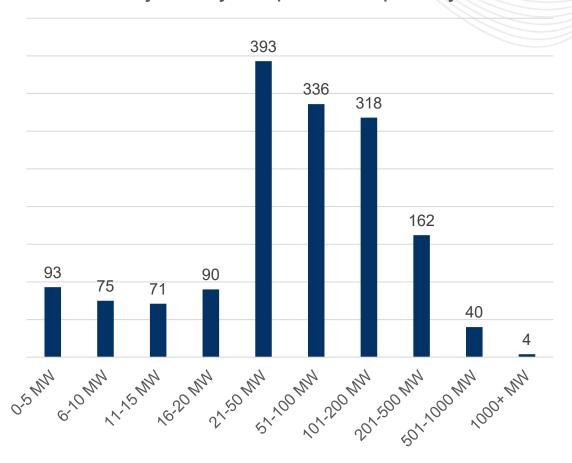


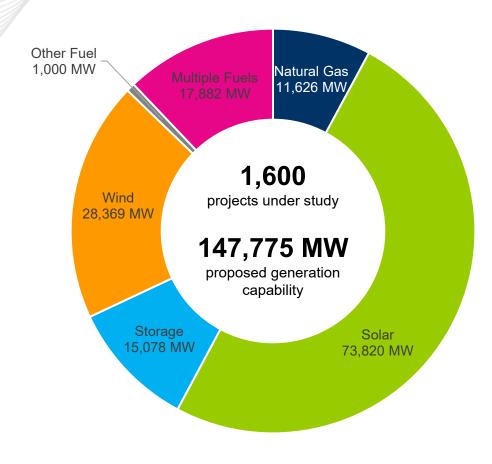


Current Interconnection Queue Volume

As of Oct. 20, 2020

Projects by Proposed Capability







Recent Changes



Recent Changes

Education / Transparency

- Order 845 metrics
- Pre-queue / Post-ISA training
- Improved manual language for site control

Flexibility

- Order 845 permissible technological advancement
- Deficiency cure changes

Process

- Streamlined small generation analysis
- Improved Attachment Y treatment
- Improved PJM tools for analysis and reporting
- 6-month schedule for TOs
- Delayed start of stability analysis

PJM Personnel

- Increased contractor support
- Realigned interconnection departments



Education and Transparency

Change	Realized Benefits
Order 845 performance metrics (<u>link</u>)	Standard method to compare the volume, performance rate and study duration for interconnection processes across the country
Pre-queue training (<u>link</u>)	Recorded training walking through the application process and Queue Point along with high-level overview of process
Improved manual language for site control	Increased clarity on requirements for site-control evidence



Change	Realized Benefits
Order 845 permissible technological advancement	Allows customers to change technology (turbines, inverters, etc.) without a Material Modification analysis
Deficiency cure changes	Customers have the opportunity to correct application deficiencies within 10 business days no matter when the request is submitted



Change	Realized Benefits
Streamlined small generation analysis	Improved internal processes to increase the number of small projects eligible for a combined Feasibility/System Impact Study
Updated Attachment Y treatment	Updated procedures to issue Attachment Y studies for requests on distribution lines within 90 days of submission of all required information
Improved PJM Tools for analysis and reporting	Improvements to TO analysis reports and standardized format of interconnection study reports
6-month schedule for TOs	Schedule shared with TOs to assist in work planning in advance of interconnection deadlines
Delayed start of stability analysis	Reduced scope for System Impact Studies to help issue studies on time



Change	Realized Benefits
Contractor support	Supplementing PJM staff with contractors to perform study work, draft reports and manage projects
Department realignment	Creation of geographic teams to improve focus and communication with TOs and customers



Continued Challenges

- Large volume of projects leading to large volume of violations and upgrades
 - Total queued generation just below installed capability
 - Pockets of high density of proposed generation requests
 - Lower-voltage system infrastructure not designed to deliver high quantities of energy
- Timeline to complete Facilities Studies
 - Large scope from network upgrades
- Duration to complete study process versus timeline to construct facilities
- Timelines with Affected System Studies



RTO Comparison



- Analysis of the transmission system and upgrades to ensure deliverability to all RTO load
- Planning criteria focuses on reliability not economics
- Planning criteria more conservative than NERC standards
- Cost for upgrades not reimbursed by load
- No obligation for ongoing transmission service



RTO Benchmarks

As of Oct. 20, 2020

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	РЈМ	CAISO	ERCOT	ISO-NE	MISO	NYISO	SPP	
RTO statistics								
Peak load, MW	165,492	50,116	74,850	25,000	127,125	33,956	50,662	
Installed capability, MW	180,086	51,765	78,000	31,000	175,000	40,191	90,466	
NERC Planning Authority	Yes	Yes		Yes	Yes	Yes	Yes	
NERC Transmission Planner	Yes	No		Yes	No	Yes	Yes	
Interconnection queue								
Active projects	1,600	231	633	149	693	346	790	
Proposed generation, MW	147,775	67,335	126,464	38,390	105,453	47,737	135,535	



RTO Benchmarks

As of Oct. 20, 2020

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	РЈМ	CAISO	ERCOT	ISO-NE	MISO	NYISO	SPP	
Ratios								
Queued generation / peak load	89%	134%	169%	154%	83%	141%	268%	
Queued generation / installed	82%	130%	162%	124%	60%	119%	150%	
Order 845 Metrics (aggregated) January–June 2020			N/A					
Total studies issued (A)	650	101		17	526	34	0	
Total studies issued late (B)	62	101		11	256	32	0	
Backlogged studies (C)	198	0		0	429	14	0	
Aggregate performance rate (B+C)/(A+C)	30.7%	0%		64.7%	71.7%	95.8%		

Performance rate measures late studies and backlogged studies. Any study phase with a rate greater than 25 percent for two consecutive reporting periods require a detailed filing to FERC explaining causes and corrective actions.



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Interconnection Process Overview



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