

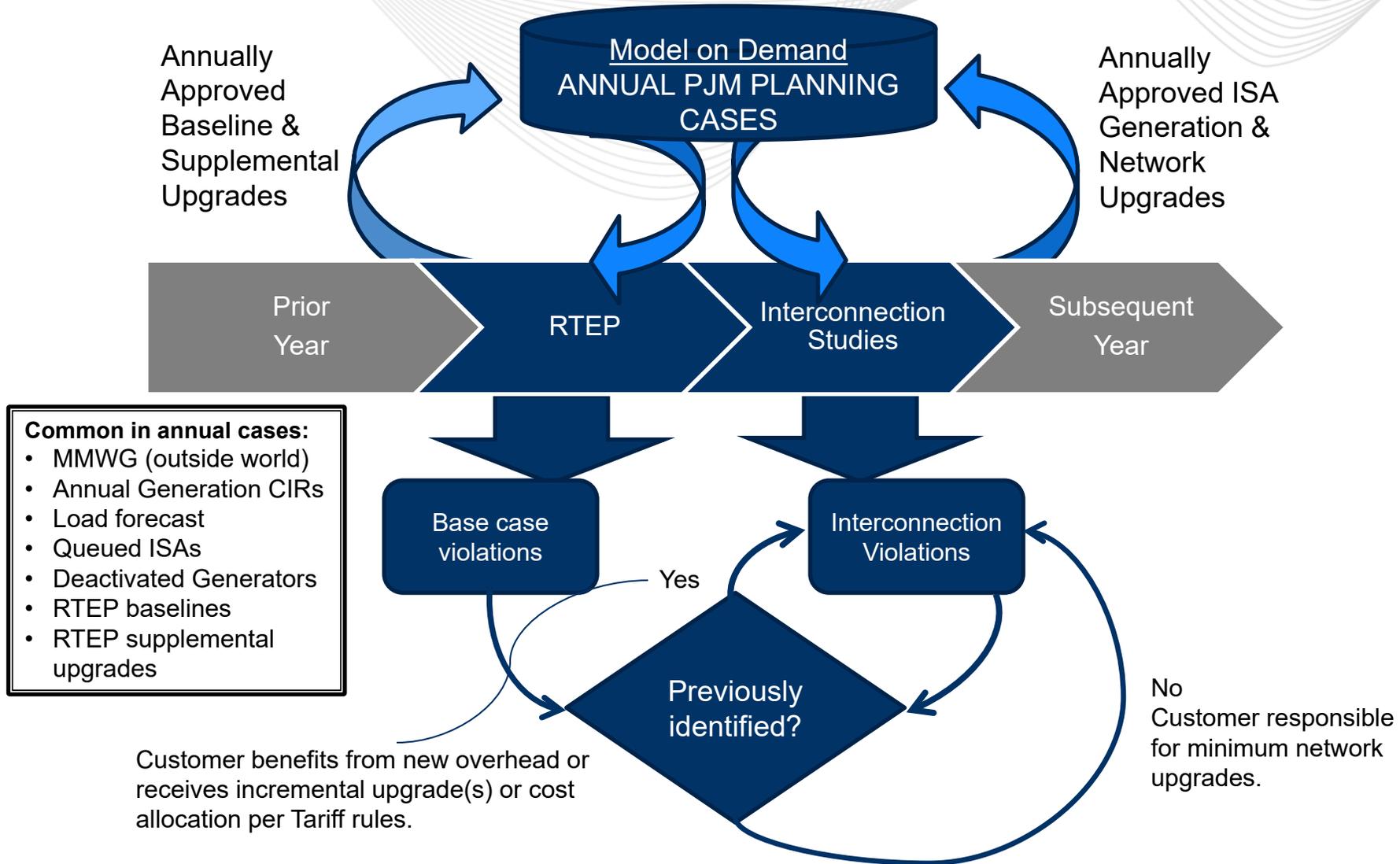


# Advanced Notice of Proposed Rulemaking: Issues for Review

Dave Souder, Exec. Dir., System Planning  
Interconnection Policy Workshop – Session 4  
August 27, 2021

- Seek public comment on the following topics:
  - Reforms for longer-term regional transmission planning and cost allocation processes that account for a more holistic approach to planning, including planning for anticipated future generation;
  - Interconnection queue processes;
  - Rethinking cost responsibility for regional transmission facilities and interconnection-related network upgrades; and
  - Enhanced oversight of transmission infrastructure development.
- FERC has not predetermined that any specific proposal discussed shall or should be made ~ or in what final form

- **Existing Planning Process is not Siloed**
  - Existing processes developed to honor cost causation principles
  - RTEP and Interconnection Queue processes are integrated
  - Feedback loops ensure accuracy of cases and identification of overlap
- **Need to build for new resources that may be located far from load centers not fully supported**
  - Understand trend toward roof-top solar, OSW
- **Merit/Risk of building transmission for generation not in Interconnection Queue**
  - Transmission facilities may not currently be planned and built in advance to meet the needs of anticipated future generation and as a result, interconnection customers are assigned the costs to construct large, high-voltage transmission facilities
  - Ensure transmission is built only to satisfy expected transmission needs and not overly speculative commercial interests - Commercial Probability Statistics
- **Resilience / Reliability Discussion missing or incomplete**



- Need for enhanced Interregional Coordination or Planning?
  - Examine Economic Transfer Capabilities
- Need for minimum requirements regarding future long-term scenarios for regional planning, including modeling anticipated future generation in those scenarios?
  - Commission should provide clear guidance as to future drivers for new transmission to provide PJM with authority to order new projects consistent with any new drivers
- Need for changes to Cost Allocation to include identification of new benefits?
- Need for additional Transmission Oversight?



## Presenter:

Dave Souder, Exec. Dir., System Planning

[David.Souder@pjm.com](mailto:David.Souder@pjm.com)

# ANOPR

## Member Hotline

(610) 666 – 8980

(866) 400 – 8980

[custsvc@pjm.com](mailto:custsvc@pjm.com)