

# Fast Lane Timeline & Readiness Window Requirements

August 2023 IPS

Michelle Farhat Engineer Interconnection Planning Projects

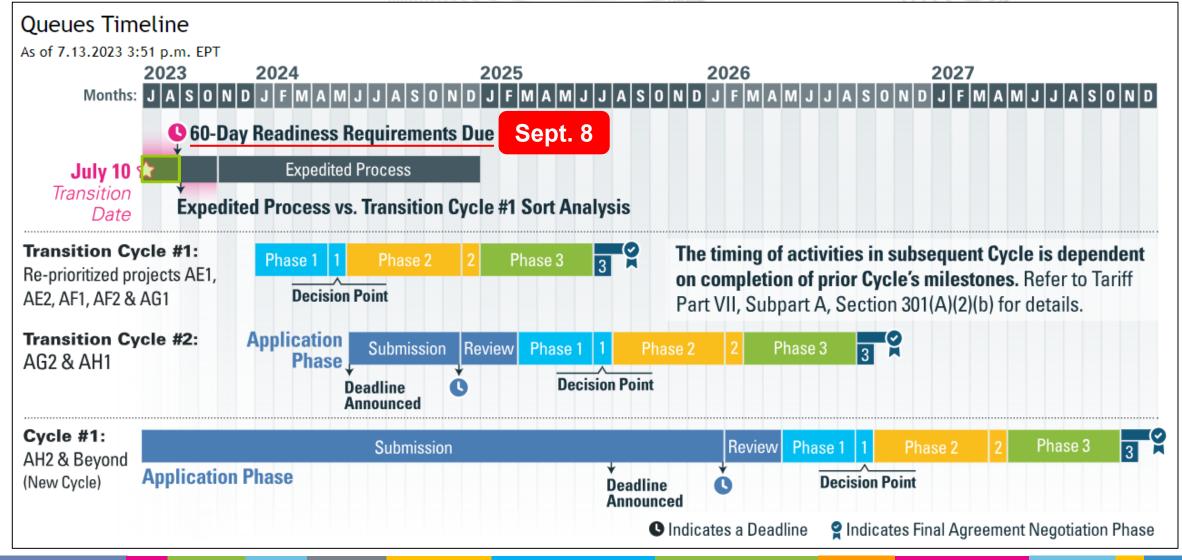
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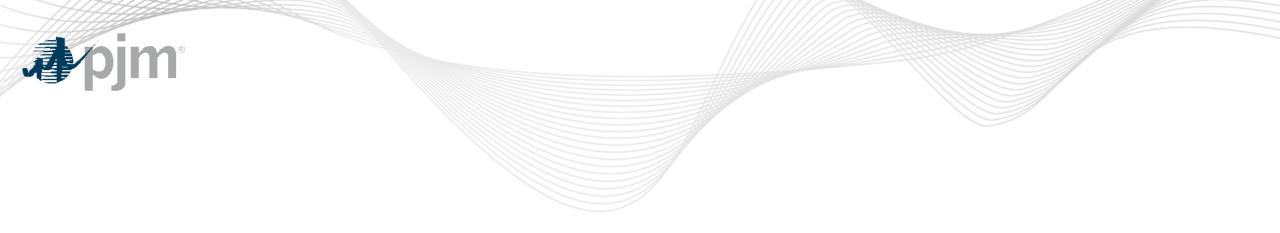
# **Timeline Recap**



## **Transition Timeline**



will post	ing active AE1-AG1 projects readiness requirements.		<ul> <li>Refreshed Fast Lane An</li> <li>Transition Cycle #1 prostudy cases.</li> <li>Fast lane projects will b</li> </ul>	jects will be removed from fast lane e re-analyzed without Transition Cyc
	ols during this time. Aug. 2023	Developers Notified of Fast Lane Eligibility Sept.–Oct. 2023	• •	will be updated. Refreshed analysis nort circuit and stability studies. Jan.–Apr. 2024
Transition Start	<ul> <li>Expedited Processing E</li> <li>AE1-AG1 projects that "Expedited Processing Transition Cycle #1.</li> </ul>	Eligibility Analysis have met readiness requiremen Eligibility Analysis" to sort project alyzed for load flow impacts on t	ets into fast lane and	Transition Cycle #1 Analysis Transition Cycle #1 projects will be re-queued into new priority and re-analyzed on new study case.



# **Transition Readiness Submissions**



# **Transition Readiness Information**

Service Requests	Home 🕨 Planning 🕨 Service Requests 🕨 Interconnection Process Reform	]
Services Request Status		
Interconnection Process	Interconnection Process Reform	
Reform	On Nov. 29, FERC issued an order conditionally approving PJM's interconnection process reform filing, subject to two compliance	
Application & Forms	filings, one of which has already been submitted by PJM. The filing constituted a comprehensive reform of the PJM interconnectio process, designed to more efficiently and timely process New Service Requests by transitioning from a serial "first-come, first-	
Planning Modeling Submissions (MOD-026,	served" queue approach to a "first-ready, first-served" cycle approach. The interconnection reforms are set forth in FERC Docket No. ER22-2110.	
027 & 032)	Pursuant to the Commission's order, PJM's new Tariff Parts VII and IX have an Effective Date of Jan. 3, 2023; these Tariff provisions	
Generation Deactivations	have already been merged into PJM's Tariff. However, the Jan. 3, 2023, Effective Date is different from the interconnection reform established Transition Date. As set forth in the new Tariff, Part VII, Definitions, the Transition Date is the later of: (i) the effective	
Project Status & Cost 🛛 🗸 Allocation	date of Transmission Provider's Docket No. ER22-2110 transition cycle filing seeking FERC acceptance of this Tariff Part VII (i.e., Jan. 3, 2023) or (ii) the date by which all AD2 and prior queue window Interconnection Service Agreements (ISAs) or wholesale market participation agreements (WMPAs) have been executed of filed unexecuted.	
Competitive Planning Process	The Transition Date will be July 10, 2023. As set forth in PJM Tariff, Part VII, within 60 calendar days after the Transition Date, vali AE1-AG1 projects, other than Upgrade Requests, that have not either executed or received for execution a final Interconnection	id
RTEP Development	Service Agreement or Wholesale Market Participation Agreement as of the Transition Date will have to demonstrate readiness	
Resource Adequacy 🗸 🗸	pursuant to Tariff, Part VII, Subpart B, section 303, in order to move forward in the interconnection transition process.	Educa
	e Transition Readiness Checklist PDF for a summary of these requirements and the Transition Readiness Education Video	Vide

**Readiness** 

**Checklist** 



# Letters of Credit (LoC)

- PJM requested drafts by August 9 but developers should still send their drafts if they have not done so yet
- 477 draft LOC requests received\*
  - 286 accepted and results communicated to developers\*
  - 191 issues identified, communicated to developers and awaiting revisions\*
- Developers will only have five days to address LOC issues once final Readiness submission is reviewed
- We have returned comments for all initial draft LOCs within approximately 48 hours of receiving the request

\*as of 8/23/23



# Letters of Credit – Common Issues

Issue	Ask
Changes are made to the template without redlines	Ensure all changes are redlined so they can be easily identified and reviewed
Changes are made outside of the three acceptable provisions	Use the posted template. Only edit the three provisions as outlined in the template instructions
Sending a signed original LOC without first submitting a draft for review	You <u>must</u> submit a draft and it needs to be approved before you submit your final signed version
Additional changes are made from what is submitted from the approved draft	For your draft, submit the actual letter you will issue with all of the project information inserted but not signed yet. Do not make changes to content, format or template once the draft is approved



# Letters of Credit – Common Issues

Issue	Ask
Applicant name does not match our database	Ensure names match down to commas and spaces. Check Queue Point or transfer letter for reference
Signed original letters of credit are mailed to Credit	Mail to the attention of Interconnection Projects, as detailed in the LOC FAQ
Developer needs to upload more than document but Queue Point only allows one upload per project	Upload a zip file with individual pdfs for each and every document



# Acceptable Letter of Credit Provisions

Provision	Common Edits
<ul> <li>Pennsylvania law applies to all matters</li></ul>	<ul> <li>New York law when Issuing bank based</li></ul>
not covered by ISP98	in New York
<ul> <li>Presentation of payment demand reflecting Issuer's communication procedures without changing effectiveness</li> </ul>	<ul> <li>Including email address and fax number of Issuing bank</li> </ul>
<ul> <li>Sanctions, anti-boycott, antiterrorism, or</li></ul>	<ul> <li>Standard alternative language of Issuing</li></ul>
anti-money laundering language	bank may be acceptable

See the posted LOC template instructions for more details



# **Unacceptable Letter of Credit Provisions**

Provision	Common Edit	Reason Rejected
Automatic renewal language	<ul> <li>Deletion or replacement with final expiration date</li> </ul>	<ul> <li>Violates Attachment Q</li> </ul>
Issuer credit rating requirement	Deletion or modification	<ul> <li>Violates Attachment Q</li> </ul>
Presentment of payment demand	<ul> <li>Requires phone call as condition to the effectiveness of presentment</li> </ul>	Outside of PJM's sole control
<ul> <li>Changes in payment terms from one to two business days</li> </ul>	<ul> <li>Three or more business days</li> </ul>	<ul> <li>Maintain consistency across letters of credit which supports equal treatment of PJM counterparties and minimizes risk of inconsistent documents</li> </ul>

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# Letters of Credit – Resources

### Application & Forms page on pjm.com

- Readiness Deposit Letter of Credit Form
- Letter of Credit FAQs

### List of acceptable financial institutions

For questions about acceptable financial institutions, email <u>credit\_hotline@pjm.com</u>

Email drafts to <u>SystemPlanning.Admin@pjm.com</u> prior to final submission Consent to Assignment Agreement Templates

Project Assignment	PJM Contact	Consent Documents
rior to nterconnection ervice Agreement, Vholesale Market larticipant ugreement or lpgrade ionstruction Service ugreement xecution	Interconnection projects project manager	For Queue Projects: Combined Buyer-Seller DOC Seller DOC Buyer DOC For Cycle Projects: Combined Buyer-Seller DOC Seller DOC Buyer DOC
After ISA and prior to commercial operation (i.e. during construction)	Infrastructure coordination project manager	Assignment to: Lenders DOC Other Than Lenders: IC   TO DOC Agreement to Amend per Assignment without Prior Consent Template DOC Consent to

Assignment and

Agreement to

From Application & Forms page on pim.com

Transmission Owner/Generation Owner Phasor Device Registry Form XLS Transmission Owner Notice of Completion of Construction -Template DOC Wholesale Market Participant Agreement Construction Information PDF Confirming Letter of Credit for Interconnection Agreements - Version 2 - Effective 4.2.2021 DOC

#### Letters of Credit & FAQs

Readiness Deposit Letter of Credit DOC Letter of Credit - ISA DOC Letter of Credit FAQs PDF Issuing Financial Institutions (PDF)

#### Stakeholder Groups

Transmission Expansion Advisory Committee

#### Notice of Intent to Transfer CIRs

Notice of Intent to Transfer CIRs DOC

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  - Developers whose LoC drafts are not approved one week before the end of the readiness window (by Sept. 1) should prepare to submit their readiness deposit via wire
  - Wires must be in PJM's account by COB Sept. 8, <u>not</u> sent from the bank on Sept. 8
  - We prefer 1 wire per project for ease of processing.
    - If you need to send 1 wire that covers multiple projects please contact <u>SystemPlanning.Admin@pjm.com</u> with details on the project breakdown.





- Wires must specify the Project Identifier Number
- The wire confirmation number must be entered in Queue Point
- For wire information, email <u>SystemPlanning.Admin@pjm.com</u>



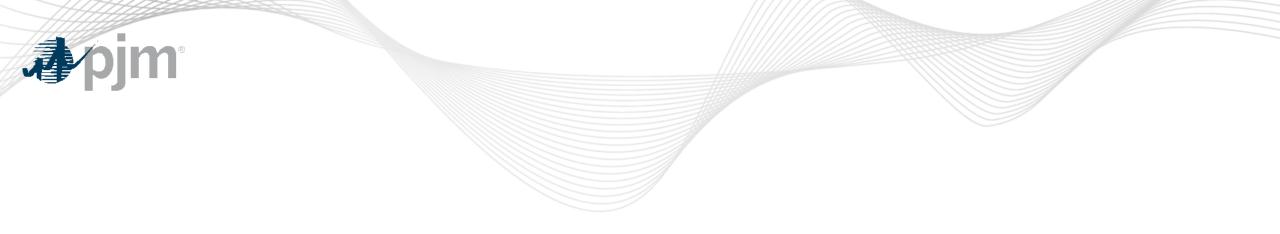
- Entity name must exactly match what is in Queue Point or latest transfer letter
- If Site Control is held by a different entity from the developer you can submit one of the following to establish Site Control:
  - Assignment document from the developer to the entity. This will result in a change of ownership of the project
  - Operating agreement between the entity and the developer
  - A document showing the corporate structure relating the entity and the developer

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# Site Control – Land Owner Attestation

- This is not necessary unless your project manager requests it
- If requested, your project manager will send you the form

-	
Upload Executed Letter of Credit *	+ Choose File
Readiness Deposit Comments	
Site Control	
Identification of Ownership Interest *	+ Choose File
Land Owner Attestation	+ Choose File
Officer Certification Form	+ Choose File
Site plan	+ Choose File
Site Control Comments	



# Next Steps

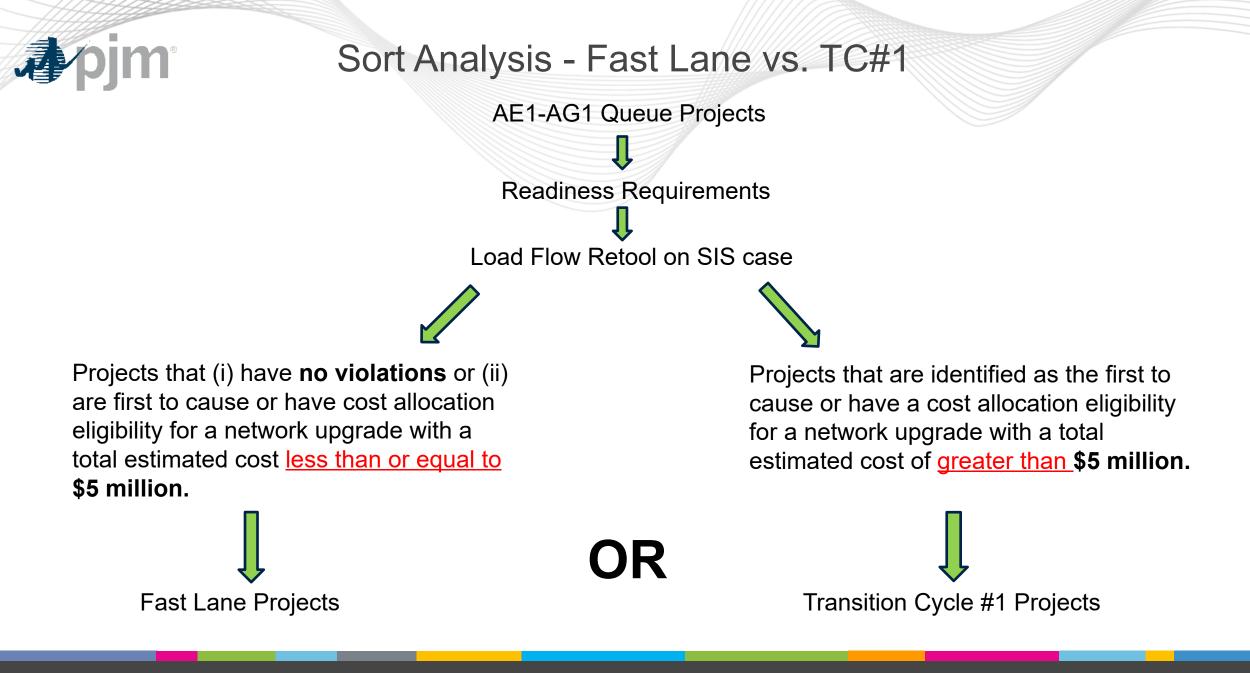


# Fast Lane Requirements for GIA

- Projects that meet the following requirements will begin GIA/WMPA drafting
  - Analysis complete for LF/SC/Stability with no upstream queue dependencies
    - PJM analysis confirms project is clean or first to cause locked
      - Project results cannot be impacted by other project decisions or movement to Transition Cycle #1
  - Facilities Study complete from TO
  - Readiness Deposit and Site Control provided by developer, and reviewed and accepted by PJM
  - Developer GIA/WMPA inputs received
- We are identifying projects that are close to ready based on this criteria. Once Readiness requirements are confirmed, we will start drafting GIAs



- We are preparing for reviews! We anticipate starting readiness verifications on Sept. 9
- If there are questions about a submission, we will communicate them to the developer. The developer will have five business days to address the questions
- If a submission meets all requirements, it will be accepted
- We will provide an update on the status of reviews at the next IPS meeting on Sept. 27
- Once readiness requirements are met, accepted projects will be entered into the first retool pool. The retool will determine Fast Lane/TC#1





# Preparing for the Fast Lane

- Once the first retool is complete, we will start working on Fast Lane final agreements.
- We are currently coordinating with Transmission Owners to work towards updating and completing Facilities Study Reports
- We are taking steps to streamline the GIA process
  - Developing internal plan to meet the needs of processing the large volume of projects
  - Developing tools and templates to facilitate drafting agreements and study reports
- Per our filing, we anticipate completing the Fast Lane by the end of 2024





# Michelle Farhat, Engineer, Interconnection Planning Projects

Michelle.Farhat@pjm.com

Member Hotline (610) 666 – 8980 (866) 400 – 8980 custsvc@pjm.com