



955 Jefferson Ave.
Valley Forge Corporate Center
Norristown, PA 19403-2497

Via E-mail

February 2, 2012

Scott Lewis
Green Energy Partners, LLC
31 Fairview Hill Road
Newton, NJ 07860

Dear Mr. Zecca:

Re: X3-083 – Andover – Feasibility Study Report and System Impact Study Agreement

Attached is a report documenting the results of the X3-083 Feasibility Study. The intent of the Feasibility Study is to determine a plan, with preliminary cost estimates to connect the subject project to the PJM network at a location specified by the Interconnection Customer. The results of this Feasibility Study are predicated on a year 2015 transmission system based upon PJM's best assumptions at the present time for load growth and connection of proposed new generation additions. The project was evaluated for system normal conditions and single contingency outage conditions.

Feasibility Studies are performed to provide an Interconnection Customer with preliminarily estimated reinforcement costs and information concerning both direct connection facilities and potential transmission network upgrades. Since the analysis inherently has to include assumptions for future system conditions, the results should be used in this context. More comprehensive estimates will be developed upon execution of a System Impact Study Agreement in accordance with Part VI of the PJM Tariff.

As a requirement for interconnection, the Interconnection Customer may be responsible for the cost of constructing: (1) Attachment Facilities, which are new facilities and/or facilities upgrades needed to connect the project to the PJM network, and (2) Network Upgrades, which are facility additions, or upgrades to existing facilities, that are needed to maintain the reliability of the PJM system. In some instances a project may not be responsible for 100% of the identified network upgrade cost because other transmission network uses, e.g., another interconnection project, may also contribute to the need for the same network reinforcement. The possibility of sharing the reinforcement costs with other projects may be identified in the Feasibility Study, but the actual allocation will be deferred until the System Impact Study is performed.

The Feasibility Study estimates do not include the feasibility, cost, or time required to obtain property rights and permits for construction of the required facilities. The project developer is responsible for the right of way, real estate, and construction permit issues. Note that Tariff §212.5 milestones require that you have all site permits, water and fuel agreements and associated right of way, and a memorandum of understanding for major equipment at the time you return your executed Interconnection Service Agreement (ISA). It is your responsibility to ensure these requirements are met and if they cannot be met at the time of the return of the ISA, you must demonstrate your due diligence and propose dates when those milestones will be met.

In addition, the Feasibility Study estimates do not include any the costs associated with engineering and constructing the equipment and facilities on the developer's side of the point of interconnection. These costs are the responsibility of the project developer.

The costs associated with the Feasibility Study are being tabulated and you will receive a statement / invoice electronically from PJM identifying your balance.

Pursuant to Section 204.3 of the PJM Tariff, enclosed is a copy of a System Impact Study Agreement for your consideration. The necessary deposit and executed agreement must be in the possession of PJM within thirty days (by close of business on **March 5, 2012**) to maintain the project's position in the queue. In addition, your project's electrical data sheet must be completed and submitted electronically by the above date for the Impact Study Agreement to be considered complete. The data sheet is located here: <http://www.pjm.com/planning/rtep-development/expansion-plan-process/form-impact-study-data.aspx>. Failure to submit this data by the due date will result in the withdrawal of your project. Please print, sign two copies of the agreement's signature page and return both with one copy of the agreement to PJM. Required with the signed agreement, per Section 3 of the enclosed System Impact Study Agreement is a non-refundable deposit of **\$10,000**. Please send the agreement, signed signature pages and check to:

Jeannette Mittan
PJM Interconnection, LLC
Valley Forge Corporate Center
955 Jefferson Avenue
Norristown, PA 19403

If you prefer, you may provide a wire transfer instead of a check. Send it as follows:

Bank: PNC Bank, NA, New Jersey
ABA Number: 031-207-607
Account Number: 8013589826

Please e-mail Jeannette Mittan at mittaj@pjm.com with the project name, queue number, date and amount of wire.

In addition to the executed System Impact Study Agreement and deposit, you are responsible to ensure that all queue requests that you may have in the PJM queue are in good financial standing and that you meet the requirements of Tariff §204.3. Failure to meet the requirements of Tariff §204.3 or have your accounts in good standing will result in your project to be withdrawn from the queue. It is your responsibility to meet these requirements.

If you wish to discuss the results of the study report or agreement with me, please let me know. My office telephone number is 610-666-4573 and my email address is mcgils@pjm.com.

Sincerely,



Susan L. McGill
Sr. Engineer
PJM Interconnection Projects

slm\jm DMS#681371v1
Attachments

PJM (w/attachments): Dave Cardy – FE
 Jon Cavalier – FE
 Valerie Davin – FE
 Laura Good – FE
 Amy Petrillo – FE
 Dave Reynolds – FE
 Mike Schock – FE
 Beth Snyder – FE
 Joyce Tamer – FE
 Mike Thorn – FE
 Susan Winger – FE

 Jeff Falciani – PJM
 File

***Generation Interconnection
Feasibility Study Report***

For

***PJM Generation Interconnection Request
Queue Position X3-083***

Andover

February 2012

Preface

The intent of the feasibility study is to determine a plan, with ballpark cost and construction time estimates, to connect the subject generation to the PJM network at a location specified by the Interconnection Customer. The Interconnection Customer may request the interconnection of generation as a capacity resource or as an energy-only resource. As a requirement for interconnection, the Interconnection Customer may be responsible for the cost of constructing: (1) Direct Connections, which are new facilities and/or facilities upgrades needed to connect the generator to the PJM network, and (2) Network Upgrades, which are facility additions, or upgrades to existing facilities, that are needed to maintain the reliability of the PJM system.

In some instances a generator interconnection may not be responsible for 100% of the identified network upgrade cost because other transmission network uses, e.g. another generation interconnection, may also contribute to the need for the same network reinforcement. The possibility of sharing the reinforcement costs with other projects may be identified in the feasibility study, but the actual allocation will be deferred until the impact study is performed.

The Feasibility Study estimates do not include the feasibility, cost, or time required to obtain property rights and permits for construction of the required facilities. The project developer is responsible for the right of way, real estate, and construction permit issues. For properties currently owned by Transmission Owners, the costs may be included in the study.

General

Green Energy Partners, LLC, the Interconnection Customer (IC), has proposed a solar generating facility located at 83 Brighton Road in Andover, New Jersey. The installed facilities will have a total capability of 10.0 MW with 3.8 MW of this output being recognized by PJM as capacity. This means that the remaining 6.2 MW will be curtailable should a system reliability constraint occur.

Point of Interconnection

X3-083 will interconnect with the Jersey Central Power & Light system at the 34kV line E707 between the Andover and Kittatinny substations.

FirstEnergy Analysis

As defined by the Interconnection Customer and shown on Attachment 2, the connection point for the X3-083 Project will be from a tap of the Kittatinny – Andover (E707-2) section of the Kittatinny – Newton (E707) 34.5 kV line at or near pole NJ150GR-707 that is about 1.7 miles west of the Andover substation. From this pole Jersey Central will construct a new 34.5 kV line extension that will be overbuilt on an existing 4.8 kV Distribution circuit right-of-way about 1.1 miles northeast to a point at or near pole NJ165AT adjacent to the X3-083 Project site. Jersey Central will then extend a one span radial line extension (about 200 foot) to a pole structure to be owned and maintained by the Interconnection Customer. The Interconnection Customer will construct a further 34.5 kV line extension to its project substation. Since Jersey Central will own, operate and maintain this new radial attachment line, the contractual point of interconnection will be at the first customer owned pole beyond pole NJ165AT as identified on Attachment 3. The Interconnection Customer will construct, own, operate and maintain the extension from the point of interconnection to its collector substation.

In summary, Attachment 3 shows a conceptual one-line diagram of the Direct Connection facilities that will be required for the X3-083 Project. As indicated, it will be studied as a 10 MW injection into the Jersey Central 34.5 kV system at pole NJ150GR-707 of the Kittatinny – Newton (E707) 34.5 kV line. A SCADA controlled disconnect switch will be needed on the radial tap pole as well as SCADA controlled disconnect switches on poles NJ149GR-707 and NJ151GR-707 in addition to a circuit breaker and switch on the system side of the generator step-up transformer. The Interconnection Customer will be responsible for acquiring all permits that may be required for the 34.5 kV tap, the new poles, and the radial line extension. The Interconnection Customer will also be responsible for acquiring all permits and constructing, owning and operating all facilities on its side of the point of interconnection. A summary of the FE facilities required for the X3-083 Project Direct Connection and their cost estimate is shown on Attachment 4.

Power Flow Analysis

A Power Flow study was conducted to determine the reliability impact of the proposed X3-083 Project on the FE Transmission System. This study was completed using a 2013 summer peak and light load power flow that contain a detailed representation of the Jersey Central transmission networks in the area of the proposed X3-083 Project. Note that the year 2013 was chosen for study rather than 2015 since this is the first summer period when the X Queue solar projects are scheduled for service. The findings and the recommendations from this analysis are based on a contingency review that was performed to identify the facility loadings and/or voltage conditions that violate the Reliability *First*, PJM or FE Planning Criteria and are attributable to this project.

The results of the FE analysis show that a network upgrade is required for the Capacity deliverability of the X3-083 Project generation to the Jersey Central transmission systems. Specifically as shown in Attachment 5, the FE study results show that with the twenty-one solar projects at their Capacity output the Newton - Mohawk (Z702) 34.5 kV line section could load up to 122.9% of its emergency rating of 27 MVA upon loss of the Newton - Montville (N2214) 230 kV line. Because this criteria violation is pre-existing, the X3-083 Project does not have a financial responsibility for reinforcing this line. FE will assume all cost responsibility for the

upgrade of this line section and plans to reconductor this limiting section by the end of 2013. However, the X3-083 Project could be constrained if it is installed before the Newton - Mohawk (Z702) 34.5 kV line reconductor project is complete.

In addition, there is the potential for high voltage during light load periods and voltage criteria violations due to swings in the MW output of the cumulative attached solar generation. A conclusion of this analysis is therefore that a curtailment of the X3-083 Project output to its PJM capacity value can be expected at times to maintain the Jersey Central system reliability within the NERC, Regional and FE operations and planning standards if all proposed RTEP Projects proceed.

Note that a further conclusion of this study is that it will be mandatory for the X3-083 Project to have a range of dynamic reactive capability that supports its operation from a .95 lead to .95 lag power factor. Without a continuous regulation, the FE studies show that the addition of solar projects can cause voltage swings as their output oscillates with moving clouds and system voltages that can exceed the established limits. Should the Interconnection Customer fail to provide a dynamic reactive capability from the X3-083 Project for any reason once interconnected, the Jersey Central and/or PJM Dispatchers may need to take action to curtail both the energy and capacity portion of its output to prevent a non-compliance with voltage criteria.

Short Circuit and Dynamics Analysis

In accordance with the RTEP process, a short circuit analysis will not be conducted by PJM since the X3-083 Project connection is to the 34.5 kV system. Therefore, the FE Protection staff conducted a short circuit review of the project connection. An assumption of this study was that solar generation projects will contribute no appreciable fault current to the breakers on the FE transmission system. As defined by EPRI: "Inverters are generally designed to limit fault currents to 130% or less of rated current. Thus they can usually be disregarded when conducting fault studies."¹ Based on this fact, the results of the FE analysis showed that no FE circuit breaker will exceed its interrupting capability with the implementation of the X3-083 Project. Therefore no circuit breaker reinforcements will be required.

System Protection Analysis

An analysis was conducted to assess the impact of the X3-083 Project on the system protection requirements in the area. The results of this review have identified the following:

Under the assumption that the X3-083 Project generation will not supply fault current to the Jersey Central transmission system, there will be no protection upgrades needed for the Kittatinny – Newton (E707) 34.5 kV path. However, the X3-083 Project will be required to have two fully independent and redundant high-speed zones of protection to sense and clear faults on the interconnection transformer.

The fault currents at the point of interconnection are listed below.

¹ EPRI Document TR-111490 "Integration of Distributed Resources in Electric Utility Distribution Systems: Distribution System Behavior Analysis for Suburban Feeder", published November 1998, page 62

	Three Phase	Line-Ground
X/R Ratio	3.0	3.1
Fault Current (Amps)	3605	1814

These values are for the current system configuration. Any system changes in the area could have a significant impact on these values. It will be the Interconnection Customer's responsibility to make any protection upgrades required should this occur.

For the 10 MW project, it is not recommended to add fusing on the line due to the low magnitude of maximum fault current available by the system.

A cost estimate of the FE system protection facilities required for the X3-083 is included on Attachment 4.

Metering

The FirstEnergy Revenue Metering Requirements may be found in the FirstEnergy Requirements for Transmission Connected Facilities document located at the following links:

www.firstenergycorp.com/feconnect

www.pjm.com/planning/design-engineering/to-tech-standards.aspx

Compliance Issues

The proposed interconnection facilities must be designed in accordance with the FirstEnergy "Requirements for Transmission Connected Facilities" located at:

<http://www.pjm.com/planning/design-engineering/to-tech-standards.aspx>

This includes the provision of a reactive power capability sufficient to maintain a composite power delivery for the facility at the interconnection point at a power factor between .95 leading (absorbing 3.3 MVAR) and .95 lagging (producing 3.3 MVAR). If this capability cannot be provided by the solar units, a dynamic device such as a STATCOM or SVC must be installed at the X3-083 Project substation at the Interconnection Customer's cost.

The Interconnection Customer will also be responsible for following the requirements of the "FirstEnergy Wholesale Generation Interconnection (WGI) Manual" and the "FE Approved Vendors and Contractors" documents which are also located at the above link.

In addition, the Interconnection Customer will be required to meet all PJM, ReliabilityFirst and NERC reliability criteria and operating procedures for standards compliance. For example, the Developer will need to properly locate and report the over and under-voltage and over and under-frequency system protection elements for its units as well as the submission of the generator model and protection data required to satisfy the PJM and ReliabilityFirst audits. Failure to comply with these requirements may result in a disconnection of service if the violation is found to compromise the reliability of the FE system.

FE Facility Upgrades and Costs

The results of the FE analysis shows that no planning criteria violations are attributable to the addition of the X3-083 Project for the conditions studied. Therefore the conclusion is that no Transmission or Distribution system reinforcements will be required to provide the requested service.

Interconnection Customer Requirements

In addition to the FE facilities, the Interconnection Customer will also be responsible for meeting all criteria as specified in the applicable sections of the "FE Requirements for Transmission Connected Facilities" document. Since the X3-083 Project will be connected to the 34.5 kV network, the Interconnection Customer will also be responsible for compliance with the FirstEnergy "Technical Requirements for the Interconnection of Parallel-Operated Generation to the FirstEnergy Distribution System". This includes but is not limited to the following:

1. The purchase and installation of the minimum required FE generation interconnection relaying and control facilities. This includes the installation of intertie relays at the point of interconnection that either trip the breaker at the point of interconnection or the individual generators beyond the point of interconnection. The function of the intertie relays must include over/under voltage and over/under frequency protection. Note that these intertie relays are in addition to and must be separate from the two relays that provide independent high speed zone of protection to sense and clear faults. They include the installation of an SEL-351-7 (Version 7) relay or its equivalent for power elements, a potential transformer or CCVT's on the high side of the transformer, and current transformers on the high side of the transformer.
2. The purchase and installation of the standard voice grade (analog) telephone line and associated conduit between the telephone company source and the meter socket or enclosure.
3. A compliance with the FE and PJM generator power factor and voltage control requirements. Note that the X3-083 Project will need to absorb reactive power at the point of interconnection to minimize the voltage change should the units rapidly reduce their output or trip off line
4. The execution of a back-up service agreement to serve the customer load supplied from the Interconnection Customer 34.5 kV substation when the units are out-of-service. This assumes the intent of the Interconnection Customer is to net the generation with the station load.
5. Any complaints from other customers (e.g. flicker complaints) will have to be corrected by the Interconnection Customer. Correction may include changing operation, reducing generation, disconnecting the generators from the Jersey Central system, or other measures.
6. The purchase and installation of supervisory control and data acquisition (SCADA) equipment to provide information in a compatible format to the FE Transmission System Control Center. The RTU, the communications channel and all related equipment will be furnished and maintained by the Interconnection Customer. The RTU must communicate with the FirstEnergy EMS via DNP 3.0 protocol.

7. The following status, control and metering points will be required:
 - a. Interconnection breaker position status and trip control.
 - b. Generator real and reactive power output measured at the high-side of the generator step-up transformer.
 - c. Generator voltage at the point of interconnection.
8. An installation of two independent high-speed zones of protection to sense and clear faults on the interconnection transformer.
9. A compliance with the inverter standard UL1741 and IEEE 1547, “Standard for Interconnecting Distributed resources with Electrical Power Systems”, in addition to the power quality standards defined by ReliabilityFirst and PJM.
10. The Interconnection Customer will not excavate, construct facilities or locate solar panels under the existing FE transmission facilities or on FE right-of-ways without the express permission of FE.

A provision of the necessary generator protection, synchronization controls, and fault detection to initiate a trip to protect the X3-083 Project equipment from faults on the Jersey Central System.

A compliance with the PJM Manuals and Operating instructions to have a plant operator on call 24/7 to respond within a minute to reduce the output of X3-083 Project when network constraints occur.

The above requirements are in addition to any metering or other requirements imposed by PJM.

Note that an assumption of this study is that the X3-083 Project generation will automatically be disconnected whenever the local area network is islanded. If this assumption is not correct, a direct transfer trip scheme will need to be implemented for such situations at the Interconnection Customer’s cost.

Network Impacts

Queue project X3-083 was studied as a(n) 10.0 MW (3.8 MW of which was Capacity) injection into JCPL's system at the W3-136 Tap 34.5 kV substation. Project X3-083 was evaluated for compliance with reliability criteria for summer peak conditions in 2015.

Potential transmission network impacts are as follows:

Generator Deliverability

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

No violations identified.

Multiple Facility Contingency

(Double Circuit Tower Line contingencies only with full energy output. Stuck Breaker and Bus Fault contingencies will be applied during the Impact Study)

No violations identified.

Contribution to Previously Identified Overloads

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue.)

No violations identified.

New System Reinforcements

(Upgrades required to mitigate reliability criteria violations, i.e. "Network Impacts", initially caused by the addition of this project generation.)

None required.

Contribution to Previously Identified System Reinforcements

(Overloads initially caused by prior Queue positions with additional contribution to overloading by this project. This project may have a % allocation cost responsibility which will be calculated and reported for the Impact Study.)

None required.

Short Circuit

(Report over-dutied breakers.)

None required.

Energy Portion of Interconnection Request

PJM also studied the delivery of the energy portion of the surrounding generation. Any potential problems identified below are likely to result in operational restrictions to the project under

study. The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection Request, a subsequent analysis will be performed which analyzes all overload conditions associated with the overloaded element(s) identified. As a result of the aggregate energy resources in the area, the following violations were identified.

No violations identified.

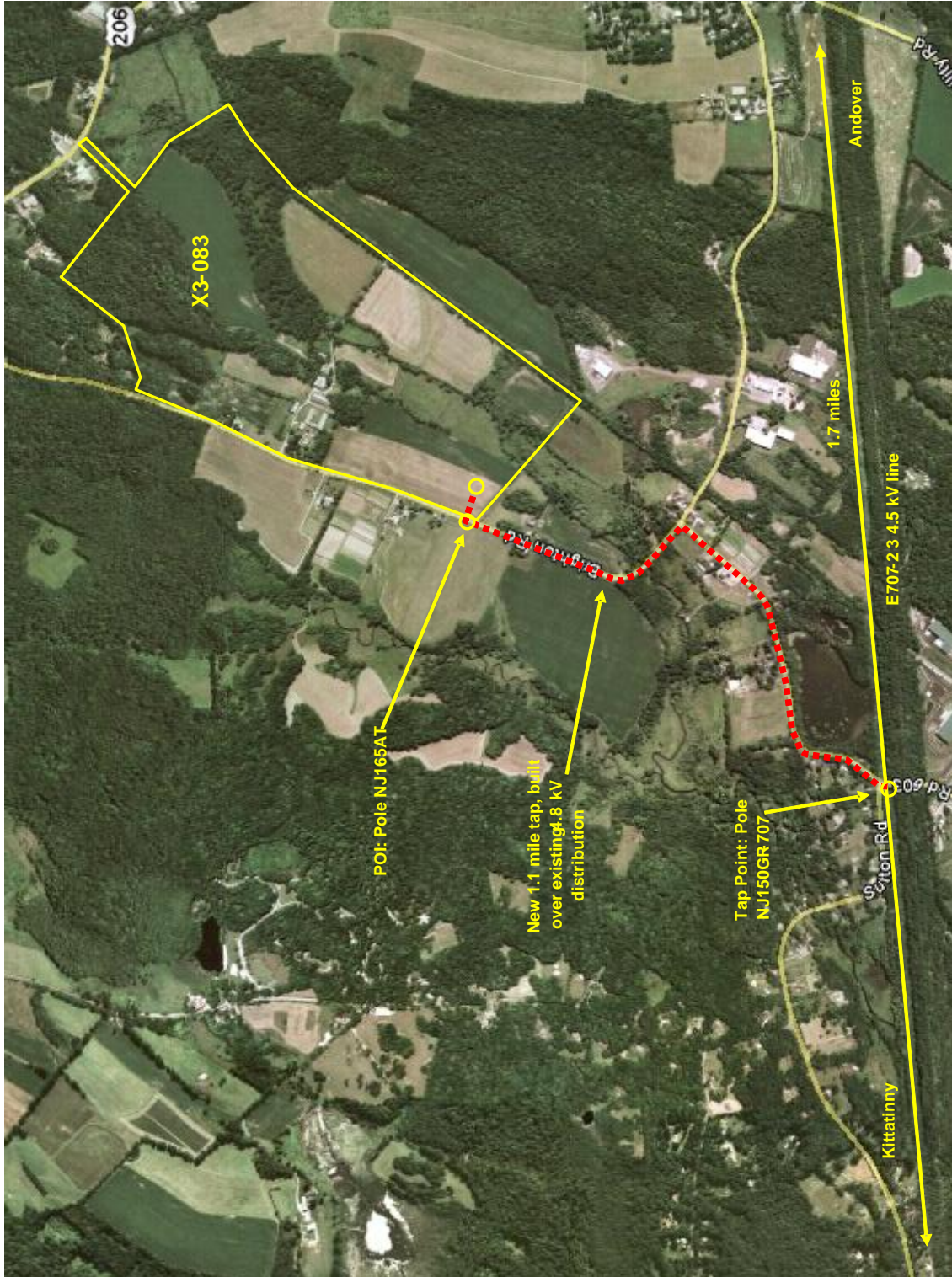
Summary

The connection of the X3-083 Project to the FE transmission system will require no network upgrades. Therefore the Interconnection Customer will only have a cost responsibility for the Direct Connection of the X3-083 Project to the Jersey Central transmission system. As shown on Attachment 4, the estimated cost of these facilities is \$1,781,000. This cost includes a CIAC (Contribution in Aid of Construction) Federal Income Tax Gross Up charge of \$436,100. This tax may or may not be charged based on whether or not this project meets the eligibility requirements of IRS Notice 88-129.

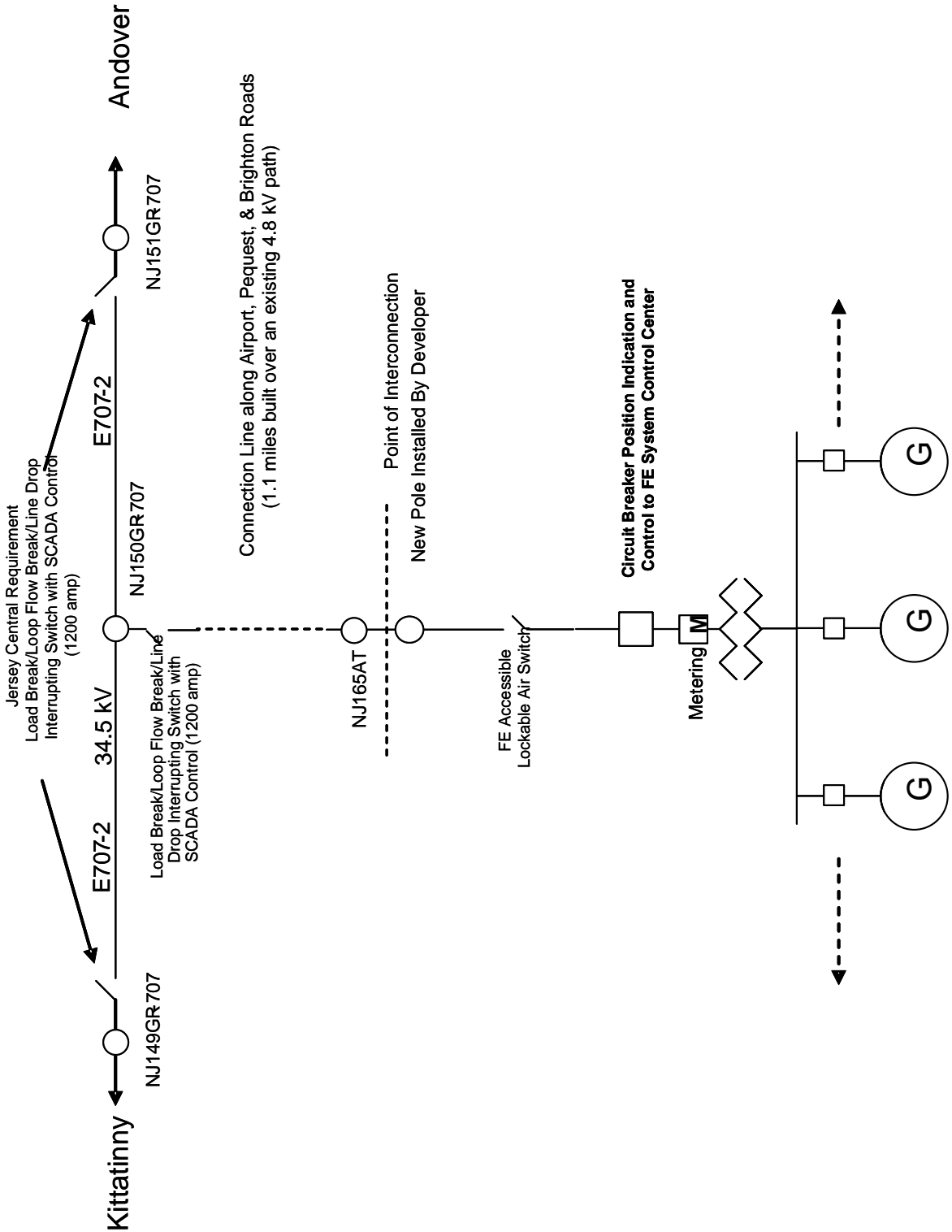
Based on the extent of the FE direct connection and system upgrades required to support this project, it is estimated that it will take eighteen (18) months from the date of a fully executed Interconnection Construction Service Agreement to complete the upgrades required for the X3-083 Project. Full payment of the estimated cost of the project will be required upon execution of the Interconnection Service Agreement/Interconnection Construction Service Agreement (ISA/CSA). True up of the actual cost versus estimated cost of the project will be performed by FE at the end of the project. As a requirement, the Interconnection Customer must provide the property for the attachment and right-of-way facilities that will be needed at the project initiation. It is also assumed that there will be no environmental issues with any of the new properties associated with this project, that there will be no delays in acquiring the necessary permits for implementing the defined direct connection and network upgrades, and that all 34.5 kV transmission system outages can be scheduled when needed.

Note that the FE findings were made from a conceptual review of this project. A more detailed review of the connection facilities and their cost will be identified in the Impact Study. Further note that the cost estimate data contained in this document should be considered as only ballpark since it was produced without a detailed engineering review. The applicant will be responsible for the actual cost of construction. FE herein reserves the right to return to any issues in this document and, upon appropriate justification, request additional monies to complete any connections to the transmission system.

Attachment 2
Aerial View



Attachment 3 Single Line Diagram



10 MW Total Solar Photo Voltaic Generation

Attachment 4
Estimated Costs

Item	Connection Facilities
1	Construct approximately 6000 feet of new overhead 34.5kV line from a point near pole NJ150GR-707 on the E707-2 34.5kV line (Kittatinny - Andover).
2	Construct a new tap pole, replace 33 existing distribution poles with taller subtransmission poles and overbuild new 34.5kV subtransmission tap line, install new switch on the tap, (Motor Operated/SCADA controlled load break switch included in estimate), install Motor Operated/SCADA controlled load break switches on poles NJ149GR-707 & NJ151GR-707, located on either side of proposed tap pole, and all necessary guying, etc. and a span of wire to a customer owned pole beyond the switch pole.
3	Transfer the existing distribution facilities between poles NJ150GR-707 and NJ165AT to the new transmission structures.
4	No environmental review has been performed, however since this proposed overbuild crosses existing streams, passes near a large lake, and involves replacing poles within 300 feet of the waterways, there is probable need for environmental permitting. An estimated cost of \$50,000 is included in the feasibility estimate. It is also estimated that there will be up to a 6 month lead time for State/Federal review and permit approval, if required, which may include “no work” timing restrictions for approval. If any protective matting or special vehicles are required for access to poles in wetlands, additional un-estimated costs will then be added.
5	No estimate for Right-of-Way investigation and engineering is included. Developer is responsible for providing valid rights to JCP&L to overbuild the existing distribution lines.
6	Estimate includes \$20,000 for tree trimming.
7	Estimate includes \$23,000 for metering to be mounted in customer substation.
8	Miscellaneous Protection, Fuses, Metering, RTU, SCADA
	Direct Connection Costs: \$ 1,344,900
	Taxes (if Applicable): \$ 436,100
	Total: \$ 1,781,000

Attachment 5
Solar Generation Project Analysis
2013 Peak Load Conditions

Full Energy Dispatch

Outage description	Overloaded Element	ID	MVA Rating		% of Rating	
			Normal	LTE	Normal	LTE
Newton - Montville (N2214) 230 kV	Newton - Mohawk 34.5 kV	Z702	27	27		140.0

Capacity Dispatch

Outage description	Overloaded Element	ID	MVA Rating		% of Rating	
			Normal	LTE	Normal	LTE
Newton - Montville (N2214) 230 kV	Newton - Mohawk 34.5 kV	Z702	27	27		122.9