

***Generation Interconnection
Feasibility Study Report (Web Version)***

For

***PJM Generation Interconnection Request
Queue Position W3-064***

Hunterstown 115kV Project

January, 2011

Overview

Interconnection Custom (IC) has submitted an Attachment N to propose the interconnection of 20 MW of solar powered generation for the purpose of selling up to 20 MW energy and 7.6 MW of Capacity into the PJM market via the MetEd (FirstEnergy) network.

The Commercial Operation date for this project is July 1, 2012. The analysis was performed using a 2014 base year. This project will be FERC Jurisdictional and will receive a PJM Interconnection Service Agreement.

PJM Report on the Transmission System

This portion of the report addresses the impacts on and the required reinforcements to that part of the transmission system under PJM jurisdiction.

Network Impacts

Queue project W3-064 was studied as a 20.0 MW (7.6 MW of which was Capacity) injection into ME's system at the Hunterstown 115.0 kV substation. Project W3-064 was evaluated for compliance with reliability criteria for summer peak conditions in 2014.

Potential transmission network impacts are as follows:

Option 1: Hunterstown 115 kV substation

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.

Option 2: W1-075 Tap 115.0 kV Substation

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

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No violations identified.

FirstEnergy Feasibility Analysis Report

This portion of this Feasibility Study Report has been prepared for PJM by MetEd (FirstEnergy). It addresses the impacts on and required reinforcements, if needed, including the attachment and direct connection facilities. It also presents the FirstEnergy standards-based requirements for interconnection.

Connection Facilities

In compliance with the PJM Generator Interconnection protocol, IC has submitted a "Form of Generation Interconnection Feasibility Study Agreement" to PJM that identifies its plan to construct the W3-064 Generation Project comprised of photo-voltaic solar panels and inverters. The installed facilities will have a total capability of 20 MW with 7.6 MW of this output being recognized by PJM as capacity. This means that the remaining 12.4 MW will be curtailable should a system reliability constraint occur.

The requested primary point of connection is the Hunterstown 115 kV substation. Note that in compliance with the FE Requirements for Transmission Connected Facilities document, the Hunterstown 115 kV substation must be reconfigured to a ring bus as a minimum standard. IC will be responsible for constructing all of the facilities on its side of the point of interconnection including the attachment line, and also will be responsible for acquiring all easements, properties and permits that will be needed.

Note that IC has chosen an alternate POI of connecting to the Hunterstown - Gardners (991) 115 kV line. In compliance with the FE Connection Requirements, a new 115 kV three breaker ring bus will be constructed for this project attachment. While FE will construct, own and operate the new 115 kV substation and the facilities required for its attachment to the FE system, IC will be responsible for acquiring all easements, properties and permits that will be needed, and also will be responsible for constructing all of the facilities on its side of the point of interconnection including the attachment line. IC will also be responsible for providing a level graded site for the new 115 kV substation and an access road as a prerequisite before work can begin. It has been determined that this alternate connection is feasible; however, a cost estimate for this option will not be provided in this Feasibility Study Report.

Power Flow Analysis

A Power Flow study was conducted to determine the reliability impact of the proposed Hunterstown 115kV (W3-064) Project on the FE Transmission System. This study was completed using a 2014 summer peak load power flow that contains a detailed representation of the Met-Ed transmission networks in the area of the proposed Hunterstown 115kV (W3-064) Project. 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 ReliabilityFirst, PJM or FE Planning Criteria and are attributable to this project.

The results of the FE analysis show that there are no network upgrades required for the deliverability of the Hunterstown 115kV (W3-064) Project generation to the Met-Ed

transmission system. There also are no reinforcements defined for previous projects for which this project will have an impact. However, voltage criteria violations such as high voltage under light load conditions and high and low voltages caused by swings in MW output of the attached generation may require a curtailment of the energy portion of the project at times.

Note that a further conclusion of this study is that it will be mandatory for the Hunterstown 115kV (W3-064) Project to have a range of dynamic reactive capability that supports its operation from a .95 lead to .90 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 IC fail to provide a dynamic reactive capability from the Hunterstown 115kV (W3-064) Project for any reason once interconnected, the Met-Ed 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

A short circuit analysis was conducted by PJM and confirmed by the FE Protection staff. 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 Hunterstown 115kV (W3-064) Project. Therefore no circuit breaker reinforcements will be required.

Note that stability studies will be conducted by the PJM staff should this project proceed to the Impact Study stage of the Generation Interconnection process.

System Protection Analysis

An analysis was conducted to assess the impact of the Hunterstown 115kV (W3-064) Project on the system protection requirements in the area. The results of this review have identified the following:

Under the assumption that the Hunterstown 115kV (W3-064) Project generation will not supply fault current to the Met-Ed transmission system, there will be no protection upgrades needed due to short circuit duty for the proposed project connection to the Hunterstown 115 kV substation.

Typical relaying will be required at the Hunterstown 115 kV substation for the radial attachment line to IC’s facilities. The specific detailed relaying requirements will be included in the Facilities Study; however, the typical cost of this relaying is included in the cost estimate for this Feasibility Study.

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

Fault current on the radial attachment line from the Hunterstown 115 kV substation are listed below:

Three phase : 18,424 amperes (X/R = 30.112)
Line-to Ground: 18,768 amperes (X/R = 29.355)

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 a IC responsibility to make any protection upgrades required should this occur.

Metering

IC will be required to comply with all FE Revenue Metering Requirements for Generation Interconnection Customers.

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 6.6 MVAR) and .90 lagging (producing 9.7 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 Hunterstown 115kV (W3-064) Project substation at IC’s cost.

IC 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, IC 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 Hunterstown 115kV (W3-064) Project for the conditions studied. Therefore the conclusion is that no transmission or distribution reinforcements will be required to provide the requested service.

Interconnection Customer Requirements

In addition to the FE facilities, IC will also be responsible for meeting all criteria as specified in the applicable sections of the "FE Requirements for Transmission Connected Facilities" document including:

1. The purchase and installation of the minimum required FE generation interconnection relaying and control facilities. This includes over/under voltage protection, over/under frequency protection, and zero sequence voltage protection relays.
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 Hunterstown 115kV (W3-064) Project may 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 34.5 kV substation when the units are out-of-service. This assumes the intent of IC 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 IC. 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 IC. The RTU must communicate with the FirstEnergy EMS via DNP 3.0 protocol.
7. The following status and metering points will be required:
 - a. Interconnection breaker position status.
 - 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. A provision of the necessary generator protection, synchronization controls, and fault detection to initiate a trip to protect the Hunterstown 115kV (W3-064) Project equipment from faults on the Met-Ed System.
11. 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 Hunterstown 115kV (W3-064) Project when network constraints occur.
12. IC will not excavate, construct facilities or locate solar panels under FE transmission facilities or on FE right-of-ways without the express permission of FE.

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

For the alternative connection to the Hunterstown – Gardners (991) 115 KV circuit, an assumption of this study is that the Hunterstown 115kV (W3-064) 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 IC's cost.

Summary

The connection of the Hunterstown 115kV (W3-064) Project to the FE transmission system will require no network upgrades. Therefore IC will only have a cost responsibility for the Direct Connection of the Hunterstown 115kV (W3-064) Project to the Met-Ed transmission system. The estimated cost of the facilities for the primary connection to the Hunterstown 115 kV substation is \$4,861,000.

Based on the extent of the FE direct connection and system upgrades required to support this project, it is estimated that it will take two (2) years from the date of a fully executed Interconnection Construction Service Agreement to complete the upgrades required for the Hunterstown 115kV (W3-064) 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. It further assumes that IC will provide the property for the attachment and right-of-way facilities that will be needed. A further assumption is 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 PJM will allow all 115 kV transmission system outages when requested.

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.