AEP Recommendations Based on Generation Interconnection Queue Coordination Alternatives PJM and MISO Reviewed with the PJM-MISO Order 1000 Stakeholders on January 16, 2013

Alternative #1, as outlined in the presentation that PJM reviewed with the PJM-MISO Order 1000 stakeholders on January 16, 2013, does not show PJM and MISO as providing comparable service to their interconnection customers. MISO interconnection queue customers have the opportunity to learn what constraints they may be responsible for mitigating in PJM after the MISO System Impact Study is performed. However, PJM interconnection queue customers have to wait until after their Facility Study to learn what they'll be responsible for in MISO.

The PJM Facility Study is generally an engineering estimation and preliminary design effort. Delaying the MISO analysis of impacts until this stage has the potential to substantially change the extent of upgrades required. It does not serve any of the parties involved (PJM, TOs, customers) to invest in detailed estimates of the attachment facilities and PJM upgrades in parallel with MISO potentially determining either that extensive upgrades are needed that make the project clearly uneconomic, or that MISO would optimally use completely different upgrades to fix the combined set of constraints in MISO and PJM.

The above concerns can be addressed by having PJM provide MISO with the GI information before the PJM System Impact Study rather than after that point. The attached slide from the January 16th meeting has been modified to illustrate this change (solid arrow from the end of the PJM System Impact Study to the start of the MISO System Impact Study has been replaced by the dashed arrow from the start of the PJM System Impact Study to the start of the MISO System Impact Study). Although PJM and MISO may have considered and rejected this information sharing sequence, AEP sees merit in having such an information sharing sequence reconsidered.
ALTERNATIVE #1

GI and Network Upgrade information sharing sequence

PJM evaluates MISO unit impact on PJM transmission

Feasibility Study

System Impact Study

PJM performs Facility Study

MISO IC funds PJM Network Upgrades

FSA

Facility Study

ISA

PJM IC funds MISO Network upgrades

MISO evaluates PJM unit impact on MISO transmission

MISO performs Facility Study

Feasibility Study and M2

System Impact Study

Network Upgrade Facility Study

GIA and MPFCA

MISO to provide PJM with GI info

PJM to provide MISO with GI info