



Interconnection Process  
Workshop 2 Feedback

## Overview

- Eastern Generation, LLC (“Eastern Gen”) owns and operates New Covert Generating, LLC (“Covert”) an 1,055 MW CCGT located in AEP (Michigan).
- Eastern Gen submitted an interconnection application (AD2-075) in March 2018 which was to recognize an additional 145 MW of CIRs related to upgrades performed on existing GTs; this work was completed in April 2020.
- To date, Eastern Gen has experienced the following issues with the Interconnection Process:
  1. The results of AD2-075’s System Impact Study (“SIS”) did not meet the OATT definition; *“the [SIS] identifies the system constraints, identified with specificity by transmission element or flowgate, relating to each proposed new project and service included therein...”*
  2. PJM has insisted that AD2-075 enter its Facilities Study without certainty on whether any upgrades are required to be addressed.
  3. The Feasibility Study report is expected to be delivered within four months according to the OATT, but in the case of AD2-075, it was provided in December 2018, which was five months after the promised date of July 31, 2018. The SIS is expected to be delivered within four months according to the OATT, but there has been a total delay of 13 months, after the original SIS report deadline of June 2019.
  4. PJM has not coordinated with MISO nor has PJM given clear instructions of what is required of Eastern Gen with respect to MISO’s interconnection process.

## SIS Issues

- The results of AD2-075's System Impact Study ("SIS") did not meet the OATT definition; *"the [SIS] identifies the system constraints, identified with specificity by transmission element or flowgate, relating to each proposed new project and service included therein..."*
- After receiving the SIS report in July 2020, Eastern Gen still does not know if we have an allocation to the Benton Harbor transformer upgrade noted in the SIS report.
- According to the OATT, the SIS report should provide the Interconnection Customer with certainty on which upgrades and the cost allocation it is responsible for, but PJM has yet to meet this requirement for AD2-075.
- Eastern Gen proposes that PJM identify why it has not met the standard as set forth in the OATT.

## Timeline Delays

- The Feasibility Study report is expected to be delivered within four months according to the OATT, but in the case of AD2-075, it was provided in December 2018, which was five months after the promised date of July 31, 2018.
- The SIS is expected to be delivered within 120 days (i.e., 4 months) according to the OATT, but in the case of AD2-075 the schedule was as follows:
  - Report was expected by June 2019 based on the OATT and delayed receipt of the Feasibility Study report.
  - Since the stability analysis could not be completed timely, PJM then stated that the report would be delivered by mid-July 2019.
  - Mid-July 2019 changed to the end of July 2019, as PJM needed to focus on OATT requirements to complete AE2 queue Feasibility Studies.
  - In October 2019, PJM informed Eastern Gen that they would need two (2) weeks to complete the SIS report as 1) the AF1 queue was now the center of their OATT based focus regarding deadlines for completion of studies, and 2) that the withdrawal of a large project required a re-tool prior to the issues of the SIS report.
  - The 2 weeks changed into receiving the retooled SIS report 8 months later on July 1, 2020.
  - This resulted in a total delay of one (1) year and a month, after the original SIS report deadline of June 2019.

## MISO Coordination

- PJM and MISO complete affected system studies and assign impacts and upgrades to generation queue projects in each other's transmission footprints, but do not follow up to install those upgrades, and, in the case of AD2-075, even several years after the impact was identified.
- This has the unfortunate consequence of slowing down the interconnection process with no certainty on completion of earlier upgrades for later queued projects that do not have allocations to an upgrade, but need the upgrades installed to go into service.
- Although both MISO and PJM indicate which RTO's rules will be enforced for allocating upgrades that cross transmission footprints, PJM does not clearly show how allocations are split when costs are shared by both PJM and MISO projects.
- PJM should identify answers to the following questions:
  1. How are queue projects from MISO and PJM organized in queue order, when both RTOs' queues do not close at the same time?
  2. If queue projects from MISO and PJM line up in terms of queue entry/queue close dates (e.g., March 2021 is close date for both MISO and PJM queues next year), which project is assumed to be first to cause the need for an upgrade, if an impact is identified and shared by projects in both areas?