

New Service Requests Deficiency Review Requirements

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- PJM processes New Service Requests under several parts of its Tariff
- PJM administers two New Services Queue windows each year
 - April 1 – September 30
 - October 1 – March 31
- Current Tariff provisions establish tight time frames that:
 - Require PJM to acknowledge receipt of and review a New Service Request, and issue a notice of deficiencies, within five Business Days (“Acknowledgement and Review Phase”)
 - Require the Interconnection Customer (“IC”) to respond to a deficiency notice within 10 Business Days
 - Provide PJM an additional five Business Days to review the IC’s response to the deficiency notice

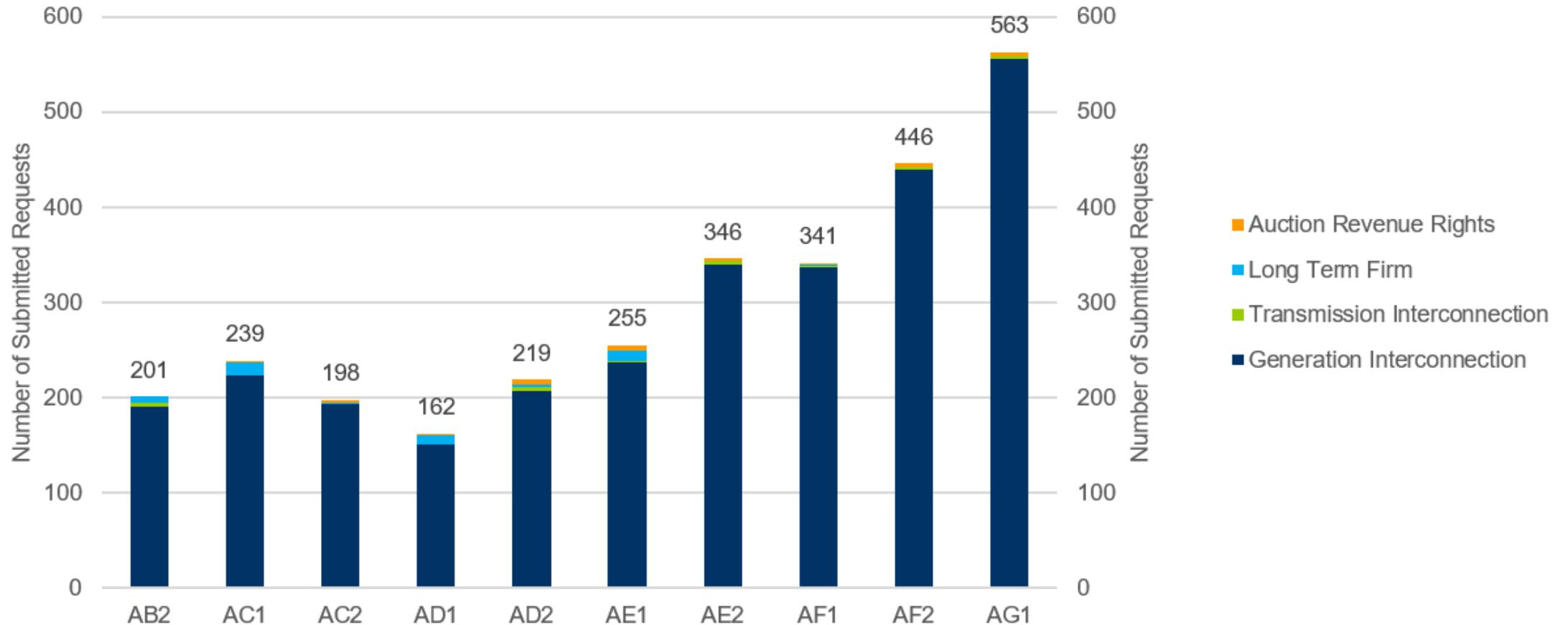
- PJM typically receives 50% or more of the total number of New Service Requests during the last month of a queue window, with most of those being submitted during the last week/on the last day
 - PJM employees have a short window to process an extremely large volume of requests; this also impacts PJM's ability to perform reviews of New Service Requests submitted at the beginning of the following queue
- The following table illustrates the trend of the bulk of the New Service Requests being submitted during the last month (especially last week and last day) of queue windows

New Service Requests Deficiency Review Requirements Background

- PJM has been experiencing an increasingly high volume of New Service Request submissions
- The AG1 New Services Queue represented an approximately 27% increase in total number of New Services Requests over the AF2 New Services Queue, and an approximately 65% increase over each of the AF1 and AF2 New Services Queues
- The following tables illustrate the increasing total number of New Service Requests submitted in each queue window in recent years and the number of New Service Requests received relative to the number of days left in a queue window



New Service Requests Deficiency Review Requirements Background – Table of Number of New Service Requests



Queue New Service Requests Deficiency Review Requirements Background – Table of New Service Requests by Remaining Queue Window Days

| Days Before Close | AD1 | AD2 | AE1 | AE2 | AF1 | AF2 | AG1 |
|------------------------------|------------|------------|------------|------------|------------|------------|------------|
| 120+ days | 19 | 23 | 29 | 17 | 37 | 39 | 26 |
| 90-120 days | 7 | 10 | 12 | 13 | 11 | 12 | 20 |
| 60-90 days | 21 | 14 | 33 | 17 | 19 | 40 | 47 |
| 30-60 days | 29 | 22 | 34 | 87 | 33 | 36 | 37 |
| 14-30 days | 13 | 9 | 17 | 42 | 24 | 39 | 46 |
| 7-14 days | 18 | 80 | 15 | 75 | 53 | 41 | 47 |
| 6 days | 0 | 0 | 38 | 6 | 5 | 16 | 7 |
| 5 days | 6 | 7 | 18 | 6 | 27 | 18 | 25 |
| 4 days | 4 | 2 | 24 | 3 | 12 | 49 | 0 |
| 3 days | 1 | 12 | 11 | 18 | 34 | 7 | 0 |
| 2 days | 12 | 9 | 22 | 34 | 0 | 0 | 38 |
| 1 day | 13 | 29 | 1 | 15 | 0 | 37 | 23 |
| 0 days | 18 | 1 | 1 | 13 | 86 | 111 | 247 |
| Total | 161 | 218 | 255 | 346 | 341 | 445 | 563 |

New Service Requests Deficiency Review Requirements Background

- In March 2020, in response to COVID-19 implications, PJM sought and received a waiver of the Acknowledgement and Review Phase (Docket No. ER20-1392-000)
- In September 2020, in response to the high volume of New Service Requests, PJM sought and received a waiver of the Acknowledgement and Review Phase (Docket No. ER20-2914-000)
- In January 2021, in response to the high volume of New Service Requests, PJM again sought waiver of the Acknowledgement and Review Phase – for end of Queue window AG2 and Beginning Queue window AH1 (Docket No. ER21-1016-000)
- Given the systemic increased volume issue, PJM’s solution proposal changes its current rules to avoid the need for additional waiver requests every six months

New Service Requests Deficiency Review Requirements Proposed Solution

- PJM's proposed solution is to change its current rules to:
 - Require PJM to review a New Service Request, and issue a notice of deficiencies, within 15 Business Days (“Review Phase”) or to use Reasonable Efforts to do so as soon thereafter as practicable
 - Move up the closing of the New Services Queue by approximately three weeks (Sept. 10 & March 10 for each respective queue window) to allow for time to review applications and not affect the model build & analysis
 - This proposal does not impact the deficiency response period presently afforded to New Service Customers
 - Provide PJM 15 Business Days to review the IC's response to the deficiency notice or to use Reasonable Efforts to do so as soon thereafter as practicable
- Draft redlined tariff language is posted with today's materials for informational purposes only



New Service Requests Deficiency Review Requirements Quick Fix Timeline

- 4/6 – PC First Read
- 4/21 – MRC First Read
- 5/11 – PC Endorsement
- 5/26 – MRC Endorsement
- 6/23 – MC Endorsement

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