

PJM CIFP -Large Load Additions: PPL EU Proposal

Executive Summary

Proposal Overview:

The existing PJM FERC Order 2023 generation cycle process has subsequent cycle application submission periods that abut. This means that anyone can submit an application for generator interconnection at any time and there will always be a cycle to receive the submission.

Elements taken outside of and run in parallel with this process are quite likely to cause Cycle delays because of impacts on case builds, ongoing studies, and ongoing decision points in this primary cycle process. As such, it is paramount that any elements brought outside of this process should only be brought out to specifically serve the purpose of meeting unique and time-sensitive reliability needs.

The PJM Large Load CIFP proposal component called the Expedited Interconnection Track (EIT) appears to have some weaknesses in this regard. First, the PJM proposal is not tied in any concrete way to reliability, and second, it appears to be unnecessarily outside of the existing cycle process when the current process can accommodate a process like it; absorbing the EIT within the existing cycle process would minimize impacts on the flow and timeline.

PPL EU's proposal modifies the PJM EIT proposal to create an EIT process that works with the existing queue process, does not delay or derail engineering and planning for projects within a queue cycle, and allows for projects meeting narrow fast track criteria to be integrated smoothly.

Proposed modifications to the PJM EIT proposal:

- (1) PJM will define Sub-Regional Generation Zones and for each cycle, prior to the opening of the application submission window, will provide target Sub-Regional Resource Adequacy and Reliability (SRRAR) MW values for each Generation Zone.
- (2) Each Generation Developer that submits into the FERC Order 2023 cycle process shall indicate whether it believes it qualifies for EIT, based on PJM's proposed eligibility criteria and will meet all eligibility requirements (including (3) below).
- (3) Additional eligibility requirement for EIT is that the project POI is located in a Generation Zone that has MWs available to be met under that Zones PJM-provided SRRAR MW target.
- (4) PJM will carry out a serial, ongoing study of eligible generators as they come in throughout the application submission window such that by the time Phase 1 is ready to begin all studies and determinations will have been made on the EIT generation, and the

Phase 1 cases can be updated to contain them. This will minimize the potential for the EIT process to impact the primary FERC Order 2023 cycle process.

- (5) EIT generation would proceed with GIA's, etc., outside of the Order 2023 cycle process once studies complete and generation and Network Upgrades are fed into Phase 1 cases.

Sub-Regional Generation Zone EIT Targets Overlayed on Existing Order 2023 Cycle Process

