PJM’s Implementation of Order 845

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• On September 24, 2018, the Edison Electric Institute on behalf of its members (EEI) submitted a motion requesting an extension of the compliance deadline for Order No. 845.

• On October 3 the Commission granted EEI’s request and extended the date to comply to within ninety (90) days of the Commission’s issuance of an order addressing the multiple pending requests for rehearing of Order No. 845.
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PJM’s Proposed Implementation for the 10 Adopted Reforms
Interconnection Customer’s Option to Build

• Provides:
  – Interconnection Customer may request Option to Build unilaterally
  – Applicable to Transmission Owner interconnection facilities and stand alone network upgrades

• Current process
  – IC may request Option to Build through mutual agreement with Transmission Owner or when Transmission Owner cannot meet the Interconnection Customer’s schedule
  – All network upgrades listed in the System Impact Study are available for Option to Build
Interconnection Customer’s Option to Build

• Changes
  – OATT: CSA Section 3.2.3:
    • Allow Interconnection Customer to elect Option to Build for Direct Connection Network Upgrades or Transmission Owner Attachment Facilities. The Transmission Owner and Interconnection Customer must agree on which network upgrades fall into these categories.
    • Interconnection Customer will have no rights for Option to Build for Non-Direct Network Upgrades or Local Upgrades.
  – OATT: CSA Section 3.2.2:
    • If the Interconnected Transmission Owner cannot meet the Interconnection Customer’s in-service date for the work the Interconnected Transmission Owner and the Interconnection Customer may mutually agree to a Negotiated Contract Option.
    • Note: Given the expanded scope of Option to Build, PJM is currently reviewing the FERC pro forma LGIA to identify differences between PJM and Commission language to ensure that any protections the Commission assumes are in place are considered as additions to the compliance filing.
3.2.2 Negotiated Contract Option:

As an alternative to the Standard Option set forth in Section 3.2.1 of this Appendix 2, if the Interconnected Transmission Owner cannot meet Interconnection Customers in-service date for the work specified in Schedule C of this Agreement, the Interconnected Transmission Owner and the Interconnection Customer may mutually agree to a Negotiated Contract Option for the Interconnected Transmission Owner’s design, procurement, construction and installation of the Transmission Owner Interconnection Facilities work set forth in Schedule C of this Agreement. Under the Negotiated Contract Option, the Interconnection Customer and the Interconnected Transmission Owner may agree to terms different from those included in the Standard Option of Section 3.2.1 above and the corresponding standard terms set forth in the applicable provisions of Part VI of the Tariff and this Appendix 2.

Under the Negotiated Contract Option, negotiated terms may include the work schedule applicable to the Interconnected Transmission Owner’s construction activities and changes to same (Section 3.3 of this Appendix 2); payment provisions, including the schedule of payments, incentives, penalties and/or liquidated damages related to timely completion of construction (Section 3.2.1 of this Appendix 2); use of third party contractors; and responsibility for Costs, but only as between the Interconnection Customer and the Interconnected Transmission Owner that are parties to this Interconnection Construction Service Agreement; no other Interconnection Customer’s responsibility for Costs may be affected (Section 217 of the Tariff). No other terms of the Tariff or this Appendix 2 shall be subject to modification under the Negotiated Contract Option. The terms and conditions of the Tariff that may be negotiated pursuant to the Negotiated Contract Option shall not be affected by use of the Negotiated Contract Option except as and to the extent that they are modified by the parties’ agreement pursuant to such option. All terms agreed upon pursuant to the Negotiated Contract Option shall be stated in full in an appendix Schedule H to this Interconnection Construction Service Agreement.

If the Parties are unable to reach agreement on such terms and conditions, then pursuant to Section 3.2.1 (Standard Option), Interconnected Transmission Owner shall assume responsibility for the design, procurement and construction of all facilities other than those facilities identified in Schedule D of this Agreement.
3.2.3 Option to Build

3.2.3.1 Option:

In the event that the Interconnected Transmission Owner and the Interconnection Customer are unable to agree upon the terms of an Interconnection Construction Service Agreement (3) on or before the date that is 30 days after Interconnection Customer’s execution of the Interconnection Service Agreement, or (b) by such earlier date as is reasonable in the light of the schedule for construction of the Interconnection Facilities, as set forth in the Facilities Study and subject to the terms and conditions set forth in Section 2 and 3 of this Appendix, or if mutually agreed by and between the Interconnection Customer and the Interconnection Owner, the Interconnection Customer shall have the right, but not the obligation (“Option to Build”), to design, procure, construct and install all or any portion of the Transmission Owner Interconnection Facilities [that are Direct Connection Network Upgrades or Transmission Owner Attachment Facilities] on the dates specified in Schedule 7. Transmission Owner and Interconnection Customer must agree as to what constitutes Direct Connection Network Upgrade or Transmission Owner Attachment Facilities and identify such Direct Connection Network Upgrades or Transmission Owner Attachment Facilities in Schedule 7. Except for Direct Connection Network Upgrades or Transmission Owner Attachment Facilities, Interconnection Customers shall have no right to construct Network Upgrades or Local Upgrades under this option.

In order to exercise this Option to Build, the Interconnection Customer must provide Transmission Provider and the Interconnected Transmission Owner with written notice of its election to exercise the option by no later than 30 days after Interconnection Customer’s recent of the Facilities Study seven days after the date that is 30 days after Interconnection Customer’s execution of the Interconnection Service Agreement, specifying either that a mutual agreement has been reached between the Interconnection Customer and the Interconnected Transmission Owner that the Interconnection Customer will exercise the Option to Build, or the specific terms and conditions of the Interconnection Construction Service Agreement upon which the Interconnected Transmission Owner and the Interconnection Customer are unable to agree and the efforts undertaken by the Interconnection Customer to resolve such disagreement provided, however, that the Interconnected Customer and the Interconnected Transmission Owner may by mutual agreement extend the time period for exercise of the option.
Dispute Resolution

• Requires the ability for a party making an Interconnection Request to unilaterally request non-binding dispute resolution.

• The new Non-Binding Dispute Resolution Procedures provide an additional ADR step specifically for Interconnection Request and interconnection procedure disputes.

• The current dispute resolution process contained in OATT, section 12.1 needs to be modified to include interconnection customers.

• “Non-Binding Dispute Resolution Procedures” will become a new section contained in Tariff, Part IV, Subpart A, section 40.
New Section: Tariff, Part IV, Subpart A, section 40

Non-binding dispute resolution procedures. If a Party has submitted a Notice of Dispute notice of dispute pursuant to Tariff, section 12.1.4.1, and the Parties are unable to resolve the claim or dispute through unassisted or assisted negotiations within the thirty (30) Calendar Days days (or such other period as the parties to the dispute may agree upon) provided in that section, and the Parties cannot reach mutual agreement to pursue the Tariff, section 12.2.4.5 External Arbitration Procedures arbitration process, a Party may request that Transmission Provider engage in Non-binding Dispute Resolution pursuant to this section by providing written notice to Transmission Provider ("Request for Non-binding Dispute Resolution"). Conversely, either Party may file a Request for Non-binding Dispute Resolution pursuant to this section without first seeking mutual agreement to pursue the Tariff, section 12.2.4.5 External Arbitration Procedures arbitration process. The process in this section Tariff, Part IV, Subpart A, section 40 shall serve as an alternative to, and not a replacement of, the Tariff, section 12.2 External Arbitration Procedures section 13.5 arbitration process. Pursuant to this process, a transmission provider must within 30 days of receipt of the Request for Non-binding Dispute Resolution appoint a neutral decision-maker that is an independent subcontractor that shall not have any current or past substantial business or financial relationships with either Party. Unless otherwise agreed by the Parties, the decision-maker shall render a decision within sixty (60) Calendar Days of appointment and shall notify the Parties in writing of such decision and reasons therefore. This decision-maker shall be authorized only to interpret and apply the provisions of the LGIP and LGIA and shall have no power to modify or change any provision of the LGIP and LGIA in any manner. The result reached in this process is not binding, but, unless otherwise agreed, the Parties may cite the record and decision in the non-binding dispute resolution process in future dispute resolution processes, including those contained in Tariff, section 12.2 External Arbitration Procedures section 13.5 arbitration, or in a Federal Power Act section 206 complaint. Each Party shall be responsible for its own costs incurred during the process and the cost of the decision-maker shall be divided equally among each Party to the dispute.
Identification and Definition of Contingent Facilities

- Requires definition and methodology to identify contingent facilities.

- PJM currently identifies all constraints and contingent facilities in the System Impact Study Reports including baseline upgrades, Network Upgrades, and Supplemental projects that may impact the Interconnection Request.

- Changes:
  - OATT: New definition, changes to section 205.2 (Scope of Studies)
  - Manual 14A: Clarification to existing language
  - Since last Special PC PJM has changed the term “Interconnection Customer” to “New Service Customer” and replaced a specific Manual citation with “in accordance with the PJM Manuals”
ADD DEFINITION TO TARIFF:

“Contingent Facilities shall mean those unbuilt interconnection facilities and network upgrades upon which the interconnection request New Service Customer’s costs, timing, and study findings are dependent, and if not built could cause a need for interconnection revisions or reassessments of the network upgrades, costs or timing.”

205.2 Scope of Studies:
The System Impact Study is a comprehensive regional analysis of the effect of adding to the Transmission System the new facilities and services contemplated by the New Service Customers and an evaluation of their impact on deliverability to the aggregate of PJM Network Load. The System Impact Study identifies the system constraints, identified with specificity by transmission element or flowgate, relating to each proposed new project and service included therein and the Attachment Facilities, Merchant Network Upgrades, Direct Assignment Facilities, Local Upgrades, and/or Network Upgrades required to accommodate such projects. PJM shall identify Contingent Facilities in the System Impact Study by reviewing unbuilt Network Upgrades or those still subject to cost allocation pursuant to Attachment B in accordance with the PJM Manuals. Attachment B, associated with another Interconnection Customer with a higher Queue priority upon which the Interconnection Customer’s costs, timing and study findings are dependent, and if delayed or not built could cause a need for interconnection revisions or reassessments of the unbuilt Network Upgrades, costs or timing. The System Impact Study provides refined and comprehensive estimates of co-responsibility and construction load times for new facilities and system upgrades. The Transmission Provider, in its sole discretion, may determine to evaluate in the same System Impact Study two or more New Service Requests relating to interconnections, Upgrade Requests, or proposed new transmission services where the associated increases in service or capability are in electrical proximity to each other. Each System Impact Study shall identify the system constraints, identified with specificity by transmission element or flowgate, relating to the New Service Requests being evaluated in the study and, as applicable to each included request, the realistic options, additional Direct Assignment Facilities, necessary Merchant Network Upgrades, Attachment Facilities, Local Upgrades, and/or Network Upgrades necessary to accommodate such request. The System Impact Study shall refine and more comprehensively estimate each New Service Customer’s cost responsibility (determined in accordance with Section 317 of the Tariff) for necessary facilities and upgrades that the estimates provided in the Interconnection Feasibility Study or the Firm Transmission Feasibility Study, if applicable. In the event that more than one New Service Request is evaluated in a study, the Transmission Provider may provide a series of estimates to each participating New Service Customer to reflect the customer’s estimated cost responsibility based on varying assumptions regarding the number of New Service Customers that decide to continue their New Service Requests after completion of the System Impact Study. A description of the Transmission Provider’s methodology for completing a System Impact Study for Completed Applications is provided in Attachment D of the Tariff. If applicable, the System Impact Study for a Transmission Interconnection Customer shall also include a preliminary estimate of the Incremental Deliverability Rights associated with the customer’s proposed Merchant Transmission Facilities.
Transparency Regarding Study Models and Assumptions

- Requires increased transparency of the network models and underlying assumptions.

- PJM currently publishes all base case models on a protected section of the website for customers with Critical Energy Infrastructure Information access.

- Assumptions for each Transmission Owner zone are presented during the TEAC meetings and published with the meeting materials on PJM’s website.

- Changes:
  - OATT: clarification of existing processes, changes to section 36.1.7 (Base Case Data)
Transparency Regarding Study Models and Assumptions

STUDY MODELS AND ASSUMPTIONS

Suggested readlines for OATT, section 36.1.7 Base Case Data:

Current OATT, section 36.1.7 Base Case Data

Transmission Provider shall provide, maintain interconnection Customer with base power flow, short circuit and stability databases, including all underlying assumptions, and contingency list on a password-protected website upon request and subject to the confidentiality provisions of Tariff section 223 Section 223 of the Tariff. Additionally, Transmission Provider shall maintain network models and underlying assumptions on a password-protected website. Such network models and underlying assumptions will reasonably represent those used during the most recent interconnection study and be representative of current system conditions. Transmission Provider may require interconnection Customer’s password-protected website users to must sign any required confidentiality agreement before the release of commercially sensitive information or Critical Energy Infrastructure Information in the Base Case data. Such databases and lists, hereinafter referred to as Base Cases, shall include all (i) generation projects and (ii) transmission projects, including merchant transmission projects, that are included in the then-current, approved Regional Transmission Expansion Plan.
• Requires the definition of a Generating Facility to include storage facilities.

• PJM already treats storage resources as generation facilities for the Interconnection Process.

• Changes:
  – OATT: Add pro-forma definition of Generation Facility to the Tariff. Make appropriate changes to other sections of the Tariff to conform to the definition.
Definition of Generating Facility to Include Storage for Later Use.

Commission Required Change:

“Generating Facility shall mean Interconnection Customer’s device for the production and/or storage for later injection of electricity identified in the Interconnection Request, but shall not include the interconnection customer’s Interconnection Facilities.”

RAA Definition: Capacity Resources: “Capacity Resources” shall mean megawatts of (i) net capacity from Existing Generation Capacity Resources or Planned Generation Capacity Resources meeting the requirements of the Reliability Assurance Agreement, Schedules 9 and Reliability Assurance Agreement, Schedule 10 that are or will be owned by or contracted to a Party and that are or will be committed to satisfy that Party's obligations under the Reliability Assurance Agreement, or to satisfy the reliability requirements of the PJM Region, for a Delivery Year, (ii) net capacity from Existing Generation Capacity Resources or Planned Generation Capacity Resources not owned or contracted for by a Party which are accredited to the PJM Region pursuant to the procedures set forth in such Schedules 9 and 10; and (iii) load reduction capability provided by Demand Resources or Energy Efficiency Resources that are accredited to the PJM Region pursuant to the procedures set forth in the Reliability Assurance Agreement, Schedule 6.

Change to RAA Definition: Generation Capacity Resource: “Generation Capacity Resource” shall mean a Generating Facility or the contractual right to capacity from a specified generation unit, that meets the requirements of RAA, Schedule 9 and RAA, Schedule 10, and, for generation units that are committed to an FRR Capacity Plan, that meets the requirements of RAA, Schedule 8.1. A Generation Capacity Resource may be an Existing Generation Capacity Resource or a Planned Generation Capacity Resource.

• “Customer Facility,” shall mean Generating Facilities or Merchant Transmission Facilities interconnected with or added to the Transmission System pursuant to an Interconnection Request under Subparts A of Tariff, Part IV

• “Energy Resources,” shall mean a Generating Facility that is not a Capacity Resource
Interconnection Study Deadlines

• Requires quarterly, public reporting on study report performance statistics for a rolling 3-year period.
  – Feasibility Study performance and backlog
  – System Impact Study performance and backlog
  – Facilities Study performance and backlog
  – Withdrawn projects
  – Hours spent by all parties working on Interconnection studies

  – Greater that 25% of projects issued after the study deadline will initiate a formal reporting requirement to the Commission for at least 1 year
Interconnection Study Deadlines

• Changes that will be requested by PJM:
  – Extend reporting period to 6-months consistent with the 6-month queue cycle - this will require a request for regional variation
  – Include a count of non-backlogged projects
  – Modification to the late issuance rate calculation
  – Include categories for all points when a project withdraws

• Changes for Transmission Owners:
  – All Transmission Owners must provide invoices to PJM for reimbursement by the Interconnection Customer.
  – TOs must now also provide employee and contractor hours associated with Interconnection studies

• OATT Changes
  – New OATT section to document requirements and metrics
Interconnection Study Deadlines

Changes proposed by Planning for a new section in the Tariff (redlines represent changes from the proposed language in the Order):

Part IV, Subpart B

3.6.2.11 Transmission Provider will maintain on its OASIS or its website summary statistics related to processing Interconnection Studies pursuant to Interconnection Requests, updated quarterly every six months. If Transmission Provider posts this information on its website, a link to the information must be provided on Transmission Provider’s OASIS site. For each calendar month, six month reporting period, Transmission Providers must calculate and post the information detailed in sections [3.6.2.4.2-1.1] through [3.6.2.4.2-1.14].

3.6.2.12 Interconnection Feasibility Studies processing time.

(A) Number of Interconnection Requests that had Interconnection Feasibility Studies completed with Transmission Provider’s coordinated region during the reporting six month reporting period.

(B) Number of Interconnection Requests that had Interconnection Feasibility Studies completed within Transmission Provider’s coordinated region during the reporting quarter six month reporting period that were completed more than timeline as listed in Transmission Provider’s LGIP after receipt by Transmission Provider of the Interconnection Customer’s executed Interconnection Feasibility Study, after the Interconnection Feasibility Study deadline specified in Section 30.2.

(C) At the end of the six month reporting period, the total number of active valid Interconnection Requests with ongoing incomplete Interconnection Feasibility Studies.

(D) At the end of the reporting quarter six month reporting period, the number of active valid Interconnection Requests with ongoing incomplete Interconnection Feasibility Studies where such Interconnection Requests had an executed Interconnection Feasibility Study Agreement received by Transmission Provider more than [timeline as listed in Transmission Provider’s LGIP] exceeded the Interconnection Feasibility Study deadline in Section 30.2 before the reporting quarter and end of this six month reporting period.

(E) Mean time (in days), Interconnection Feasibility Studies completed within Transmission Provider’s coordinated region during the reporting quarter six month reporting period, from the date when Transmission Provider received the executed Interconnection Feasibility Study Agreement to the date Interconnection Feasibility Study Agreement initiated performance of the Interconnection Feasibility Studies to the date when Transmission Provider provided the completed Interconnection Feasibility Study to the Interconnection Customer.

(F) Percentage of Interconnection Feasibility Studies exceeding timeline as listed in Transmission Provider’s LGIP the Interconnection Feasibility Study deadline in Section 30.2, to complete this reporting quarter six month reporting period, calculated as the sum of 3.6.2.4.3 (B) times [3.6.2.11 (E)] plus 3.6.2.4.3 (C) times [3.6.2.11 (D)] divided by the sum of 3.6.2.4.3 (B) plus 3.6.2.4.3 (C).
Interconnection Study Deadlines

3.5.2.3.1.3 Interconnection Facilities Studies processing time.

(A) Number of Interconnection Requests that had Interconnection Facilities Studies that are completed within Transmission Provider’s coordinated region during the reporting quarter six month reporting period.

(B) Number of Interconnection Requests that had Interconnection Facilities Studies that are completed within Transmission Provider’s coordinated region during the reporting quarter six month reporting period that were completed more than timeline as listed in Transmission Provider’s LGiPI after receipt by Transmission Provider of the Interconnection Customer’s executed Interconnection Facilities Study Agreement after the deadline specified in the Facilities Study Agreement.

(C) At the end of the six month reporting period, the number of active valid Interconnection Requests with ongoing incomplete Interconnection Facilities Studies.

(D) At the end of the reporting quarter six month reporting period, the number of active valid Interconnection Service requests with ongoing incomplete Interconnection Facilities Studies where such Interconnection Requests had executed Interconnection Facilities Study Agreement received by Transmission Provider more than timeline as listed in Transmission Provider’s LGiPI exceeded the deadline specified in the Facilities Study Agreement before the reporting quarter end of the six month reporting period.

(E) Mean time (in days), for Interconnection Facilities Studies completed within Transmission Provider’s coordinated region during the reporting quarter six month reporting period, calculated from the date when Transmission Provider received the executed Interconnection Facilities Study Agreement to the date when Transmission Provider provided the completed Interconnection Facilities Study to the Interconnection Customer.

(F) Percentage of delayed Interconnection Facilities Studies the reporting quarter six month reporting period, calculated as the sum of 3.5.2.3.1(BX.1.3(B) plus 3.5.2.3.1(CX.1.3(D) divided by the sum of 3.5.2.3.1(A)X.1.3(A) plus 3.5.2.3.1(C)X.1.3(C)).

3.5.2.4.1.4 Interconnection Service requests withdrawn from interconnection queue.

(A) Number of Interconnection Service requests New Service Requests valid Interconnection Requests that withdraw withdrawal from Transmission Provider’s Interconnection queue during the reporting quarter six month reporting period.

(B) Number of New Service Interconnection Requests deemed not to be valid requests during the six month reporting period.

(C) Number of Interconnection Service requests New Service Requests valid Interconnection Requests withdrawn from Transmission Provider’s Interconnection queue during the reporting quarter six month reporting period before completion of any interconnection studies or execution of any interconnection study agreements.

(D) Number of Interconnection Service requests New Service requests valid Interconnection Requests withdrawn from Transmission Provider’s Interconnection queue during the reporting quarter six month reporting period before completion of an Interconnection System Impact Study.

(E) Number of Interconnection Service requests New Service Requests valid Interconnection Service requests withdrawn from Transmission Provider’s Interconnection queue during the reporting quarter six month reporting period after the completion of all studies and prior to the execution of an Interconnection Service Agreement, Upgrade Construction Service Agreement or Wholesale Market Participation Agreement.

(F) Number of New Service Requests valid Interconnection Requests withdrawn from the Transmission Provider’s interconnection queue during the six month reporting period after the completion of all studies and prior to the execution of an interconnection Service Agreement, Upgrade Construction Service Agreement or Wholesale Market Participation Agreement or Interconnection Customer’s requests that are eligible for an unexecuted, new interconnection agreement PPA unexecuted.
3.6.3.2 Transmission Provider is required to post on OASIS or its website the measures in paragraph 3.6.2.1(A) through paragraph 3.6.2.4(B) for each calendar quarter six-month reporting period within 30 days of the end of the calendar quarter reporting period. Transmission Provider will keep the quarterly measures posted on OASIS or its website for three calendar years with the first required reporting year to be 2017. If Transmission Provider retains this information on its website, a link to the information must be provided on Transmission Provider’s OASIS site.

3.6.4.3 In the event that any of the values calculated in paragraphs 3.6.2.1(A) through 3.6.2.4(B) exceed 25 percent for two consecutive calendar quarters six-month reporting periods, Transmission Provider will have to comply with the measures below for the next four consecutive calendar quarters six-month reporting periods and must continue reporting this information until Transmission Provider reports four consecutive calendar quarters six-month reporting periods without the values calculated in 3.6.2.1(A) through 3.6.2.4(B) exceeding 25 percent for two consecutive calendar quarters six-month reporting periods:

(i) Transmission Provider must submit a report to the Commission describing the reason for each study or group of clustered studies pursuant to an Interconnection Request that exceeded its deadline (i.e., 45, 90 or 100 days) for completion excluding any allowance for Reasonable Efforts.

(ii) Transmission Provider must describe the reasons for each study delay and any steps taken to remedy these specific issues and, if applicable, prevent such delays in the future. The report must be filed at the Commission within 45 days of the end of the calendar quarter reporting period.

(iii) Transmission Provider shall aggregate the total number of employee-hours and third party consultant hours expended towards interconnection studies within its coordinated region during each of the six-month reporting period and post on OASIS or its website. If Transmission Provider posts this information on its website, a link to the information must be provided on Transmission Provider’s OASIS site. This information is to be posted within 30 days of the end of the calendar quarter-six-month reporting period.
• Requesting Interconnection Service below Generating Facility Capacity
• Provisional Interconnection Service
• Utilization of Surplus Service
• Material Modification and Incorporation of Advanced Technologies