

“Generating Facilities” 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 or Storage As Transmission Asset as defined in this Tariff.

“Storage As Transmission Asset (“SATA”) shall mean energy storage equipment connected to or to be connected to the Transmission System and approved by the PJM Board for inclusion in the RTEP as a Transmission Facility that is part of the Transmission System and is capable of receiving energy from the Transmission System and storing energy for injection to the Transmission System and is operated only to support the Transmission System. SATA is not an Energy Storage Resource; and, therefore, shall not participate in the Transmission Provider’s markets except to the extent necessary to receive energy from the Transmission System and to inject energy into the Transmission System as Transmission Facility.¹

Treatment of Storage as Transmission Asset (SATA).

1. A storage facility proposed as Storage as Transmission Asset (“SATA”) may be considered for inclusion in the RTEP as a transmission enhancement or expansion and may be eligible for cost recovery consistent with Tariff, Schedule 12.
 - a. In addition to the criteria set forth in the Operating Agreement, Schedule 6, section 1.5.8(c)(1), all SATA proposals submitted in the proposal windows also must contain the following information as part of the proposal:
 - i. Direct capital cost;
 - ii. Expected useful life;
 - iii. Equipment replacement schedules and associated life-cycle costs and other ongoing costs to maintain the SATA at its required capability necessary to address the system needs identified, or otherwise comparable to a traditional wires solution; and
 - iv. Other cost and performance information as the Transmission Provider may determine is necessary to compare cost and performance with other proposed solutions to the system needs identified.
 - 1.
 - b. In evaluating the appropriateness of a SATA proposal as an expansion or enhancement to address the posted violations, system conditions, economic constraints, as well as Public Policy Requirements, the Transmission Provider will

¹ Transmission Facility is defined in the OA to mean facilities that: (i) are within the PJM Region; (ii) meet the definition of transmission facilities pursuant to FERC’s Uniform System of Accounts or have been classified as transmission facilities in a ruling by FERC addressing such facilities; and (iii) have been demonstrated to the satisfaction of the Office of the Interconnection to be integrated with the PJM Region transmission system and integrated into the planning and operation of the PJM Region to serve all of the power and transmission customers within the PJM Region.

consider the following factors in evaluating the appropriateness of SATA as proposed to be a transmission solution:

- i. The ability of the proposed SATA to address and solve the posted reliability violation, system condition or economic constraint in all hours that the system need is determined to exist with a life-cycle cost that is comparable to other proposed transmission solutions, or as otherwise required to address the potential system need after consideration of the comparability in system performance to other proposed solutions, including any non-transmission alternatives.
 - ii. The required charge and discharge capability of the proposed SATA to address the identified system need shall be treated as a Transmission Facility. Any excess charge or discharge above the required capability of the SATA shall not be treated as a Transmission Facility. Cost recovery under transmission rates is limited to the cost of the SATA’s charge and discharge capability required to address system needs and will be pro-rated on that basis if a SATA of higher capability is proposed and selected for inclusion in the RTEP.
 - iii. Assurance of sufficient instantaneous energy and/or reactive capability (MWh/MVAr) to charge or discharge energy for any magnitude and duration identified as necessary in the planning study to address the identified system need.
 - iv. Life-cycle cost comparisons, including consideration of the duration that is required to address the system needs, which may be less than the life cycle cost of alternatives that would otherwise be required to address the system needs. Life cycle costs shall include all maintenance costs for the life of the SATA to ensure it continues to address the system needs for which SATA was planned throughout the projected life of the facility.
 - v. Demonstrate operating characteristics necessary to automatically respond to system needs, with the automatic response initiated through sensing of conditions requiring the SATA to be located local to the system need. Additionally, provisions for manual operability of the SATA shall be included in the PJM Manuals.
- c. In order to consider potential impacts by the proposed SATA on New Service Requests in the New Services Queue, Transmission Provider will test the models used to identify reliability criteria violations, system conditions or constraints with and without the SATA operating in the manner required for the SATA to address the identified system needs. If such assessment demonstrates that the necessary operating mode of the proposed SATA would cause the need for additional system

upgrades, the cost of such upgrades driven by the SATA will be included as part of the SATA proposal.

2. Operating Guides associated with SATA will be developed as needed to provide clear guidance with regard to the use of the SATA.
3. Any changes to the location or capability of the SATA included in the RTEP must be proposed through the RTEP planning process.
4. Credits for Real-Time Energy and Operating Reserve Market Sales
 - a. A SATA's market activity will be limited to the charging and discharging necessary for the SATA to meet or be ready to mitigate the identified system needs for which the SATA was included in the RTEP for purposes of cost allocation.
 - b. A SATA receiving cost-based rate recovery that also receives compensation for market-based rate services during asset charging/discharging will be subject to appropriate market revenue crediting for any potential double recovery of costs.