

Exelon Comments – June 20, 2012

(f) The Office of the Interconnection shall determine whether the sponsor that submitted a Long-lead Project proposal recommended for inclusion in the plan is qualified to be the entity designated to construct, own and, unless otherwise provided, finance all or part of its proposed project. In making such determination, the Office of the Interconnection shall consider the following criteria: (i) ~~sponsor is qualified to engage in a state transmission siting process under relevant state law;~~ (ii) ~~sponsor~~ complies with Attachment Q of the Tariff; (iii) ~~sponsor's~~ technical and engineering experience; (iv) ~~sponsors ability to comply with NERC Reliability Standards reliability criteria set forth in section 1.2 of Schedule 6;~~ (v) ~~iii~~ sponsor's previous record regarding construction and maintenance of transmission facilities both inside and outside of the PJM Region; (vi) ~~iii~~ sponsor's capability to adhere to standardized construction, maintenance and operating practices, including but not limited to the sponsor's capability for response to forced outages of transmission facilities, sponsor's capability to perform transmission switching, sponsors capability to provide spare parts for the transmission facilities, sponsor's capability to provide emergency repair of transmission facilities, sponsor's capability to perform a preventative maintenance program on transmission facilities and the sponsor's experience complying with applicable NERC Standards; (vii) ~~iv~~ sponsor's ability to assume liability for major losses resulting from failure of ~~facilities and~~ ~~facilities~~; (viii) ~~vi~~ sponsor's ability to finance the Long-lead Project; and (ix) ~~vii~~ sponsor's experience in acquiring rights of way. Long-lead Project proposals that are recommended for inclusion in the plan shall be designated to the ~~Sponsor~~ sponsor as the entity to construct, own and, unless otherwise provided, finance all or part of the proposed project to the extent the Office of the Interconnection determines the ~~Sponsor~~ sponsor is qualified pursuant to the criteria in this Subsection 1.5.8(f). In the event that the Office of the Interconnection determines that a sponsor of a Long-lead Project proposal included in the recommended plan is not qualified to ~~construct own or finance~~ be a Designated Entity for all or part of the proposed project, the Transmission Owner(s) in whose Zone(s) the Long-lead Project is located shall be designated ~~to construct, own and, unless otherwise provided, finance as the Designated~~ Entity for all or part of the proposed Long-lead Project for which the sponsor is determined not to be qualified, subject to Section 1.7(d) of this Schedule 6.

Comment [A1]: There needs to be a threshold discussion as to the meaning of the term 'sponsor.' Does this refer to the specific corporate entity that will be the owner of the facility or is it broader? This comment goes for this section and subsection (f) for making the designation determination. What if a single purpose entity? Does PJM need to know information on upstream ownership at this stage? If this is a joint venture, it would be important to know the owners.