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February 5, 2019

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426-0001

Re: *PJM Interconnection, L.L.C.*, Docket No. ER19-982-000,
Supplemental Filing

Dear Ms. Bose:

On February 4, 2019, PJM Interconnection, L.L.C. (“PJM”) filed in the referenced docket revisions to the PJM Open Access Transmission Tariff concerning the determination of Incremental Capacity Transfer Rights (the “February 4 Filing”). Due to an oversight, the February 4 Filing included the verification for, but not the text of, the Affidavit of Susan McGill on Behalf of PJM Interconnection, L.L.C. (“McGill Affidavit”). The McGill Affidavit was in final form and verified on February 4, 2019, but the text was inadvertently omitted from Attachment C of the filing. This filing to add the text of the McGill Affidavit to the February 4 Filing does not change the McGill Affidavit as verified on February 4, 2019 in any way, so the date of the McGill Affidavit should not change. Further, this filing does not change or affect in any way the Tariff revisions that were submitted in eTariff in the February 4 Filing.

PJM is serving this supplemental filing on the same persons and in the same manner as it served the February 4 Filing. PJM has served a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM Region by

posting this filing electronically. In accordance with the Commission's regulations,¹ PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: <http://www.pjm.com/documents/ferc-manuals/ferc-filings.aspx>, with a specific link to the newly-filed document, and will send an e-mail on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region² alerting them that this filing has been made by PJM and is available by following such link. PJM also serves the parties listed on the Commission's official service list for this docket. If the document is not immediately available by using the referenced link, the document will be available through the referenced link within twenty-four hours of the filing. Also, a copy of this filing will be available on FERC's eLibrary website located at the following link: <http://www.ferc.gov/docs-filing/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.³ PJM apologizes for any inconvenience caused by the inadvertent omission of the McGill Affidavit's text from the February 4 Filing.

¹ See 18 C.F.R. §§ 35.2(e) & 385.2010(f)(3).

² PJM already maintains, updates, and regularly uses e-mail lists for all PJM Members and affected state commissions.

³ *Electronic Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270, 2008-2013 FERC Stats. & Regs., Regs. Preambles ¶ 31,276 (2008), *final rule*, Order No. 714-A, 147 FERC ¶ 61,115, III FERC Stats. & Regs., Regs. Preambles ¶ 31,356 (2014).

The Honorable Kimberly D. Bose, Secretary
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PJM respectfully requests that the Commission accept this supplement to the February 4 Filing and grant the requested effective date of February 5, 2019. Please contact the undersigned with any questions concerning this filing.

Respectfully submitted,

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*Attorneys for
PJM Interconnection, L.L.C.*

Dated: February 5, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have had served this day the foregoing document on those parties on the official Service List compiled by the Secretary in these proceedings.

Dated at Audubon, Pennsylvania this 5th day of February, 2019.



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Attachment C

Affidavit

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

PJM Interconnection, L.L.C.,
Respondent.

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Docket No. ER19-____-000

**AFFIDAVIT OF SUSAN MCGILL
ON BEHALF OF PJM INTERCONNECTION, L.L.C.**

1. My name is Susan McGill. My business address is 2750 Monroe Blvd., Audubon, Pennsylvania, 19403. I currently serve as Manager, Interconnection Analysis for PJM Interconnection, L.L.C. ("PJM").

2. I am submitting this affidavit on behalf of PJM in support of its filing to revise Section 234.2 of the PJM Open Access Transmission Tariff ("Tariff") to establish a revised timeline for the determination of Incremental Capacity Transfer Rights ("ICTRs") that may result from Customer-Funded Upgrades and add to the Tariff a requirement for New Service Customers to specify up to three Locational Deliverability Areas ("LDAs") for which they would like PJM to study and determine ICTRs, if any, created by their Customer-Funded Upgrades.

3. I joined PJM in 2007 and held various positions within the company before my current position. Prior to joining PJM, I worked for PECO Energy Company in the Transmission and Substations Division as Relay and Protection and Controls Engineer. I have a Bachelors of Science in Electrical Engineering from Drexel University.

4. My affidavit addresses the amount of time it takes my group to perform the analyses to determine ICTRs for every New Service Request with Customer-Funded Upgrades identified as part of the System Impact Study. I also discuss the total number of System Impact Studies PJM has issued over the last ten years, the types of requests that necessitated System Impact Studies, and how many of the New Service Customers that received System Impact Studies elect to proceed to the Facilities Study stage.

5. As was explained in the Affidavit of Mr. Steven R. Herling, filed January 15, 2019, in Docket No. EL18-183-000, determining ICTRs requires determining the capacity emergency transfer limit ("CETL") into an LDA with and without the relevant Customer-Funded Upgrade identified during the System Impact Study. PJM's Load Deliverability test to determine the CETL into an LDA involves two separate analyses. The first analysis examines thermal limits; and the second analysis examines voltage limits.

6. There are 27 LDAs in PJM. In the most extreme case in which we performed the two separate analyses for all 27 LDAs we would have to perform 54 separate analyses for each Customer-Funded Upgrade to determine ICTRs. Each analysis typically takes one to two hours to perform. Thus, the worst-case scenario would involve at least 54 hours, i.e., more than one work week, of analyses to determine ICTRs for one Customer-Funded Upgrade.

7. We can probably avoid having to analyze CETL in all 27 LDAs for each Customer-Funded Upgrade by exercising engineering judgment based on our knowledge of transmission constraints for the various LDAs. For example, if an LDA is geographically and electrically distant from the Customer-Funded Upgrade we are studying, we can judge that the upgrade is not likely to affect that LDA and therefore we would not need to analyze that particular LDA.

8. PJM opens a new interconnection queue every six months, and accordingly has deadlines every six months to issue System Impact Studies for the New Service Requests in a given queue. The next such deadline is February 28, 2019, when PJM must issue 86 System Impact Studies for the AD2 Queue. While some of the studies may not identify any Customer-Funded Upgrades, many, if not most, studies will have one or more Customer-Funded Upgrades that must be evaluated for ICTRs. Even if PJM can limit the number of LDAs to be studied for each Customer-Funded Upgrade in the manner described in Paragraph 7 above, I estimate that it will still take my group approximately one day to determine ICTRs for each Customer-Funded Upgrade. At a rate of one per day for each Customer-Funded Upgrade, it would likely take PJM several additional weeks *after* identification of the Customer Funded Upgrades to determine ICTRs. Given that PJM's processes to date have focused on determination of upgrades (and their initially estimated costs) for the requests in a queue as the last major analysis step before issuance of the System Impact Studies for that queue, holding back the studies until determination of ICTRs means that processing of System Impact Studies for the AD2 Queue will likely be delayed several weeks past the February 28, 2019 deadline.

9. Determining ICTRs for Customer-Funded Upgrades at the System Impact Study stage of the interconnection process also would involve considerable work that would prove unnecessary, considering how many New Service Requests do not proceed beyond the System Impact Study stage. During the last ten years, PJM has issued 2,073 System Impact Studies, in response to 1,817 generation interconnection requests (under Tariff Attachment N), 61 merchant transmission requests (under Tariff Attachment S), 165 long-term, firm transmission service requests (under Tariff Attachment F), 26 incremental auction revenue rights requests (under Tariff Attachment EE § 7.8), and four upgrade requests for merchant network upgrades (under Tariff Attachment EE). Of this population, 1,195 projects were issued a Facilities Study Agreement and only 729 New Service Customers chose to execute that agreement. In other words, almost 40 percent of the requests that receive a System Impact Study do not proceed to the next phase of the interconnection analysis process. As a matter of efficient process management, and given the lesser weight evidently afforded by most generator interconnection customers to ICTRs at that stage of project development, time spent on ICTR determinations for

projects that do not advance past the System Impact Study stage could be better spent on other aspects of the New Service Request administration process.

10. This concludes my affidavit.

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

PJM Interconnection, L.L.C.,
Respondent.

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Docket No. ER19-___-000

VERIFICATION

Susan McGill, being first duly sworn, deposes and states that she is the Susan McGill referred to in the foregoing "Affidavit of Susan McGill on Behalf of PJM Interconnection, L.L.C.," that she has read the same and is familiar with the contents thereof, and that the facts set forth therein are true and correct to the best of her knowledge, information, and belief.



Susan McGill

Subscribed and sworn to before me, the undersigned notary public, this 4th day of February, 2019.



Notary Public

My Commission expires: 12/18/22

