

August 27, 2025

Honorable Debbie-Anne A. Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Re: *PJM Interconnection, L.L.C., Docket Nos. ER25-712-002*  
Compliance Filing

Dear Secretary Reese:

PJM Interconnection, L.L.C. (“PJM”), pursuant to section 206 of the Federal Power Act (“FPA”),<sup>1</sup> hereby submits proposed changes to the PJM Open Access Transmission Tariff (“Tariff”) to comply with the Federal Energy Regulatory Commission’s (“Commission”) directive in its July 28, 2025 order<sup>2</sup> in the above-captioned proceeding to revise Tariff, Part VII, Subpart C, section 306(E)(6). The proposed revision amends PJM’s application rules for Project Developers<sup>3</sup> seeking to submit a Reliability Resource Initiative (“RRI”) Project into Transition Cycle #2 by removing the word “unilaterally” from the requirement that a Generation Project Developer may not take steps to change certain specified parameters of its RRI Project through the conclusion of the 10th consecutive Delivery Year.<sup>4</sup>

As discussed herein, the proposed Tariff revision reflects the Commission’s directive in the July 28 Order while maintaining a clear bar against all fuel type changes to protect

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<sup>1</sup> 16 U.S.C. § 824e.

<sup>2</sup> *PJM Interconnection, L.L.C.*, 192 FERC ¶ 61,085 (2025) (“July 28 Order”).

<sup>3</sup> Capitalized terms not otherwise defined herein shall have the meaning set forth in the Tariff.

<sup>4</sup> July 28 Order at P 129.

against gaming and ensure RRI Projects perform as expected. PJM requests an effective date of December 14, 2024, for the revisions proposed herein.

## **I. BACKGROUND**

On December 13, 2024, PJM filed the RRI to enable a limited reliability-based expansion for Transition Cycle #2 to PJM's resource interconnection queue.<sup>5</sup> On February 11, 2025, the Commission accepted PJM's proposed Tariff revisions, effective December 14, 2024.<sup>6</sup> Requests for rehearing and/or clarification were filed on March 13, 2025 by a number of organizations, including, as relevant here, the Natural Resources Defense Council ("NRDC").<sup>7</sup>

Specifically, NRDC requested that the Commission clarify an alleged inconsistency between PJM's transmittal letter, where PJM stated that RRI projects would be prohibited from changing their fuel types for 10 years, and revised Tariff, Part VII, Subpart C, section 306(E)(6), which prohibits RRI projects from "tak[ing] steps to *unilaterally* change the fuel type" for 10 years.<sup>8</sup> NRDC argued that the Commission should clarify that the approved Tariff changes "do not preclude use of [PJM's] existing multilateral process by a generator to change fuel types,"<sup>9</sup> and that this interpretation would leave the prohibition on unilateral fuel changes by RRI projects redundant and meaningless.

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<sup>5</sup> *PJM Interconnection, L.L.C.*, Tariff Revisions for Reliability Resource Initiative, Docket No. ER25-712-000 (Dec. 13, 2024).

<sup>6</sup> *PJM Interconnection, L.L.C.*, 190 FERC ¶ 61,084, at P 1 (2025) ("RRI Order").

<sup>7</sup> See *PJM Interconnection, L.L.C.*, Request for Clarification or in the Alternative Rehearing of the Natural Resources Defense Council, Docket No. ER25-712-001 (Mar. 13, 2025) ("NRDC Rehearing Request").

<sup>8</sup> July 28 Order at P 126 (quoting NRDC Rehearing Request at 2).

<sup>9</sup> July 28 Order at P 126 (quoting NRDC Rehearing Request at 3).

On March 28, 2025, PJM answered NRDC’s request for clarification regarding the prohibition on RRI resources changing fuel type.<sup>10</sup> PJM answered that it intended to “bar all fuel type changes . . . to protect against gaming and ensure RRI Projects perform as expected.”<sup>11</sup> However, PJM offered that it would, if directed by the Commission, submit a compliance filing to remove the word “unilaterally” from the relevant portions of the Tariff quoted above.<sup>12</sup>

## **II. COMPLIANCE WITH JULY 28 ORDER**

The July 28 Order denied NRDC’s and other protestors’ requests for clarification as to Tariff, Part VII, Subpart C, section 306(E)(6).<sup>13</sup> The Commission found that the best reading of the Tariff was that the language was designed to prohibit late-stage fuel changes by RRI projects, and not as NRDC claimed subjecting them to the same multilateral process for fuel type changes applicable to non-RRI projects.<sup>14</sup> The Commission, however, determined that to avoid any potential for doubt as to the correct interpretation of the revised Tariff it would accept PJM’s offer to submit a filing to strike the word “unilaterally” from the relevant Tariff provisions.<sup>15</sup>

This filing complies with the Commission’s directive to revise Tariff, Part VII, Subpart C, section 306(E)(6) to remove the word “unilaterally” from the Tariff to avoid

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<sup>10</sup> *PJM Interconnection, L.L.C.*, Motion for Leave to Answer, Answer, and Response to NRDC Request for Clarification of PJM Interconnection, L.L.C., Docket No. ER25-712-001 (Mar. 28, 2025) (“PJM March 28, 2025 Answer”).

<sup>11</sup> July 28 Order at P 126 (quoting PJM March 28, 2025 Answer at 13).

<sup>12</sup> PJM March 28, 2025 Answer at 14.

<sup>13</sup> RRI Order at P 129.

<sup>14</sup> RRI Order at P 129.

<sup>15</sup> RRI Order at P 129.

potential for confusion between the Tariff and PJM’s explanation in its December 13, 2024 transmittal letter. The proposed Tariff section reads as follows: “The Generation Project Developer may not take steps to change the fuel type(s), Maximum Facility Output and Capacity Interconnection Rights of its RRI Project from those set forth in the Application through the conclusion of the 10<sup>th</sup> consecutive Delivery Year.”<sup>16</sup>

### **III. ADDITIONAL INFORMATION**

In accordance with section 35.13(a)(1) of the Commission’s regulations, 18 C.F.R. § 35.13(a)(1), PJM provides the following information:

This filing consists of the following:

1. This transmittal letter;
2. Attachment A – Revisions to the PJM Tariff, Part VII Subpart C, section 306(E)(6) (marked); and
3. Attachment B – Revisions to the PJM Tariff, Part VII Subpart C, section 306(E)(6) (clean).

### **IV. EFFECTIVE DATE**

PJM requests an effective date of December 14, 2024, for the revision proposed in this compliance filing to be consistent with the effective date for the RRI revisions accepted in the RRI Order.<sup>17</sup> As noted in the July 28 Order, this compliance revision is merely a clarification to the substantive changes accepted in the RRI Order.<sup>18</sup> The RRI Order concluded that the December 14, 2024 effective date would allow “for the inclusion of RRI projects in Transition

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<sup>16</sup> See proposed Tariff, Part VII, Subpart C, section 306(E)(6).

<sup>17</sup> See RRI Order at P 270

<sup>18</sup> July 28 Order at P 129.

Cycle #2 on a timely basis.”<sup>19</sup> The July 28 Order sustained that finding,<sup>20</sup> and its rationale holds true for the clarification requested by this compliance filing. PJM therefore requests that the Commission grant its requested effective date of December 14, 2024.

## **V. SERVICE**

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,<sup>21</sup> PJM will post a copy of this filing to the Commission filings section of its internet site, located at the following link: <https://www.pjm.com/library/filing-order.aspx>, with a specific link to the newly-filed document, and will send an email on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region<sup>22</sup> alerting them that this filing has been made by PJM today, and is available by following that link.

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<sup>19</sup> RRI Order at P 270.

<sup>20</sup> July 28 Order at P 122.

<sup>21</sup> See 18 C.F.R §§ 35.2(e) and 385.2010(f)(3).

<sup>22</sup> PJM already maintains, updates, and regularly uses email lists for all PJM Members and affected commissions.

## VI. CONCLUSION

For the reasons provided herein, PJM respectfully requests that the Commission accept this compliance filing.

Respectfully submitted,

/s/ Elizabeth P. Trinkle  
Wendy B. Warren  
Elizabeth P. Trinkle  
Wright & Talisman, P.C.  
1200 G Street, N.W., Suite 600  
Washington, D.C. 20005  
(202) 393-1200  
warren@wrightlaw.com  
trinkle@wrightlaw.com

Craig Glazer  
Vice President – Federal Government Policy  
PJM Interconnection, L.L.C.  
1200 G Street, N.W.  
Suite 600  
Washington, D.C. 20005  
(202) 423-4743  
craig.glazer@pjm.com

Christopher B. Holt  
Managing Counsel  
PJM Interconnection, L.L.C.  
2750 Monroe Blvd.  
Audubon, PA 19403  
(610) 666-2368  
christopher.holt@pjm.com

Vasiliki Karandrikas  
Assistant General Counsel  
PJM Interconnection, L.L.C.  
2750 Monroe Blvd.  
Audubon, PA 19403  
(610) 666-4780  
vasiliki.karandrikas@pjm.com

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

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C., this 27th day of August 2025.

/s/ Elizabeth P. Trinkle  
**Attorney for**  
**PJM Interconnection, L.L.C.**

# Attachment A

## Revisions to the PJM Open Access Transmission Tariff

(Marked/Redline Format)



**Tariff, Part VII, Subpart C, section 306**  
**Application Rules**

**A. Application Submission**

A Project Developer or Eligible Customer (collectively, “Applicant”) that seeks to initiate a New Service Request must submit the following information to the Transmission Provider: (i) a Project Developer Applicant electronically submits through the PJM web site, an Application and Studies Agreement (“Application”), a form of which is provided in Tariff, Part IX, Subpart A, (ii) an Eligible Customer Applicant executes a Transmission Provider tendered Application, a form of which is provided in Tariff, Part IX, Subpart A, following the procedures outlined in Tariff, Parts II and III as applicable.

To be considered in a Cycle, Applicant must submit a completed and signed Application, including the required Study Deposit and Readiness Deposit, to Transmission Provider prior to the Cycle’s Application Deadline. Except with regard to Generation Interconnection Requests subject to Tariff, Part VII, Subpart C, section 305(B), Transmission Provider will post a firm Application Deadline for a Cycle at the beginning of Phase II of the immediately prior Cycle, no less than 180 days in advance of the Application Deadline. Only Completed New Service Requests received from Project Developers by the Application Deadline will be considered for the corresponding Cycle. Only Completed Applications received from Eligible Customers by the Application Deadline will be considered for the corresponding Cycle. Completed New Service Requests and Completed Applications shall be assigned a tentative Project Identifier. Transmission Provider will review and validate New Service Requests and the Project Identifier during the Application Phase, prior to Phase I of the corresponding Cycle. Only valid New Service Requests will proceed past the Application Phase.

**1. Generation Interconnection Request Requirements**

For Transmission Provider to consider an Application for a Generation Interconnection Request complete, Applicant must include at a minimum each of the following, as further described in the Application and PJM Manuals:

- a. Provide all Applicant information required in the Application, including parent company information and banking and wire transfer information.
- b. Specify the location of the proposed Point of Interconnection to the Transmission System, including the substation name or the name of the line to be tapped (including the voltage), the estimated distance from the substation endpoints of a line tap, address, and GPS coordinates.
- c. Provide information about the Generating Facility project, including whether it is (1) a proposed new Generating Facility, (2) an increase in capability of an existing Generating Facility, or (3) the replacement of an existing Generating Facility.

- d. Indicate the type of Interconnection Service requested, whether (1) Energy Resource only or (2) Capacity Resource (includes Energy Resource) with Capacity Interconnection Rights.
- e. Specify the project location and provide a detailed site plan.
- f. Submit required evidence of Generating Facility Site Control (including the location of the main step-up transformer), including a certification by an officer or authorized representative of Applicant; and, at Transmission Provider's request, copies of landowner attestations or county recordings.
- g. Provide information about Qualifying Facility status under the Public Utility Regulatory Policies Act, as applicable.
- h. Submit required information and documentation if the Generating Facility will share Applicant's Interconnection Facilities with another Generating Facility.
- i. For a new Generating Facility, specify requested Maximum Facility Output and Capacity Interconnection Rights.
- j. For a requested increase in generation capability of an existing Generating Facility, specify the existing Maximum Facility Output and Capacity Interconnection Rights, and requested increases.
- k. Provide a detailed description of the equipment configuration and electrical design specifications for the Generating Facility.
- l. Specify the fuel type for the Generating Facility; or, in the case of a multi-fuel Generating Facility, the fuel types.
- m. For a multi-fuel Generating Facility, provide a detailed description of the physical and electrical configuration.
- n. If the Generating Facility will include a storage component, provide detailed information about (1) whether and how the storage device(s) will charge using energy from the Transmission System, (2) the primary frequency response operating range for the storage device(s), (3) the MWh stockpile, and (4) the hour class, as applicable.
- o. Specify the proposed date that the project or uprate associated with the Application will be in service.
- p. Provide other relevant information, including whether Applicant or an affiliate has submitted a previous Application for the Generating Facility;

and, if an increase in generation capability, information about existing PJM Service Agreements and associated Queue Position Nos. or Project Identifier Nos.

2. Behind the Meter Generator Application Requirements

In addition to the above requirements for a Generating Facility, in order for Transmission Provider to consider an Application for behind-the-meter generation Interconnection Service complete, Applicant must include at a minimum each of the following, as further described in the Application and PJM Manuals:

- a. Specify gross output, behind the meter load, requested Maximum Facility Output, and requested Capacity Interconnection Rights.
- b. For a requested increase in generation capability of an existing Behind the Meter Generating Facility, specify existing and requested increase in gross output, behind the meter load, Maximum Facility Output, and Capacity Interconnection Rights.

3. Long Term Firm Transmission Service Application Requirements

For Transmission Provider to consider an Application for Long Term Firm Transmission Service complete, Applicant must include at a minimum each of the following, as further described in the Application and PJM Manuals:

- a. Provide all Applicant information required in the Application, including parent company information and banking and wire transfer information.
- b. Specify the locations of the Point(s) of Receipt and Point(s) of Delivery.
- c. Specify the requested Service Commencement Date and term of service.
- d. Specify the transmission capacity requested for each Point of Receipt and each Point of Delivery on the Transmission System.

4. Merchant Transmission Application Requirements

For Transmission Provider to consider an Application for a Transmission Interconnection Request complete, Applicant must include at a minimum each of the following, as further described in the Application and PJM Manuals:

- a. Provide all Applicant information required in the Application, including parent company information and banking and wire transfer information.

- b. Specify the location of the proposed facilities, and the name and description of the substation where Applicant proposes to interconnect or add its facilities.
- c. Specify the proposed voltage and nominal capability of new facilities or increase in capability of existing facilities.
- d. Provide a detailed description of the equipment configuration and electrical design specifications for the project.
- e. Specify the proposed date that the project or increase in capability will be in service.
- f. Specify whether the proposed facilities will be either (1) merchant A.C., (2) Merchant D.C. Transmission Facilities, or (3) Controllable A.C. Merchant Transmission Facilities.
- g. If Merchant D.C. Transmission Facilities or Controllable A.C. Merchant Transmission Facilities, specify whether Applicant elects to receive (1) Firm or Non-Firm Transmission Injection Rights (TIR) and/or Firm or Non-Firm Transmission Withdrawal Rights (TWR) or (2) Incremental Delivery Rights, Incremental Auction Revenue Rights, and/or Incremental Capacity Transfer Rights.
  - i. If Applicant elects to receive TIRs or TWRs, specify (1) total project MWs to be evaluated as Firm (capacity) injection for TIR; (2) total project MWs to be evaluated as Non-firm (energy) injection for TIR; (3) total project MWs to be evaluated as Firm (capacity) withdrawal for TWR; and (4) total project MWs to be evaluated as Non-firm (energy) withdrawal for TWR.
  - ii. If Applicant elects to receive Incremental Delivery Rights, specify the location on the Transmission System where it proposes to receive Incremental Delivery Rights associated with its proposed facilities.
- h. If the proposed facilities will be Controllable A.C. Merchant Transmission Facilities, and provided that Applicant contractually binds itself in its interconnection-related service agreement always to operate its Controllable A.C. Merchant Transmission Facilities in a manner effectively the same as operation of D.C. transmission facilities, the interconnection-related service agreement will provide Applicant with the same types of transmission rights that are available under the Tariff for Merchant D.C. Transmission Facilities. In the Application, Applicant shall represent that, should it execute an interconnection-related service agreement for its project described in the Application, it will agree in the

interconnection-related service agreement to operate its facilities continuously in a controllable mode.

- i. Specify the site where Applicant intends to install its major equipment, and provide a detailed site plan.
- j. Submit required evidence of Site Control for the major equipment, including a certification by an officer or authorized representative of Applicant; and, at Transmission Provider's request, copies of landowner attestations or county recordings.
- k. Provide evidence acceptable to Transmission Provider that Applicant has submitted a valid interconnection request with the adjacent Control Area(s) in which it is interconnecting, as applicable. Applicant shall maintain its queue position(s) with such adjacent Control Area(s) throughout the entire PJM Transmission Interconnection Request process for the relevant PJM Transmission Interconnection Request. If Applicant fails to maintain its queue position(s) with such adjacent Control Area(s) throughout the entire PJM Transmission Interconnection Request process for the relevant PJM Transmission Interconnection Request, the relevant PJM Transmission Interconnection Request shall be deemed to be terminated and withdrawn.

5. Additional Requirements Applicable to All Applications

- a. Study Deposit: For Transmission Provider to consider an Application complete, Transmission Provider must receive from the Applicant the required Study Deposit by wire transfer, the amount of which is based on the size of the project as described below. Applicant's wire transfer must specify the Application reference number to which the Study Deposit corresponds, or Transmission Provider will not review or process the Application.
  - i. Ten percent of the Study Deposit is non-refundable. If Applicant withdraws its New Service Request, or the New Service Request is otherwise deemed rejected or terminated and withdrawn, any unused portion of the non-refundable deposit monies shall be used to fund:
    - (a) Any outstanding monies owed by Applicant in connection with outstanding invoices due to Transmission Provider, Transmission Owner(s), and/or third party contractors, as applicable, as a result of any failure of Applicant to pay actual costs associated with the New Service Request;

- (b) Any restudies required as a result of the rejection, termination, and/or withdrawal of such New Service Request; and/or
  - (c) Any outstanding monies owed by Applicant in connection with outstanding invoices related to other New Service Requests.
- ii. 90 percent of the Study Deposit is refundable, and Transmission Provider shall utilize, in no particular order, the refundable portion of each total deposit amount to cover the following:
  - (a) The cost of the Application review;
  - (b) The dollar amount of Applicant's cost responsibility for the System Impact Study; and
  - (c) If the New Service Request is modified, rejected, terminated, and/or withdrawn, refundable deposit money shall be applied to cover all of the costs incurred by Transmission Provider up to the point of the New Service Request being modified, rejected, terminated and/or withdrawn, and any remaining refundable deposit monies shall be applied to cover:
    - (i) The costs of any restudies required as a result of the modification, rejection, termination, and/or withdrawal of the New Service Request;
    - (ii) Any outstanding monies owed by Applicant in connection with outstanding invoices due to Transmission Provider, Transmission Owner(s), and/or third party contractors, as applicable, as a result of any failure of Applicant to pay actual costs associated with the New Service Request; and/or
    - (iii) Any outstanding monies owed by Applicant in connection with outstanding invoices related to other New Service Requests.
  - (d) If any refundable deposit monies remain after all costs and outstanding monies owed, as described in this section, are covered, such remaining refundable deposit monies shall be returned to Applicant in accordance with the PJM Manuals.

- iii. The Study Deposit is non-binding, and actual study costs may exceed the Study Deposit.
  - (a) Applicant is responsible for, and must pay, all actual study costs.
  - (b) If Transmission Provider sends Applicant notification of additional study costs, then Applicant must either: (i) pay all additional study costs within 20 Business Days of Transmission Provider sending the notification of such additional study costs or (ii) withdraw its New Service Request. If Applicant fails to complete either (i) or (ii), then Transmission Provider shall deem the New Service Request to be terminated and withdrawn.
- iv. The Study Deposit shall be calculated as follows, based on the number of MW energy (e.g., Maximum Facility Output) or MW capacity (e.g., Capacity Interconnection Rights), whichever is greater:
  - (a) Up to 20 MW: \$75,000;
  - (b) Over 20 MW up to 50 MW: \$200,000;
  - (c) Over 50 MW up to 100 MW: \$250,000;
  - (d) Over 100 MW up to 250 MW: \$300,000;
  - (e) Over 250 MW up to 750 MW: \$350,000; and
  - (f) Over 750 MW: \$400,000.
- b. Readiness Deposit: For Transmission Provider to consider an Application complete, Applicant must submit to Transmission Provider the required Readiness Deposit by wire transfer or letter of credit. Applicant's wire transfer or letter of credit must specify the Application reference number to which the Readiness Deposit corresponds, or Transmission Provider will not review or process the Application. Readiness Deposit No. 1 shall be an amount equal to \$4,000 per MW energy (e.g., Maximum Facility Output) or per MW capacity (e.g., Capacity Interconnection Rights), whichever is greater, as specified in the Application.

B. Application Review Phase

- 1. After the close of the Application Deadline, Transmission Provider will begin the Application Review Phase, wherein Transmission Provider reviews Applications

received from Project Developers for completeness and then establishes the validity of such submitted Applications, beginning with a deficiency review, as follows:

- a. Transmission Provider will exercise Reasonable Efforts to inform Applicant of Application deficiencies within 15 Business Days after the Application Deadline.
  - b. Applicant then has 10 Business Days to respond to Transmission Provider's deficiency determination.
  - c. Transmission Provider then will exercise Reasonable Efforts to review Applicant's response within 15 Business Days, and then will either validate or reject the Application.
2. After the close of the Application Deadline, Transmission Provider will begin the Application Review Phase, wherein Transmission Provider reviews Applications received from Eligible Customers for completeness and then establishes the validity of such submitted Applications.
3. Transmission Provider will only review an Application during the Application Review Phase following the Application Deadline for which the Application was submitted and deemed complete, which will extend for 90 days or the amount of time it takes to complete all Application review activities for the relevant Cycle, whichever is greater.
4. During the Application Review Phase, and at least 30 days prior to initiating Phase I of the Cycle, Transmission Provider will post the Phase I Base Case data for review, subject to CEII protocols.
5. In the case of an Application for a Generating Facility, the Application Review Phase will include a Site Control review for the Generating Facility. Specifically, Applicant shall provide Site Control evidence, as set forth in Tariff, Part VII, Subpart A, section 302, for at least a one-year term beginning from the Application Deadline, for 100 percent of the Generating Facility Site including the location of the high-voltage side of the Generating Facility's main power transformer(s). In addition, Applicant shall provide a certification, executed by an officer or authorized representative of Applicant, verifying that the Site Control requirement is met. Further, at Transmission Provider's request, Applicant shall provide copies of landowner attestations or county recordings. The Site Control requirement in the Application includes an acreage requirement for the Generating Facility, as set forth in the PJM Manuals.
6. In the case of an Application for Merchant Transmission, the Application Review Phase will include a Site Control review for the Site of the HVDC converter station(s), phase angle regulator (PAR), and/or variable frequency transformer, as



applicable. Specifically, Applicant shall provide Site Control evidence, as set forth in Tariff, Part VII, Subpart A, section 302, for at least a one-year term beginning from the Application Deadline, for 100 percent of the Site. In addition, Applicant shall provide a certification, executed by an officer or authorized representative of Applicant, verifying that the Site Control requirement is met. Further, at Transmission Provider's request, Applicant shall provide copies of landowner attestations or county recordings.

C. Scoping Meetings

1. During the Application Review Phase, Transmission Provider may hold a single, or several, scoping meetings for projects in each Transmission Owner zone, which are optional and may be waived by Applicants or Transmission Owner.
2. Scoping meetings may include discussion of potential Affected System needs, whereby Transmission Provider may coordinate with Affected System Operators the conduct of required studies.

D. Other Requirements

1. Applicant must submit any claim for Capacity Interconnection Rights from deactivating generation units with the Application, and it must be received by Transmission Provider prior to the Application Deadline.
2. When an Application results in a valid New Service Request, Transmission Provider shall confirm the assigned Project Identifier to the New Service Request, in accordance with Tariff, Part VII, Subpart E, section 315. Applicant and Transmission Provider shall reference the Project Identifier in all correspondence, submissions, wire transfers, documents, and other materials relating to the New Service Request.

E. Additional Provisions Applicable to RRI Projects

1. The provisions of this Tariff, Part VII, Subpart C, section 306(E) apply only to Generation Interconnection Requests that submitted an Application pursuant to Tariff, Part VII, Subpart C, section 305(B). A Generation Project Developer seeking to enter an RRI Project into Transition Cycle #2 must comply with the provisions of Tariff, Part VII, Subpart C, sections 306(A)-(E), and its Application will be subject to the deficiency review provisions set forth in Tariff, Part VII, Subpart C, section 306(B). Failure to provide any information required under Tariff, Part VII, Subpart C, sections 306(A)-(E) will result in the Generation Interconnection Request being deemed terminated and withdrawn. Only Completed New Service Requests received from Generation Project Developers by the Application Deadline set forth in Tariff, Part VII, Subpart C, section 306(E)(2) will be evaluated as RRI Projects.

- a. In addition to and separate from providing the Study Deposit and Readiness Deposit required by Tariff, Part VII, Subpart C, section 306(A)(5), a Generation Project Developer seeking to enter an RRI Project into Transition Cycle #2 must submit to Transmission Provider, and Transmission Provider will not consider an Application complete until the Generation Project Developer submits, the required RRI Deposit by wire transfer or letter of credit. Applicant's wire transfer or letter of credit must specify the Application reference number to which the RRI Deposit corresponds, or Transmission Provider will not review or process the Application. The RRI Deposit shall be an amount equal to \$4,000 per MW energy (e.g., Maximum Facility Output) or per MW capacity (e.g., Capacity Interconnection Rights), whichever is greater, as specified in the Application.
  - i. Transmission Provider shall return the RRI Deposit to a Generation Project Developer if its project is not selected to be an RRI Project pursuant to Tariff, Part VII, Subpart C, sections 306(E)(3) and 306(E)(4).
  - ii. An RRI Project Developer's RRI Deposit shall be 50% at-risk at the start of Phase II of Transition Cycle #2.
  - iii. An RRI Project Developer's RRI Deposit shall be 100% at-risk at the time the RRI Project's Generator Interconnection Agreement or Wholesale Market Participation Agreement is accepted by the Commission and effective.
  - iv. If at any point the RRI Project is withdrawn or the Generator Interconnection Agreement or Wholesale Market Participation Agreement is terminated, the RRI Deposit will be forfeited and Transmission Provider will use the funds in accordance with its use of other nonrefundable study deposits, as set forth in Tariff, Part VII, Subpart C, section 306(A)(5)(a)(i).
  - v. An RRI Project Developer's RRI Deposit will be refunded in full when the RRI Project achieves the commercial operation milestone in its Generator Interconnection Agreement or Wholesale Market Participation Agreement.
2. Transmission Provider shall announce the Application Deadline for RRI Projects at least 30 days in advance of the deadline, with such announcement including the date and time at which the RRI Application window will open and the date and time at which it will close. Transmission Provider shall review the Completed New Service Requests submitted by RRI Projects within the Application Review

Phase for New Service Requests subject to Tariff, Part VII, Subpart C, section 306(A).

3. Fifty projects will be allowed to enter Transition Cycle #2 as RRI Projects. In the event more than 50 projects apply under Tariff, Part VII, Subpart C, section 305(B) and submit valid Applications, Transmission Provider shall apply the criteria and weightings below, and the 50 projects with the highest total points shall be selected. In the event of a tie for 50<sup>th</sup> place, each of those projects will be eligible to enter Transition Cycle #2 as an RRI Project.
4. Any RRI Uprate will be evaluated based only upon the attributes of the portion of the project increasing the capacity of a Base Project.
  - a. Market Impact Criteria (maximum of 65 points).

- i. RRI Unforced Capacity (maximum of 35 points):

Transmission Provider will determine the RRI Unforced Capacity component of the project score as follows.

The table below categorizes each ELCC Class by either Maximum Facility Output or Capacity Interconnection Rights. The applicable RRI ELCC Class Rating is found in the ELCC Class Rating table set forth in Tariff, Part VII, Subpart C, section 306(E)(4)(a)(ii).

For those ELCC Classes categorized as Maximum Facility Output, the RRI Unforced Capacity values shall be equal to the lesser of the resource's Capacity Interconnection Rights or the product of:

- (i) the Maximum Facility Output; and
- (ii) the applicable RRI ELCC Class Rating.

For those ELCC Classes categorized as Capacity Interconnection Rights or for resources for which there is no ELCC Class, the RRI Unforced Capacity values shall be equal to the product of:

- (i) the requested Capacity Interconnection Rights; and
- (ii) the applicable RRI ELCC Class Rating.

ELCC Class	RRI Unforced Capacity Category
4-hr Storage	Capacity Interconnection Rights
6-hr Storage	Capacity Interconnection Rights
8-hr Storage	Capacity Interconnection

	Rights
10-hr Storage	Capacity Interconnection Rights
Coal	Capacity Interconnection Rights
Diesel Utility	Capacity Interconnection Rights
Fixed-Tilt Solar	Maximum Facility Output
Gas Combined Cycle	Capacity Interconnection Rights
Gas Combustion Turbine	Capacity Interconnection Rights
Gas Combustion Turbine Dual Fuel	Capacity Interconnection Rights
Hydro Intermittent	Maximum Facility Output
Landfill Intermittent	Maximum Facility Output
Nuclear	Capacity Interconnection Rights
Offshore Wind	Maximum Facility Output
Onshore Wind	Maximum Facility Output
Steam	Capacity Interconnection Rights
Tracking Solar	Maximum Facility Output

Any project with RRI Unforced Capacity of less than 10 MW shall be deemed ineligible under this Tariff, Part VII, Subpart C, section 306(E), and its Application shall be rejected.

Transmission Provider will use the RRI Unforced Capacity amounts for all projects that seek to enter Transition Cycle #2 as RRI Projects under these procedures to create appropriately sized bins using rules applied to histogram development, which systematically calculate bin widths based on the distribution of values and sample size. Bins are then combined to eliminate those with zero projects and rounded to clean ranges. An RRI Project will receive a base score from 0 to 1 based on the bin into which it falls.

The table below shows an example of bins created in this manner. The size and number of the bins will vary based on the pool of RRI Projects.

Min	Max	Base Score
10	50	0.2
51	100	0.4

101	150	0.6
151	200	0.8
201		1

An Applicant's base score will be multiplied by 35 to determine its score for this category.

ii. RRI ELCC (maximum of 20 points)

Each RRI Project will be assigned an RRI ELCC Class Rating using the table below.

<b>ELCC Class</b>	<b>RRI ELCC Class Rating</b>
4-hr Storage	55%
6-hr Storage	65%
8-hr Storage	67%
10-hr Storage	75%
Coal	84%
Diesel Utility	92%
Fixed-Tilt Solar	5%
Gas Combined Cycle	81%
Gas Combustion Turbine	66%
Gas Combustion Turbine Dual Fuel	80%
Hydro Intermittent	37%
Landfill Intermittent	55%
Nuclear	95%
Offshore Wind	47%
Onshore Wind	28%
Steam	74%
Tracking Solar	7%

The RRI ELCC Class Rating values set forth in the table above will be used only for purposes of the RRI scoring mechanism and may not be reflective of actual ELCC values developed prior to the Base Residual Auction for the relevant Delivery Year in accordance with the Reliability Assurance Agreement.

In the event an RRI Project does not have a published ELCC Class, Transmission Provider shall establish an RRI ELCC Class Rating based on information provided by the Project Developer.

An Applicant will receive a base score of 0 to 1 based on the range in the table below in which its project's RRI ELCC Class Rating falls.

<b>RRI ELCC Class Rating</b>	<b>Base Score</b>
0 - 20%	0.2
21 - 40%	0.4
41 - 60%	0.6
61 - 80%	0.8
81 - 100 %	1

An Applicant's base score will be multiplied by 20 to determine its score for this category.

iii. Location (maximum of 10 points)

An Applicant will receive a base score of 1 for an RRI Project locating in either the Baltimore Gas & Electric Co. or Virginia Electric and Power Company Locational Deliverability Areas. RRI Projects located in other Locational Deliverability Areas will receive a base score of zero.

An Applicant's base score will be multiplied by 10 to determine its score for this category.

The scores for paragraphs (i) through (iii) above shall be added together to derive the score for this section 306(E)(4)(a).

b. Commercial Operation Date Viability Criteria (maximum of 35 points)

i. Commercial Operation Date (maximum of 10 points)

Applicant must submit a critical path construction schedule showing how it will achieve its commercial operation date, which must be set forth in the schedule, and an attestation executed by an officer or authorized representative of the Applicant, verifying the accuracy of the information, including all dates, and certifying that the Applicant will exercise commercially reasonable best efforts to achieve these dates. An Application that does not include an attestation shall not be considered complete, and the Applicant's Generation Interconnection Request shall be rejected.

An Applicant will receive a score of 1 to 0, evaluating the commercial operation date on the submitted critical path construction schedule using the date ranges and associated points below.

<b>Commercial Operation Date</b>		<b>Base Score</b>
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Prior to June 1, 2028		1
June 1, 2028	May 31, 2029	0.75
June 1, 2029	May 31, 2030	0.50
June 1, 2030	May 31, 2031	0.25
June 1, 2031 and beyond		0

An Applicant's base score will be multiplied by 10 to determine its score for the Commercial Operation Date category.

ii. Project Support (maximum of 10 points):

A project will receive 0.25 in base score for each of the following elements it can demonstrate it has completed or can demonstrate real and substantial progress towards achieving it:

- financing, if necessary, or if self-financed, so state;
- permits (fuel, air, water and site);
- fully executed engineering, procurement and construction agreement; and
- signed memorandum for the acquisition of major equipment, invoices for acquired major equipment, or other documentary evidence that major equipment has been procured.

As part of its analysis of Project Support, Transmission Provider shall accept and include in its analysis input from state agencies as to particular permitting and siting issues and timing associated with specific projects.

An Applicant's base score will be multiplied by 10 to determine its score for the Project Support category.

iii. RRI Uprates (maximum of 10 points):

An Applicant must indicate if its project is an RRI Uprate or new project. If the RRI Project is an RRI Uprate, Applicant must specify the Base Project it proposes to uprate. RRI Uprate projects must have the same Project Developer, Interconnection Customer, or Wholesale Market Participant as the Base Project.

An Applicant will receive a score of 1 to 0 based on the uprate level shown in the table below. If the RRI Project is an RRI Uprate, Transmission Provider will check the status of the Base Project as of the date of the Application Deadline for RRI Projects announced pursuant to Tariff, Part VII, Subpart C, section 306(E)(2).

<b>Uprate Level</b>	<b>Base Score</b>
Base Project in Commercial Operation	1
Base Project with Executed and Effective ISA/GIA/WMPA	0.75
Base Project Under Study	0.5
New Project (not an RRI Uprate)	0

An Applicant's base score will be multiplied by 10 to determine its score for the RRI Uprate category.

iv. Headroom (maximum of 5 points)

An Applicant must specify its requested Point of Interconnection, including the PSSE bus number for the Point of Interconnection at which the RRI Project will be modeled. In cases where the RRI Project is proposing to tap an existing transmission line, the bus numbers for each line terminal must be provided along with distances from the Point of Interconnection. Transmission Provider will review and confirm the bus number(s). Transmission Provider will use the project size and the nearest Point of Interconnection to estimate the system impact of the RRI Project.

Applications will be modeled on an interim 2028/29 Transition Cycle #2 base case for summer peak, winter peak, and light load, containing all active projects under study through the Transition Cycle #2. Transmission Provider will perform a high-level direct current ("DC") flowgate analysis with Transmission Provider's generator deliverability software to screen the existing transmission constraints at each project's Point of Interconnection. Transmission Provider will determine the number of transmission facilities with loading above 100% at each voltage level and by project Point of Interconnection. The RRI Projects will be evaluated individually, not as a cohort. A violation score will then be calculated by multiplying the number of violations at each voltage level by the "violation points" shown in the table below and then summed, with the largest value for violations setting the top of the range for purposes of normalizing the violation scores and the violation scores subtracted from 1 so that a higher score reflects more system headroom.

<b>Voltage (kV)</b>	<b>Violation Points</b>
765, 500	1
345, 230	0.75
138, 115, 69	0.5



< 69	0.25
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Transmission Provider will then use the violation scores of the entire RRI Project application pool to create appropriately sized bins. The number and size of the bins will be informed by the same statistical process as described in Tariff, Part VII, Subpart C, section 306(E)(4)(a)(i), and scores of 0 to 1 will be assigned to each bin.

An Applicant's base score will be multiplied by 5 to determine its score for the Headroom category.

The scores for paragraphs (i) through (iv) above shall be added together to derive the score for this section 306(E)(4)(b).

5. Notwithstanding the changes permitted under Tariff, Part VII, Subpart D, sections 309(B) and 311(B)(4), no changes to an RRI Project's Maximum Facility Output or Capacity Interconnection Rights shall be allowed at any point prior to the time the Project Developer enters into a Generation Interconnection Agreement or Wholesale Market Participation Agreement. An RRI Project's Generation Interconnection Agreement or Wholesale Market Participation Agreement must reflect the same Maximum Facility Output and Capacity Interconnection Rights as contained in the Generation Project Developer's Application for consideration of its RRI Project.
6. The Generation Project Developer may not take steps to ~~unilaterally~~ change the fuel type(s), Maximum Facility Output and Capacity Interconnection Rights of its RRI Project from those set forth in the Application through the conclusion of the 10<sup>th</sup> consecutive Delivery Year.
7. Any RRI Project that obtains a final interconnection-related service agreement under this provision shall be required to be offered as a Generation Capacity Resource into the Reliability Pricing Model Auction or committed to a Fixed Resource Requirement Plan for a minimum of ten consecutive Delivery Years from when such resource is first offered into the PJM capacity market or committed to a Fixed Resource Requirement Plan. The initial Delivery Year that such Generation Capacity Resource shall be required to be offered into the Reliability Pricing Model Auction or committed to a Fixed Resource Requirement Plan shall be based on the RRI Project's projected commercial operation date, which will be documented in the Generation Interconnection Agreement or Wholesale Market Participation Agreement. Such Generation Capacity Resource shall continue to be subject to the notice requirements in Tariff, Attachment DD, section 5.5 for the first year that the resource is offered into the Reliability Pricing Model as a Planned Generation Capacity Resource. The categorical exemptions related to the capacity must-offer requirement specified in Tariff, Attachment DD, section 6.6A do not apply to any RRI Project that obtains a Generation

Interconnection Agreement or Wholesale Market Participation Agreement under this Tariff, Part VII, Subpart C, section 306(E)(7).

8. Project Developer of a RRI Project agrees to waive the right to a one-year extension of its milestone dates for any reason as set forth in section 6.5 of the form of Generation Interconnection Agreement (Tariff, Part IX, Subpart B), which will be reflected in the RRI Project's Generation Interconnection Agreement.

# Attachment B

## Revisions to the PJM Open Access Transmission Tariff

(Clean Format)

**Tariff, Part VII, Subpart C, section 306**  
**Application Rules**

**A. Application Submission**

A Project Developer or Eligible Customer (collectively, “Applicant”) that seeks to initiate a New Service Request must submit the following information to the Transmission Provider: (i) a Project Developer Applicant electronically submits through the PJM web site, an Application and Studies Agreement (“Application”), a form of which is provided in Tariff, Part IX, Subpart A, (ii) an Eligible Customer Applicant executes a Transmission Provider tendered Application, a form of which is provided in Tariff, Part IX, Subpart A, following the procedures outlined in Tariff, Parts II and III as applicable.

To be considered in a Cycle, Applicant must submit a completed and signed Application, including the required Study Deposit and Readiness Deposit, to Transmission Provider prior to the Cycle’s Application Deadline. Except with regard to Generation Interconnection Requests subject to Tariff, Part VII, Subpart C, section 305(B), Transmission Provider will post a firm Application Deadline for a Cycle at the beginning of Phase II of the immediately prior Cycle, no less than 180 days in advance of the Application Deadline. Only Completed New Service Requests received from Project Developers by the Application Deadline will be considered for the corresponding Cycle. Only Completed Applications received from Eligible Customers by the Application Deadline will be considered for the corresponding Cycle. Completed New Service Requests and Completed Applications shall be assigned a tentative Project Identifier. Transmission Provider will review and validate New Service Requests and the Project Identifier during the Application Phase, prior to Phase I of the corresponding Cycle. Only valid New Service Requests will proceed past the Application Phase.

**1. Generation Interconnection Request Requirements**

For Transmission Provider to consider an Application for a Generation Interconnection Request complete, Applicant must include at a minimum each of the following, as further described in the Application and PJM Manuals:

- a. Provide all Applicant information required in the Application, including parent company information and banking and wire transfer information.
- b. Specify the location of the proposed Point of Interconnection to the Transmission System, including the substation name or the name of the line to be tapped (including the voltage), the estimated distance from the substation endpoints of a line tap, address, and GPS coordinates.
- c. Provide information about the Generating Facility project, including whether it is (1) a proposed new Generating Facility, (2) an increase in capability of an existing Generating Facility, or (3) the replacement of an existing Generating Facility.

- d. Indicate the type of Interconnection Service requested, whether (1) Energy Resource only or (2) Capacity Resource (includes Energy Resource) with Capacity Interconnection Rights.
- e. Specify the project location and provide a detailed site plan.
- f. Submit required evidence of Generating Facility Site Control (including the location of the main step-up transformer), including a certification by an officer or authorized representative of Applicant; and, at Transmission Provider's request, copies of landowner attestations or county recordings.
- g. Provide information about Qualifying Facility status under the Public Utility Regulatory Policies Act, as applicable.
- h. Submit required information and documentation if the Generating Facility will share Applicant's Interconnection Facilities with another Generating Facility.
- i. For a new Generating Facility, specify requested Maximum Facility Output and Capacity Interconnection Rights.
- j. For a requested increase in generation capability of an existing Generating Facility, specify the existing Maximum Facility Output and Capacity Interconnection Rights, and requested increases.
- k. Provide a detailed description of the equipment configuration and electrical design specifications for the Generating Facility.
- l. Specify the fuel type for the Generating Facility; or, in the case of a multi-fuel Generating Facility, the fuel types.
- m. For a multi-fuel Generating Facility, provide a detailed description of the physical and electrical configuration.
- n. If the Generating Facility will include a storage component, provide detailed information about (1) whether and how the storage device(s) will charge using energy from the Transmission System, (2) the primary frequency response operating range for the storage device(s), (3) the MWh stockpile, and (4) the hour class, as applicable.
- o. Specify the proposed date that the project or uprate associated with the Application will be in service.
- p. Provide other relevant information, including whether Applicant or an affiliate has submitted a previous Application for the Generating Facility;

and, if an increase in generation capability, information about existing PJM Service Agreements and associated Queue Position Nos. or Project Identifier Nos.

2. Behind the Meter Generator Application Requirements

In addition to the above requirements for a Generating Facility, in order for Transmission Provider to consider an Application for behind-the-meter generation Interconnection Service complete, Applicant must include at a minimum each of the following, as further described in the Application and PJM Manuals:

- a. Specify gross output, behind the meter load, requested Maximum Facility Output, and requested Capacity Interconnection Rights.
- b. For a requested increase in generation capability of an existing Behind the Meter Generating Facility, specify existing and requested increase in gross output, behind the meter load, Maximum Facility Output, and Capacity Interconnection Rights.

3. Long Term Firm Transmission Service Application Requirements

For Transmission Provider to consider an Application for Long Term Firm Transmission Service complete, Applicant must include at a minimum each of the following, as further described in the Application and PJM Manuals:

- a. Provide all Applicant information required in the Application, including parent company information and banking and wire transfer information.
- b. Specify the locations of the Point(s) of Receipt and Point(s) of Delivery.
- c. Specify the requested Service Commencement Date and term of service.
- d. Specify the transmission capacity requested for each Point of Receipt and each Point of Delivery on the Transmission System.

4. Merchant Transmission Application Requirements

For Transmission Provider to consider an Application for a Transmission Interconnection Request complete, Applicant must include at a minimum each of the following, as further described in the Application and PJM Manuals:

- a. Provide all Applicant information required in the Application, including parent company information and banking and wire transfer information.

- b. Specify the location of the proposed facilities, and the name and description of the substation where Applicant proposes to interconnect or add its facilities.
- c. Specify the proposed voltage and nominal capability of new facilities or increase in capability of existing facilities.
- d. Provide a detailed description of the equipment configuration and electrical design specifications for the project.
- e. Specify the proposed date that the project or increase in capability will be in service.
- f. Specify whether the proposed facilities will be either (1) merchant A.C., (2) Merchant D.C. Transmission Facilities, or (3) Controllable A.C. Merchant Transmission Facilities.
- g. If Merchant D.C. Transmission Facilities or Controllable A.C. Merchant Transmission Facilities, specify whether Applicant elects to receive (1) Firm or Non-Firm Transmission Injection Rights (TIR) and/or Firm or Non-Firm Transmission Withdrawal Rights (TWR) or (2) Incremental Delivery Rights, Incremental Auction Revenue Rights, and/or Incremental Capacity Transfer Rights.
  - i. If Applicant elects to receive TIRs or TWRs, specify (1) total project MWs to be evaluated as Firm (capacity) injection for TIR; (2) total project MWs to be evaluated as Non-firm (energy) injection for TIR; (3) total project MWs to be evaluated as Firm (capacity) withdrawal for TWR; and (4) total project MWs to be evaluated as Non-firm (energy) withdrawal for TWR.
  - ii. If Applicant elects to receive Incremental Delivery Rights, specify the location on the Transmission System where it proposes to receive Incremental Delivery Rights associated with its proposed facilities.
- h. If the proposed facilities will be Controllable A.C. Merchant Transmission Facilities, and provided that Applicant contractually binds itself in its interconnection-related service agreement always to operate its Controllable A.C. Merchant Transmission Facilities in a manner effectively the same as operation of D.C. transmission facilities, the interconnection-related service agreement will provide Applicant with the same types of transmission rights that are available under the Tariff for Merchant D.C. Transmission Facilities. In the Application, Applicant shall represent that, should it execute an interconnection-related service agreement for its project described in the Application, it will agree in the

interconnection-related service agreement to operate its facilities continuously in a controllable mode.

- i. Specify the site where Applicant intends to install its major equipment, and provide a detailed site plan.
- j. Submit required evidence of Site Control for the major equipment, including a certification by an officer or authorized representative of Applicant; and, at Transmission Provider's request, copies of landowner attestations or county recordings.
- k. Provide evidence acceptable to Transmission Provider that Applicant has submitted a valid interconnection request with the adjacent Control Area(s) in which it is interconnecting, as applicable. Applicant shall maintain its queue position(s) with such adjacent Control Area(s) throughout the entire PJM Transmission Interconnection Request process for the relevant PJM Transmission Interconnection Request. If Applicant fails to maintain its queue position(s) with such adjacent Control Area(s) throughout the entire PJM Transmission Interconnection Request process for the relevant PJM Transmission Interconnection Request, the relevant PJM Transmission Interconnection Request shall be deemed to be terminated and withdrawn.

5. Additional Requirements Applicable to All Applications

- a. Study Deposit: For Transmission Provider to consider an Application complete, Transmission Provider must receive from the Applicant the required Study Deposit by wire transfer, the amount of which is based on the size of the project as described below. Applicant's wire transfer must specify the Application reference number to which the Study Deposit corresponds, or Transmission Provider will not review or process the Application.
  - i. Ten percent of the Study Deposit is non-refundable. If Applicant withdraws its New Service Request, or the New Service Request is otherwise deemed rejected or terminated and withdrawn, any unused portion of the non-refundable deposit monies shall be used to fund:
    - (a) Any outstanding monies owed by Applicant in connection with outstanding invoices due to Transmission Provider, Transmission Owner(s), and/or third party contractors, as applicable, as a result of any failure of Applicant to pay actual costs associated with the New Service Request;



- (b) Any restudies required as a result of the rejection, termination, and/or withdrawal of such New Service Request; and/or
  - (c) Any outstanding monies owed by Applicant in connection with outstanding invoices related to other New Service Requests.
- ii. 90 percent of the Study Deposit is refundable, and Transmission Provider shall utilize, in no particular order, the refundable portion of each total deposit amount to cover the following:
  - (a) The cost of the Application review;
  - (b) The dollar amount of Applicant's cost responsibility for the System Impact Study; and
  - (c) If the New Service Request is modified, rejected, terminated, and/or withdrawn, refundable deposit money shall be applied to cover all of the costs incurred by Transmission Provider up to the point of the New Service Request being modified, rejected, terminated and/or withdrawn, and any remaining refundable deposit monies shall be applied to cover:
    - (i) The costs of any restudies required as a result of the modification, rejection, termination, and/or withdrawal of the New Service Request;
    - (ii) Any outstanding monies owed by Applicant in connection with outstanding invoices due to Transmission Provider, Transmission Owner(s), and/or third party contractors, as applicable, as a result of any failure of Applicant to pay actual costs associated with the New Service Request; and/or
    - (iii) Any outstanding monies owed by Applicant in connection with outstanding invoices related to other New Service Requests.
  - (d) If any refundable deposit monies remain after all costs and outstanding monies owed, as described in this section, are covered, such remaining refundable deposit monies shall be returned to Applicant in accordance with the PJM Manuals.

- iii. The Study Deposit is non-binding, and actual study costs may exceed the Study Deposit.
  - (a) Applicant is responsible for, and must pay, all actual study costs.
  - (b) If Transmission Provider sends Applicant notification of additional study costs, then Applicant must either: (i) pay all additional study costs within 20 Business Days of Transmission Provider sending the notification of such additional study costs or (ii) withdraw its New Service Request. If Applicant fails to complete either (i) or (ii), then Transmission Provider shall deem the New Service Request to be terminated and withdrawn.
- iv. The Study Deposit shall be calculated as follows, based on the number of MW energy (e.g., Maximum Facility Output) or MW capacity (e.g., Capacity Interconnection Rights), whichever is greater:
  - (a) Up to 20 MW: \$75,000;
  - (b) Over 20 MW up to 50 MW: \$200,000;
  - (c) Over 50 MW up to 100 MW: \$250,000;
  - (d) Over 100 MW up to 250 MW: \$300,000;
  - (e) Over 250 MW up to 750 MW: \$350,000; and
  - (f) Over 750 MW: \$400,000.
- b. Readiness Deposit: For Transmission Provider to consider an Application complete, Applicant must submit to Transmission Provider the required Readiness Deposit by wire transfer or letter of credit. Applicant's wire transfer or letter of credit must specify the Application reference number to which the Readiness Deposit corresponds, or Transmission Provider will not review or process the Application. Readiness Deposit No. 1 shall be an amount equal to \$4,000 per MW energy (e.g., Maximum Facility Output) or per MW capacity (e.g., Capacity Interconnection Rights), whichever is greater, as specified in the Application.

B. Application Review Phase

- 1. After the close of the Application Deadline, Transmission Provider will begin the Application Review Phase, wherein Transmission Provider reviews Applications

received from Project Developers for completeness and then establishes the validity of such submitted Applications, beginning with a deficiency review, as follows:

- a. Transmission Provider will exercise Reasonable Efforts to inform Applicant of Application deficiencies within 15 Business Days after the Application Deadline.
  - b. Applicant then has 10 Business Days to respond to Transmission Provider's deficiency determination.
  - c. Transmission Provider then will exercise Reasonable Efforts to review Applicant's response within 15 Business Days, and then will either validate or reject the Application.
2. After the close of the Application Deadline, Transmission Provider will begin the Application Review Phase, wherein Transmission Provider reviews Applications received from Eligible Customers for completeness and then establishes the validity of such submitted Applications.
3. Transmission Provider will only review an Application during the Application Review Phase following the Application Deadline for which the Application was submitted and deemed complete, which will extend for 90 days or the amount of time it takes to complete all Application review activities for the relevant Cycle, whichever is greater.
4. During the Application Review Phase, and at least 30 days prior to initiating Phase I of the Cycle, Transmission Provider will post the Phase I Base Case data for review, subject to CEII protocols.
5. In the case of an Application for a Generating Facility, the Application Review Phase will include a Site Control review for the Generating Facility. Specifically, Applicant shall provide Site Control evidence, as set forth in Tariff, Part VII, Subpart A, section 302, for at least a one-year term beginning from the Application Deadline, for 100 percent of the Generating Facility Site including the location of the high-voltage side of the Generating Facility's main power transformer(s). In addition, Applicant shall provide a certification, executed by an officer or authorized representative of Applicant, verifying that the Site Control requirement is met. Further, at Transmission Provider's request, Applicant shall provide copies of landowner attestations or county recordings. The Site Control requirement in the Application includes an acreage requirement for the Generating Facility, as set forth in the PJM Manuals.
6. In the case of an Application for Merchant Transmission, the Application Review Phase will include a Site Control review for the Site of the HVDC converter station(s), phase angle regulator (PAR), and/or variable frequency transformer, as

applicable. Specifically, Applicant shall provide Site Control evidence, as set forth in Tariff, Part VII, Subpart A, section 302, for at least a one-year term beginning from the Application Deadline, for 100 percent of the Site. In addition, Applicant shall provide a certification, executed by an officer or authorized representative of Applicant, verifying that the Site Control requirement is met. Further, at Transmission Provider's request, Applicant shall provide copies of landowner attestations or county recordings.

C. Scoping Meetings

1. During the Application Review Phase, Transmission Provider may hold a single, or several, scoping meetings for projects in each Transmission Owner zone, which are optional and may be waived by Applicants or Transmission Owner.
2. Scoping meetings may include discussion of potential Affected System needs, whereby Transmission Provider may coordinate with Affected System Operators the conduct of required studies.

D. Other Requirements

1. Applicant must submit any claim for Capacity Interconnection Rights from deactivating generation units with the Application, and it must be received by Transmission Provider prior to the Application Deadline.
2. When an Application results in a valid New Service Request, Transmission Provider shall confirm the assigned Project Identifier to the New Service Request, in accordance with Tariff, Part VII, Subpart E, section 315. Applicant and Transmission Provider shall reference the Project Identifier in all correspondence, submissions, wire transfers, documents, and other materials relating to the New Service Request.

E. Additional Provisions Applicable to RRI Projects

1. The provisions of this Tariff, Part VII, Subpart C, section 306(E) apply only to Generation Interconnection Requests that submitted an Application pursuant to Tariff, Part VII, Subpart C, section 305(B). A Generation Project Developer seeking to enter an RRI Project into Transition Cycle #2 must comply with the provisions of Tariff, Part VII, Subpart C, sections 306(A)-(E), and its Application will be subject to the deficiency review provisions set forth in Tariff, Part VII, Subpart C, section 306(B). Failure to provide any information required under Tariff, Part VII, Subpart C, sections 306(A)-(E) will result in the Generation Interconnection Request being deemed terminated and withdrawn. Only Completed New Service Requests received from Generation Project Developers by the Application Deadline set forth in Tariff, Part VII, Subpart C, section 306(E)(2) will be evaluated as RRI Projects.

- a. In addition to and separate from providing the Study Deposit and Readiness Deposit required by Tariff, Part VII, Subpart C, section 306(A)(5), a Generation Project Developer seeking to enter an RRI Project into Transition Cycle #2 must submit to Transmission Provider, and Transmission Provider will not consider an Application complete until the Generation Project Developer submits, the required RRI Deposit by wire transfer or letter of credit. Applicant's wire transfer or letter of credit must specify the Application reference number to which the RRI Deposit corresponds, or Transmission Provider will not review or process the Application. The RRI Deposit shall be an amount equal to \$4,000 per MW energy (e.g., Maximum Facility Output) or per MW capacity (e.g., Capacity Interconnection Rights), whichever is greater, as specified in the Application.
  - i. Transmission Provider shall return the RRI Deposit to a Generation Project Developer if its project is not selected to be an RRI Project pursuant to Tariff, Part VII, Subpart C, sections 306(E)(3) and 306(E)(4).
  - ii. An RRI Project Developer's RRI Deposit shall be 50% at-risk at the start of Phase II of Transition Cycle #2.
  - iii. An RRI Project Developer's RRI Deposit shall be 100% at-risk at the time the RRI Project's Generator Interconnection Agreement or Wholesale Market Participation Agreement is accepted by the Commission and effective.
  - iv. If at any point the RRI Project is withdrawn or the Generator Interconnection Agreement or Wholesale Market Participation Agreement is terminated, the RRI Deposit will be forfeited and Transmission Provider will use the funds in accordance with its use of other nonrefundable study deposits, as set forth in Tariff, Part VII, Subpart C, section 306(A)(5)(a)(i).
  - v. An RRI Project Developer's RRI Deposit will be refunded in full when the RRI Project achieves the commercial operation milestone in its Generator Interconnection Agreement or Wholesale Market Participation Agreement.
2. Transmission Provider shall announce the Application Deadline for RRI Projects at least 30 days in advance of the deadline, with such announcement including the date and time at which the RRI Application window will open and the date and time at which it will close. Transmission Provider shall review the Completed New Service Requests submitted by RRI Projects within the Application Review

Phase for New Service Requests subject to Tariff, Part VII, Subpart C, section 306(A).

3. Fifty projects will be allowed to enter Transition Cycle #2 as RRI Projects. In the event more than 50 projects apply under Tariff, Part VII, Subpart C, section 305(B) and submit valid Applications, Transmission Provider shall apply the criteria and weightings below, and the 50 projects with the highest total points shall be selected. In the event of a tie for 50<sup>th</sup> place, each of those projects will be eligible to enter Transition Cycle #2 as an RRI Project.
4. Any RRI Uprate will be evaluated based only upon the attributes of the portion of the project increasing the capacity of a Base Project.
  - a. Market Impact Criteria (maximum of 65 points).

- i. RRI Unforced Capacity (maximum of 35 points):

Transmission Provider will determine the RRI Unforced Capacity component of the project score as follows.

The table below categorizes each ELCC Class by either Maximum Facility Output or Capacity Interconnection Rights. The applicable RRI ELCC Class Rating is found in the ELCC Class Rating table set forth in Tariff, Part VII, Subpart C, section 306(E)(4)(a)(ii).

For those ELCC Classes categorized as Maximum Facility Output, the RRI Unforced Capacity values shall be equal to the lesser of the resource's Capacity Interconnection Rights or the product of:

- (i) the Maximum Facility Output; and
- (ii) the applicable RRI ELCC Class Rating.

For those ELCC Classes categorized as Capacity Interconnection Rights or for resources for which there is no ELCC Class, the RRI Unforced Capacity values shall be equal to the product of:

- (i) the requested Capacity Interconnection Rights; and
- (ii) the applicable RRI ELCC Class Rating.

ELCC Class	RRI Unforced Capacity Category
4-hr Storage	Capacity Interconnection Rights
6-hr Storage	Capacity Interconnection Rights
8-hr Storage	Capacity Interconnection

	Rights
10-hr Storage	Capacity Interconnection Rights
Coal	Capacity Interconnection Rights
Diesel Utility	Capacity Interconnection Rights
Fixed-Tilt Solar	Maximum Facility Output
Gas Combined Cycle	Capacity Interconnection Rights
Gas Combustion Turbine	Capacity Interconnection Rights
Gas Combustion Turbine Dual Fuel	Capacity Interconnection Rights
Hydro Intermittent	Maximum Facility Output
Landfill Intermittent	Maximum Facility Output
Nuclear	Capacity Interconnection Rights
Offshore Wind	Maximum Facility Output
Onshore Wind	Maximum Facility Output
Steam	Capacity Interconnection Rights
Tracking Solar	Maximum Facility Output

Any project with RRI Unforced Capacity of less than 10 MW shall be deemed ineligible under this Tariff, Part VII, Subpart C, section 306(E), and its Application shall be rejected.

Transmission Provider will use the RRI Unforced Capacity amounts for all projects that seek to enter Transition Cycle #2 as RRI Projects under these procedures to create appropriately sized bins using rules applied to histogram development, which systematically calculate bin widths based on the distribution of values and sample size. Bins are then combined to eliminate those with zero projects and rounded to clean ranges. An RRI Project will receive a base score from 0 to 1 based on the bin into which it falls.

The table below shows an example of bins created in this manner. The size and number of the bins will vary based on the pool of RRI Projects.

Min	Max	Base Score
10	50	0.2
51	100	0.4

101	150	0.6
151	200	0.8
201		1

An Applicant's base score will be multiplied by 35 to determine its score for this category.

ii. RRI ELCC (maximum of 20 points)

Each RRI Project will be assigned an RRI ELCC Class Rating using the table below.

<b>ELCC Class</b>	<b>RRI ELCC Class Rating</b>
4-hr Storage	55%
6-hr Storage	65%
8-hr Storage	67%
10-hr Storage	75%
Coal	84%
Diesel Utility	92%
Fixed-Tilt Solar	5%
Gas Combined Cycle	81%
Gas Combustion Turbine	66%
Gas Combustion Turbine Dual Fuel	80%
Hydro Intermittent	37%
Landfill Intermittent	55%
Nuclear	95%
Offshore Wind	47%
Onshore Wind	28%
Steam	74%
Tracking Solar	7%

The RRI ELCC Class Rating values set forth in the table above will be used only for purposes of the RRI scoring mechanism and may not be reflective of actual ELCC values developed prior to the Base Residual Auction for the relevant Delivery Year in accordance with the Reliability Assurance Agreement.

In the event an RRI Project does not have a published ELCC Class, Transmission Provider shall establish an RRI ELCC Class Rating based on information provided by the Project Developer.

An Applicant will receive a base score of 0 to 1 based on the range in the table below in which its project's RRI ELCC Class Rating falls.



<b>RRI ELCC Class Rating</b>	<b>Base Score</b>
0 - 20%	0.2
21 - 40%	0.4
41 - 60%	0.6
61 - 80%	0.8
81 - 100 %	1

An Applicant's base score will be multiplied by 20 to determine its score for this category.

iii. Location (maximum of 10 points)

An Applicant will receive a base score of 1 for an RRI Project locating in either the Baltimore Gas & Electric Co. or Virginia Electric and Power Company Locational Deliverability Areas. RRI Projects located in other Locational Deliverability Areas will receive a base score of zero.

An Applicant's base score will be multiplied by 10 to determine its score for this category.

The scores for paragraphs (i) through (iii) above shall be added together to derive the score for this section 306(E)(4)(a).

b. Commercial Operation Date Viability Criteria (maximum of 35 points)

i. Commercial Operation Date (maximum of 10 points)

Applicant must submit a critical path construction schedule showing how it will achieve its commercial operation date, which must be set forth in the schedule, and an attestation executed by an officer or authorized representative of the Applicant, verifying the accuracy of the information, including all dates, and certifying that the Applicant will exercise commercially reasonable best efforts to achieve these dates. An Application that does not include an attestation shall not be considered complete, and the Applicant's Generation Interconnection Request shall be rejected.

An Applicant will receive a score of 1 to 0, evaluating the commercial operation date on the submitted critical path construction schedule using the date ranges and associated points below.

<b>Commercial Operation Date</b>		<b>Base Score</b>
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Prior to June 1, 2028		1
June 1, 2028	May 31, 2029	0.75
June 1, 2029	May 31, 2030	0.50
June 1, 2030	May 31, 2031	0.25
June 1, 2031 and beyond		0

An Applicant's base score will be multiplied by 10 to determine its score for the Commercial Operation Date category.

ii. Project Support (maximum of 10 points):

A project will receive 0.25 in base score for each of the following elements it can demonstrate it has completed or can demonstrate real and substantial progress towards achieving it:

- financing, if necessary, or if self-financed, so state;
- permits (fuel, air, water and site);
- fully executed engineering, procurement and construction agreement; and
- signed memorandum for the acquisition of major equipment, invoices for acquired major equipment, or other documentary evidence that major equipment has been procured.

As part of its analysis of Project Support, Transmission Provider shall accept and include in its analysis input from state agencies as to particular permitting and siting issues and timing associated with specific projects.

An Applicant's base score will be multiplied by 10 to determine its score for the Project Support category.

iii. RRI Uprates (maximum of 10 points):

An Applicant must indicate if its project is an RRI Uprate or new project. If the RRI Project is an RRI Uprate, Applicant must specify the Base Project it proposes to uprate. RRI Uprate projects must have the same Project Developer, Interconnection Customer, or Wholesale Market Participant as the Base Project.

An Applicant will receive a score of 1 to 0 based on the uprate level shown in the table below. If the RRI Project is an RRI Uprate, Transmission Provider will check the status of the Base Project as of the date of the Application Deadline for RRI Projects announced pursuant to Tariff, Part VII, Subpart C, section 306(E)(2).

<b>Uprate Level</b>	<b>Base Score</b>
Base Project in Commercial Operation	1
Base Project with Executed and Effective ISA/GIA/WMPA	0.75
Base Project Under Study	0.5
New Project (not an RRI Uprate)	0

An Applicant's base score will be multiplied by 10 to determine its score for the RRI Uprate category.

iv. Headroom (maximum of 5 points)

An Applicant must specify its requested Point of Interconnection, including the PSSE bus number for the Point of Interconnection at which the RRI Project will be modeled. In cases where the RRI Project is proposing to tap an existing transmission line, the bus numbers for each line terminal must be provided along with distances from the Point of Interconnection. Transmission Provider will review and confirm the bus number(s). Transmission Provider will use the project size and the nearest Point of Interconnection to estimate the system impact of the RRI Project.

Applications will be modeled on an interim 2028/29 Transition Cycle #2 base case for summer peak, winter peak, and light load, containing all active projects under study through the Transition Cycle #2. Transmission Provider will perform a high-level direct current ("DC") flowgate analysis with Transmission Provider's generator deliverability software to screen the existing transmission constraints at each project's Point of Interconnection. Transmission Provider will determine the number of transmission facilities with loading above 100% at each voltage level and by project Point of Interconnection. The RRI Projects will be evaluated individually, not as a cohort. A violation score will then be calculated by multiplying the number of violations at each voltage level by the "violation points" shown in the table below and then summed, with the largest value for violations setting the top of the range for purposes of normalizing the violation scores and the violation scores subtracted from 1 so that a higher score reflects more system headroom.

<b>Voltage (kV)</b>	<b>Violation Points</b>
765, 500	1
345, 230	0.75
138, 115, 69	0.5

< 69	0.25
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Transmission Provider will then use the violation scores of the entire RRI Project application pool to create appropriately sized bins. The number and size of the bins will be informed by the same statistical process as described in Tariff, Part VII, Subpart C, section 306(E)(4)(a)(i), and scores of 0 to 1 will be assigned to each bin.

An Applicant's base score will be multiplied by 5 to determine its score for the Headroom category.

The scores for paragraphs (i) through (iv) above shall be added together to derive the score for this section 306(E)(4)(b).

5. Notwithstanding the changes permitted under Tariff, Part VII, Subpart D, sections 309(B) and 311(B)(4), no changes to an RRI Project's Maximum Facility Output or Capacity Interconnection Rights shall be allowed at any point prior to the time the Project Developer enters into a Generation Interconnection Agreement or Wholesale Market Participation Agreement. An RRI Project's Generation Interconnection Agreement or Wholesale Market Participation Agreement must reflect the same Maximum Facility Output and Capacity Interconnection Rights as contained in the Generation Project Developer's Application for consideration of its RRI Project.
6. The Generation Project Developer may not take steps to change the fuel type(s), Maximum Facility Output and Capacity Interconnection Rights of its RRI Project from those set forth in the Application through the conclusion of the 10<sup>th</sup> consecutive Delivery Year.
7. Any RRI Project that obtains a final interconnection-related service agreement under this provision shall be required to be offered as a Generation Capacity Resource into the Reliability Pricing Model Auction or committed to a Fixed Resource Requirement Plan for a minimum of ten consecutive Delivery Years from when such resource is first offered into the PJM capacity market or committed to a Fixed Resource Requirement Plan. The initial Delivery Year that such Generation Capacity Resource shall be required to be offered into the Reliability Pricing Model Auction or committed to a Fixed Resource Requirement Plan shall be based on the RRI Project's projected commercial operation date, which will be documented in the Generation Interconnection Agreement or Wholesale Market Participation Agreement. Such Generation Capacity Resource shall continue to be subject to the notice requirements in Tariff, Attachment DD, section 5.5 for the first year that the resource is offered into the Reliability Pricing Model as a Planned Generation Capacity Resource. The categorical exemptions related to the capacity must-offer requirement specified in Tariff, Attachment DD, section 6.6A do not apply to any RRI Project that obtains a Generation

Interconnection Agreement or Wholesale Market Participation Agreement under this Tariff, Part VII, Subpart C, section 306(E)(7).

8. Project Developer of a RRI Project agrees to waive the right to a one-year extension of its milestone dates for any reason as set forth in section 6.5 of the form of Generation Interconnection Agreement (Tariff, Part IX, Subpart B), which will be reflected in the RRI Project's Generation Interconnection Agreement.