



**Generation Interconnection  
Combined Feasibility and System Impact  
Study Report  
for  
Queue Project AF1-199  
AVON LAKE 10 138 KV  
4 MW Capacity / 4 MW Energy**

January 2020

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## 1 Introduction

This Combined Feasibility and System Impact Study has been prepared in accordance with the PJM Open Access Transmission Tariff, 36.2, as well as the Feasibility Study Agreement between, the Interconnection Customer (IC), and PJM Interconnection, LLC (PJM), Transmission Provider (TP). The Interconnected Transmission Owner (ITO) is American Transmission Systems, Incorporated (ATSI).

## 2 Preface

The intent of the feasibility study is to determine a plan, with ballpark cost and construction time estimates, to connect the subject generation to the PJM network at a location specified by the Interconnection Customer. The Interconnection Customer may request the interconnection of generation as a capacity resource or as an energy-only resource. As a requirement for interconnection, the Interconnection Customer may be responsible for the cost of constructing: (1) Direct Connections, which are new facilities and/or facilities upgrades needed to connect the generator to the PJM network, and (2) Network Upgrades, which are facility additions, or upgrades to existing facilities, that are needed to maintain the reliability of the PJM system.

In some instances a generator interconnection may not be responsible for 100% of the identified network upgrade cost because other transmission network uses, e.g. another generation interconnection, may also contribute to the need for the same network reinforcement. Cost allocation rules for network upgrades can be found in PJM Manual 14A, Attachment B. The possibility of sharing the reinforcement costs with other projects may be identified in the feasibility study, but the actual allocation will be deferred until the impact study is performed.

PJM utilizes manufacturer models to ensure the performance of turbines is properly captured during the simulations performed for stability verification and, where applicable, for compliance with low voltage ride through requirements. Turbine manufacturers provide such models to their customers. The list of manufacturer models PJM has already validated is contained in Attachment B of Manual 14G. Manufacturer models may be updated from time to time, for various reasons such as to reflect changes to the control systems or to more accurately represent the capabilities turbines and controls which are currently available in the field. Additionally, as new turbine models are developed, turbine manufacturers provide such new models which must be used in the conduct of these studies. PJM needs adequate time to evaluate the new models in order to reduce delays to the System Impact Study process timeline for the Interconnection Customer as well as other Interconnection Customers in the study group. Therefore, PJM will require that any Interconnection Customer with a new manufacturer model must supply that model to PJM, along with a \$10,000 fully refundable deposit, no later than three (3) months prior to the starting date of the System Impact Study (See Section 4.3 for starting dates) for the Interconnection Request which shall specify the use of the new model. The Interconnection Customer will be required to submit a completed dynamic model study request form (Attachment B-1 of Manual 14G) in order to document the request for the study.

The Feasibility Study estimates do not include the feasibility, cost, or time required to obtain property rights and permits for construction of the required facilities. The project developer is responsible for the right of way, real estate, and construction permit issues. For properties currently owned by Transmission Owners, the costs may be included in the study.

### 3 General

The Interconnection Customer (IC), has proposed an increase to an existing Oil generating facility located in Lorain County, Avon Lake, Ohio. Note that this project is an increase to the Interconnection Customer's existing Avon Lake Facility, which will share the same property and connection point. This projects requests an increase to the installed capability of Avon Lake Unit 10 of 4.0 MW with 4.0 MW of this output being recognized by PJM as Capacity. The installed facilities will have a total capability of 36 MW with 25 MW of this output being recognized by PJM as Capacity. The proposed in-service date for this project is October 1, 2019. This study does not imply a TO commitment to this in-service date.

<b>Queue Number</b>	<b>AF1-199</b>
<b>Project Name</b>	AVON LAKE 10 138 KV
<b>State</b>	Ohio
<b>County</b>	Lorain
<b>Transmission Owner</b>	ATSI
<b>MFO</b>	36
<b>MWE</b>	4
<b>MWC</b>	4
<b>Fuel</b>	Oil
<b>Basecase Study Year</b>	2023

#### 3.1 Point of Interconnection

AF1-199 will interconnect with the ATSI transmission system as an uprate to the Avon Lake; Unit 10 at the Avon Lake Generation Station 13.8 kV substation.

#### 3.2 Cost Summary

The AF1-199 project will be responsible for the following costs:

Description	Total Cost
<b>Attachment Facilities</b>	\$
<b>Direct Connection Network Upgrade</b>	\$10,000
<b>Non Direct Connection Network Upgrades</b>	\$
<b>Total Costs</b>	\$10,000

In addition, the AF1-199 project may be responsible for a contribution to the following costs

Description	Total Cost
<b>System Upgrades</b>	\$0

Cost allocations for these upgrades will be provided in the System Impact Study Report.

The costs provided above exclude the Contribution in Aid of Construction (“CIAC”) Federal Income Tax Gross Up charge. If, at a future date, it is determined that the CIAC Federal Income Tax Gross charge is required, the Transmission Owner shall be reimbursed by the Interconnection Customer for such taxes.

#### 4 Transmission Owner Scope of Work

The project is an uprate to an existing generator currently connected to the Avon Lake 138 kV substation.

#### 5 Attachment Facilities

There is no Attachment Facility scope of work required.

#### 6 Direct Connection Cost Estimate

The total preliminary cost estimate for the Direct Connection work is given in the table below. These costs do not include CIAC Tax Gross-up.

Description	Total Cost
Engineering Review	\$ 10,000
<b>Total Direct Connection Facility Costs</b>	<b>\$ 10,000</b>

#### 7 Non-Direct Connection Cost Estimate

There is no Non-Direct Connection scope of work required.

#### 8 Schedule

Based on the scope of work for the Attachment Facilities and the Direct and/or Non-Direct Connection facilities, it is expected to take a minimum of 1 months after the signing of an Interconnection Construction Service Agreement to complete the installation. This includes the requirement for the IC to make a preliminary payment that compensates FE for the first three months of the engineering design work that is related to the construction of the interconnection substation. This assumes that there will be no environmental issues with any of the new properties associated with this project, that there will be no delays in acquiring the necessary permits for implementing the defined direct connection and network upgrades, and that all transmission system outages will be allowed when requested.

The schedule for the required Network Impact Reinforcements will be more clearly identified in future study phases. The estimate elapsed time to complete each of the required reinforcements is identified in the “System Reinforcements” section of the report.

## 9 Transmission Owner Analysis

### 9.1 Power Flow Analysis

FE performed an analysis of its underlying transmission <100 kV system. The AF1-199 project did not contribute to any overloads on the FE transmission system.

### 9.2 Stability Analysis

None.

## 10 Interconnection Customer Requirements

### System Protection

The IC must design its Customer Facilities in accordance with all applicable standards, including the standards in FE's "Requirements for Transmission Connected Facilities" document located at:

<http://www.pjm.com/planning/design-engineering/to-tech-standards/private-firstenergy.aspx>.

Preliminary Protection requirements will be provided as part of the Facilities Study. Detailed Protection Requirements will be provided once the project enters the construction phase.

### Compliance Issues and Interconnection Customer Requirements

The proposed Customer Facilities must be designed in accordance with FE's "Requirements for Transmission Connected Facilities" document located at: <http://www.pjm.com/planning/design-engineering/to-tech-standards/private-firstenergy.aspx>.

The IC will also be required to meet all PJM, ReliabilityFirst, and NERC reliability criteria and operating procedures for standards compliance. For example, the IC will need to properly locate and report the over and under voltage and over and under frequency system protection elements for its units as well as the submission of the generator model and protection data required to satisfy the PJM and ReliabilityFirst audits. Failure to comply with these requirements may result in a disconnection of service if the violation is found to compromise the reliability of the FE system.

### Power Factor Requirements

The existing 32 MW portion of the Customer Facility shall retain its existing ability to maintain a power factor of at least 0.95 leading (absorbing VARs) to 0.90 lagging (supplying VARs) measured at the Point of Interconnection. The increase of 4 MW to the Customer Facilities associated with the AF1-199 project shall be designed with the ability to maintain a Power Factor of at least 1.0 (unity) to 0.90 lagging (supplying VARs) measured at the Point of Interconnection.

For updates to synchronous generators, a reactive capability analysis is required for the System Impact Study (or combined studies) using D-curves supplied by the IC to ensure the machines will have sufficient VAR output at the higher MW output. This analysis is not required during the feasibility study.

## 11 Revenue Metering and SCADA Requirements

### 11.1 PJM Requirements

The Interconnection Customer will be required to install equipment necessary to provide Revenue Metering (KWH, KVARH) and real time data (KW, KVAR) for IC's generating Resource. See PJM Manuals M-01 and M-14D, and PJM Tariff Section 8 of Attachment O.

### 11.2 ATSI Requirements

The IC will be required to comply with all FE revenue metering requirements for generation interconnection customers which can be found in FE's "Requirements for Transmission Connected Facilities" document located at: <http://www.pjm.com/planning/design-engineering/to-tech-standards/private-firstenergy.aspx>

## 12 Network Impacts

The Queue Project AF1-199 was evaluated as a 4.0 MW (Capacity 4.0 MW) injection as an uprate to the Avon Lake; Unit 10 at the Avon Lake Generation Station 13.8 kV substation in the ATSI area. Project AF1-199 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF1-199 was studied with a commercial probability of 100%. Potential network impacts were as follows:

# Summer Peak Load Flow

### **12.1 Generation Deliverability**

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

None

### **12.2 Multiple Facility Contingency**

(Double Circuit Tower Line, Fault with a Stuck Breaker, and Bus Fault contingencies for the full energy output)

None

### **12.3 Contribution to Previously Identified Overloads**

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

None

### **12.4 Potential Congestion due to Local Energy Deliverability**

PJM also studied the delivery of the energy portion of this interconnection request. Any problems identified below are likely to result in operational restrictions to the project under study. The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed below. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.

None

# Short Circuit

### 13 Short Circuit

The following Breakers are overdutied:

None.

# Affected Systems

## **14 Affected Systems**

### **14.1 LG&E**

LG&E Impacts to be determined during later study phases (as applicable).

### **14.2 MISO**

MISO Impacts to be determined during later study phases (as applicable).

### **14.3 TVA**

TVA Impacts to be determined during later study phases (as applicable).

### **14.4 Duke Energy Progress**

Duke Energy Progress Impacts to be determined during later study phases (as applicable).

### **14.5 NYISO**

NYISO Impacts to be determined during later study phases (as applicable).

15 Attachment 1 – One Line

Avon Lake 138 kV Substation

