



**Generation Interconnection  
Feasibility Study Report  
for  
Queue Project AF1-254  
MILNOR-HUYETTS 34.5 KV  
12 MW Capacity / 20 MW Energy**

January 2020

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## 1 Introduction

This Feasibility 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 West Penn Power (West Penn Power - Part of Allegheny Power System, Inc. (APS)).

## 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.

The Interconnection Customer seeking to interconnect a wind or solar generation facility shall maintain meteorological data facilities as well as provide that meteorological data which is required per Schedule H to the Interconnection Service Agreement and Section 8 of Manual 14D.

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 a Solar generating facility located in Franklin County, Pennsylvania. The installed facilities will have a total capability of 20 MW with 12 MW of this output being recognized by PJM as Capacity. The proposed in-service date for this project is May 1, 2022. This study does not imply a TO commitment to this in-service date.

<b>Queue Number</b>	<b>AF1-254</b>
<b>Project Name</b>	MILNOR-HUYETTS 34.5 KV
<b>State</b>	Pennsylvania
<b>County</b>	Franklin
<b>Transmission Owner</b>	West Penn Power (APS)
<b>MFO</b>	20
<b>MWE</b>	20
<b>MWC</b>	12
<b>Fuel</b>	Solar
<b>Basecase Study Year</b>	2023

#### 3.1 Point of Interconnection

The interconnection of the project at the Primary POI will be accomplished by tapping the Milnor - Huyetts 34.5 kV line and constructing a one span tap. The transmission line tap will be located approximately 0.3 miles from Milnor substation and 9.0 miles from Huyetts substation. The IC will be responsible for acquiring all easements, properties, and permits that may be required to construct both the new interconnection line tap and the associated Attachment facilities. The project will also require non-direct upgrades at Halfway and Milnor substations.

Attachment 1 shows a one-line diagram of the proposed primary direct connection facilities for the AF1-254 generation project to connect to the FirstEnergy (“FE”) transmission system. Attachment 2 provides the proposed location for the point of interconnection. IC will be responsible for constructing all of the facilities on its side of the POI, including the Attachment facilities which connect the generator to the FE transmission system.

#### 3.2 Cost Summary

The AF1-254 project will be responsible for the following costs:

<b>Description</b>	<b>Total Cost</b>
Attachment Facilities	\$32,500
Direct Connection Network Upgrade	\$65,200
Non-Direct Connection Network Upgrades	\$96,400
<b>Total Costs</b>	<b>\$194,100</b>

In addition, the AF1-254 project may be responsible for a contribution to the following costs

Description	Total Cost
System Upgrades	\$375,000

The Feasibility Study is used to make a preliminary determination of the type and scope of Attachment Facilities, Local Upgrades, and Network Upgrades that will be necessary to accommodate the Interconnection Request and to provide the Interconnection Customer a preliminary estimate of the time that will be required to construct any necessary facilities and upgrades and the Interconnection Customer’s cost responsibility. The System Impact Study provides refined and comprehensive estimates of cost responsibility and construction lead times for new facilities and system upgrades. Facilities Studies will include, commensurate with the degree of engineering specificity as provided in the Facilities Study Agreement, good faith estimates of the cost, determined in accordance with Section 217 of the Tariff,

- (a) to be charged to each affected New Service Customer for the Facilities and System Upgrades that are necessary to accommodate this queue project;
- (b) the time required to complete detailed design and construction of the facilities and upgrades; and
- (c) a description of any site-specific environmental issues or requirements that could reasonably be anticipated to affect the cost or time required to complete construction of such facilities and upgrades.

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.

The required Attachment Facilities and Direct and/or Non-Direct Connection work for the interconnection of the AF1-254 generation project to the FE Transmission System is detailed in the following sections. The associated one-line with the generation project Attachment Facilities and the Primary Direct and Non-Direct Connection facilities are shown in Attachment 1.

#### 4 Transmission Owner Scope of Work

The interconnection of the project at the Primary POI will be accomplished by tapping the Milnor - Huyetts 34.5 kV line and constructing a one span tap. The transmission line tap will be located approximately 0.3 miles from Milnor substation and 9.0 miles from Huyetts substation. The IC will be responsible for acquiring all easements, properties, and permits that may be required to construct both the new interconnection line tap and the associated Attachment facilities. The project will also require non-direct upgrades at Halfway and Milnor substations.

#### 5 Attachment Facilities

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

Description	Total Cost
Install one 34.5 kV tap switch and construct a single span tap to customer's substation. Install 34.5 kV metering in customer's facilities.	\$32,500
Review drawings and provide nameplates for customer substation.	\$63,200
<b>Total Attachment Facility Costs</b>	<b>\$95,700</b>

#### 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
<b>Total Direct Connection Facility Costs</b>	<b>\$0</b>

#### 7 Non-Direct Connection Cost Estimate

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

Description	Total Cost
Update relay settings at Halfway	\$16,600
Update relay settings at Milnor	\$16,600
Construct 34.5 kV tap with two 34.5 kV line switches.	\$65,200
<b>Total Non-Direct Connection Facility Costs</b>	<b>\$98,400</b>

## 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 12 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. At the Primary POI, the AF1-254 project contributes to overloads on the FE <100 kV system as shown below. The estimated costs of system reinforcements necessary to mitigate these overloads is \$375,000.

Contingency Description	Overloaded Element	Rating (MVA)	% Loading After AF1-254	Final % Loading	AF1-254 MW Contrib.	FE Comments/Reinforcements
Milnor – AF1-254 Tap 34.5 kV Line	AA1-092 Tap - Huyetts 34.5 kV Line	25.8	108.37	108.37	20	Replace terminal equipment. Time Estimate: 9 months Cost : \$187,500
Huyetts – AA1-092 Tap 34.5 kV Line	AF1-254 Tap - Milnor 34.5 kV Line	25.8	108.37	108.37	20	Replace terminal equipment. Time Estimate: 9 months Cost : \$187,500
Halfway – Cinetic Tap 34.5 kV Line			101.02	101.02	14.98	
Cinetic Tap – Fedex Tap 34.5 kV Line			100.74	100.74	14.98	
Base Case			102.53	102.53	14.58	
			22.2	102.53	102.53	
<b>TOTAL COST</b>						<b>\$375,000</b>

## 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>. In particular, the IC is responsible for the following:

1. The purchase and installation of a fully rated 34.5 kV circuit breaker to protect the AF1-254 generator lead line. A single circuit breaker must be used to protect this line; if the project has several GSU transformers, the individual GSU transformer breakers cannot be used to protect this line.
2. The purchase and installation of the minimum required FE generation interconnection relaying and control facilities. This includes over/under voltage protection, over/under frequency protection, and zero sequence voltage protection relays.
3. The purchase and installation of supervisory control and data acquisition ("SCADA") equipment to provide information in a compatible format to the FE Transmission System Control Center.
4. Compliance with the FE and PJM generator power factor and voltage control requirements.
5. The execution of a back-up service agreement to serve the customer load supplied from the AF1-254 generation project metering point when the units are out-of-service. This assumes the intent of the IC is to net the generation with the load.

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 IC shall design its non-synchronous Customer Facility with the ability to maintain a power factor of at least 0.95 leading (absorbing VARs) to 0.95 lagging (supplying VARs) measured at the high-side of the facility substation transformer(s) connected to the FE transmission system.

## 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 FirstEnergy 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 – Primary POI

The Queue Project AF1-254 was evaluated as a 20.0 MW (Capacity 12.0 MW) injection at the Milnor to Huyetts 34.5 kV line in the APS area. Project AF1-254 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF1-254 was studied with a commercial probability of 53%. 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

## 13 System Reinforcements

ID	Index	Facility	Upgrade Description	Cost
AF1-254-L1	N/A	AA1-092 Tap - Huyetts 34.5 kV Line	WP-AF1-F-0016 : Replace relay at Milnor Project Type : FAC Cost : \$187,500 Time Estimate : 9.0 Months	\$187,500
AF1-254-L2	N/A	AF1-254 Tap - Milnor 34.5 kV Line	WP-AF1-F-0020 : Replace relay at Milnor Project Type : FAC Cost : \$187,500 Time Estimate : 9.0 Months	\$187,500
AF1-254-L3	N/A	AF1-254 Tap - Milnor 34.5 kV Line	WP-AF1-F-0020 : Replace relay at Milnor Project Type : FAC Cost : \$187,500 Time Estimate : 9.0 Months	\$187,500
AF1-254-L4	N/A	AF1-254 Tap - Milnor 34.5 kV Line	WP-AF1-F-0020 : Replace relay at Milnor Project Type : FAC Cost : \$187,500 Time Estimate : 9.0 Months	\$187,500
AF1-254-L5	N/A	AF1-254 Tap - Milnor 34.5 kV Line	WP-AF1-F-0020 : Replace relay at Milnor Project Type : FAC Cost : \$187,500 Time Estimate : 9.0 Months	\$187,500
			TOTAL COST	\$375,000

# 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).

# Short Circuit

## 15 Short Circuit

The following Breakers are overdutied:

None.

## 16 Network Impacts – Secondary POI

The Queue Project AF1-254 was evaluated as a 20.0 MW (Capacity 12.0 MW) injection at the Milnor 34.5 kV substation in the APS area. Project AF1-254 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF1-254 was studied with a commercial probability of 53%. Potential network impacts were as follows:

# Summer Peak Load Flow

### **16.1 Generation Deliverability**

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

None

### **16.2 Multiple Facility Contingency**

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

None

### **16.3 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

### **16.4 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

# Affected Systems

## 17 Affected Systems

### 17.1 LG&E

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

### 17.2 MISO

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

### 17.3 TVA

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

### 17.4 Duke Energy Progress

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

### 17.5 NYISO

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

# Short Circuit

## 18 Short Circuit

The following Breakers are overdutied:

None.

**19 Attachment 1 – One Line**