



**Generation Interconnection
Feasibility Study Report
for
Queue Project AF2-187
BROOKSIDE-CLOVERDALE 138 KV
78 MW Capacity / 130 MW Energy**

July 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 American Transmission Systems, Inc. (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.

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.

An Interconnection Customer with a proposed new Customer Facility that has a Maximum Facility Output equal to or greater than 100 MW shall install and maintain, at its expense, phasor measurement units (PMUs). See Section 8.5.3 of Appendix 2 to the Interconnection Service Agreement as well as section 4.3 of PJM Manual 14D for additional information.

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 Wayne County, Ohio. The installed facilities will have a total capability of 130 MW with 78 MW of this output being recognized by PJM as Capacity. The proposed in-service date for this project is June 30, 2023. This study does not imply a TO commitment to this in-service date.

Queue Number	AF2-187
Project Name	BROOKSIDE-CLOVERDALE 138 KV
State	Ohio
County	Wayne
Transmission Owner	ATSI
MFO	130
MWE	130
MWC	78
Fuel	Solar
Basecase Study Year	2023

Any new service customers who can feasibly be commercially operable prior to June 1st of the basecase study year are required to request interim deliverability analysis.

4 Point of Interconnection

AF2-187 will interconnect with the ATSI transmission system tapping the Brookside to Cloverdale 138 kV line.

4.1 Primary POI

The interconnection of the project at the Primary POI will be accomplished by constructing a new 138 kV three (3) breaker ring bus substation and looping the Brookside-Cloverdale 138 kV line into the new station. The new substation will be located approximately 24 miles from Brookside Substation. The IC will be responsible for acquiring all easements, properties, and permits that may be required to construct both the new interconnection switching station and the associated facilities. The IC will also be responsible for the rough grade of the property and an access road to the proposed three-breaker ring bus site. The project will also require Non-Direct Connection upgrades at Brookside Substation and Cloverdale Substation.

Attachment 1 shows a one-line diagram of the proposed primary Direct Connection facilities for the AF2-187 generation project to connect to the FirstEnergy (“FE”) Transmission System. The IC will be responsible for constructing the facilities on its side of the POI, including the Attachment Facilities which connect the generator to the FE Transmission System’s Direct Connection facilities.

4.2 Secondary POI

The interconnection of the project at a Secondary POI can be accomplished by constructing a new 138 kV three (3) breaker ring bus substation and looping the Cloverdale-East Wooster 138 kV line into the new station. The new substation would be located approximately 13 miles from Cloverdale Substation. A full scope of work or estimated cost is not provided for the proposed Secondary POI.

5 Cost Summary

The AF2-187 project will be responsible for the following costs:

Description	Total Cost
Total Physical Interconnection Costs	\$7,360,000
Total System Network Upgrade Costs	\$0
Total Costs	\$7,360,000

This cost excludes a Federal Income Tax Gross Up charges. This tax may or may not be charged based on whether this project meets the eligibility requirements of IRS Notice 88-129. If at a future date it is determined that the Federal Income Tax Gross charge is required, the Transmission Owner shall be reimbursed by the Interconnection Customer for such taxes.

Cost allocations for any System Upgrades will be provided in the System Impact Study Report.

6 Transmission Owner Scope of Work

6.1 Primary POI

The interconnection of the project at the Primary POI will be accomplished by constructing a new 138 kV three (3) breaker ring bus substation and looping the Brookside-Cloverdale 138 kV line into the new station. The new substation will be located approximately 24 miles from Brookside Substation. The IC will be responsible for acquiring all easements, properties, and permits that may be required to construct both the new interconnection switching station and the associated facilities. The IC will also be responsible for the rough grade of the property and an access road to the proposed three-breaker ring bus site. The project will also require Non-Direct Connection upgrades at Brookside Substation and Cloverdale Substation.

Attachment 1 shows a one-line diagram of the proposed primary Direct Connection facilities for the AF2-187 generation project to connect to the FirstEnergy (“FE”) Transmission System. The IC will be responsible for constructing the facilities on its side of the POI, including the Attachment Facilities which connect the generator to the FE Transmission System’s Direct Connection facilities.

6.2 Secondary POI

The interconnection of the project at a Secondary POI can be accomplished by constructing a new 138 kV three (3) breaker ring bus substation and looping the Cloverdale-East Wooster 138 kV line into the new station. The new substation would be located approximately 13 miles from Cloverdale Substation. A full scope of work or estimated cost is not provided for the proposed Secondary POI.

The total physical interconnection costs for the Primary POI is given in the table below:

Description	Total Cost
Attachment Facilities at the new 138 kV interconnection switchyard including metering	\$285,000
New 138 kV Interconnection Switchyard – 3 breaker ring bus	\$5,375,000
Brookside-Cloverdale 138 kV remote terminal and communication work	\$1,700,000
Total Physical Interconnection Costs	\$7,360,000

This cost excludes a Federal Income Tax Gross Up charges. This tax may or may not be charged based on whether this project meets the eligibility requirements of IRS Notice 88-129. If at a future date it is determined that the Federal Income Tax Gross charge is required, the Transmission Owner shall be reimbursed by the Interconnection Customer for such taxes.

7 Schedule

Based on the scope of work for the interconnection facilities, it is expected to take a minimum of **24 months** after the signing of an Interconnection Construction Service Agreement and construction kickoff call 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.

8 Transmission Owner Analysis

8.1 Power Flow Analysis

FE performed an analysis of its underlying transmission <100 kV system. The AF2-187 project did not contribute to any overloads on the FE Transmission System.

9 Interconnection Customer Requirements

9.1 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.

9.2 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 138 kV circuit breaker to protect the AF2-187 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 AF2-187 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 Transmission System.

9.3 Power Factor Requirements

The IC shall design its Solar-powered 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.

10 Revenue Metering and SCADA Requirements

10.1 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.

10.2 Meteorological Data Reporting Requirements

The solar generation facility shall provide the Transmission Provider with site-specific meteorological data including:

- Back Panel temperature (Fahrenheit)
- Irradiance (Watts/meter²)
- Ambient air temperature (Fahrenheit) – (Accepted, not required)
- Wind speed (meters/second) – (Accepted, not required)

Wind direction (decimal degrees from true north) – (Accepted, not required)

10.3 Interconnected Transmission Owner Requirements

The IC will be required to comply with all Interconnected Transmission Owner's revenue metering requirements for generation interconnection customers located at the following link:

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

11 Summer Peak - Load Flow Analysis - Primary POI

The Queue Project AF2-187 was evaluated as a 130.0 MW (Capacity 78.0 MW) injection tapping the Brookside to Cloverdale 138 kV line in the ATSI area. Project AF2-187 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF2-187 was studied with a commercial probability of 53.0 %. Potential network impacts were as follows:

11.1 Generation Deliverability

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

None

11.2 Multiple Facility Contingency

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

None

11.3 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

11.4 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

11.5 System Reinforcements

None

11.6 Flow Gate Details - Primary POI

The following indices contain additional information about each facility presented in the body of the report. For each index, a description of the flowgate and its contingency was included for convenience. The intent of the indices is to provide more details on which projects/generators have contributions to the flowgate in question. All New Service Queue Requests, through the end of the Queue under study, that are contributors to a flowgate will be listed in the indices. Please note that there may be contributors that are subsequently queued after the queue under study that are not listed in the indices. Although this information is not used "as is" for cost allocation purposes, it can be used to gage the impact of other projects/generators. It should be noted the project/generator MW contributions presented in the body of the report are Full MW Impact contributions which are also noted in the indices column named "Full MW Impact", whereas the loading percentages reported in the body of the report, take into consideration the PJM Generator Deliverability Test rules such as commercial probability of each project as well as the ramping impact of "Adder" contributions. The MW Impact found and used in the analysis is shown in the indices column named "Gendeliv MW Impact".

None

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11.7 Queue Dependencies

The Queue Projects below are listed in one or more indices for the overloads identified in your report. These projects contribute to the loading of the overloaded facilities identified in your report. The percent overload of a facility and cost allocation you may have towards a particular reinforcement could vary depending on the action of these earlier projects. The status of each project at the time of the analysis is presented in the table. This list may change as earlier projects withdraw or modify their requests.

None

11.8 Contingency Descriptions - Primary POI

None

12 Short Circuit Analysis - Primary POI

To be performed in the System Impact phase.

13 Summer Peak - Load Flow Analysis - Secondary POI

The Queue Project AF2-187 was evaluated as a 130.0 MW (Capacity 78.0 MW) injection tapping the East Wooster to Cloverdale 138 kV line in the ATSI area. Project AF2-187 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF2-187 was studied with a commercial probability of 53.0 %. Potential network impacts were as follows:

13.1 Generation Deliverability

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

None

13.2 Multiple Facility Contingency

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

None

13.3 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

13.4 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

13.5 Flow Gate Details - Secondary POI

The following indices contain additional information about each facility presented in the body of the report. For each index, a description of the flowgate and its contingency was included for convenience. The intent of the indices is to provide more details on which projects/generators have contributions to the flowgate in question. All New Service Queue Requests, through the end of the Queue under study, that are contributors to a flowgate will be listed in the indices. Please note that there may be contributors that are subsequently queued after the queue under study that are not listed in the indices. Although this information is not used "as is" for cost allocation purposes, it can be used to gage the impact of other projects/generators. It should be noted the project/generator MW contributions presented in the body of the report are Full MW Impact contributions which are also noted in the indices column named "Full MW Impact", whereas the loading percentages reported in the body of the report, take into consideration the PJM Generator Deliverability Test rules such as commercial probability of each project as well as the ramping impact of "Adder" contributions. The MW Impact found and used in the analysis is shown in the indices column named "Gendeliv MW Impact".

None

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13.6 Contingency Descriptions - Secondary POI

None

14 Affected Systems

14.1 NYISO

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

14.2 MISO

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

15 Attachment 1: One Line Diagram