

***Generation Interconnection
Feasibility Study Report***

For

***PJM Generation Interconnection Request
Queue Position W3-151***

Philipsburg 34.5kV

February 2011

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. 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 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.

General

The Interconnection Customer (IC), has proposed a solar generating facility located in Philipsburg, New Jersey (Attachment 1). The installed facilities will have a total capability of 16 MW with 6.08 MW of this output being recognized by PJM as capacity. This means that the remaining 9.92 MW will be curtailable should a system reliability constraint be declared by either PJM or FE when peak load conditions occur. At all other times the Project will be subject to the economic and reliability dispatch procedures as defined in the PJM Manuals. This includes the potential for a curtailment of the entire Project output during off peak periods. The proposed in-service date for this W3-151 Project is March 15, 2012.

Point of Interconnection

W3-151 will interconnect with the Jersey Central Power & Light system at a 12kV circuit from the Morris Park substation.

First Energy Analysis and Impacts

As shown on Attachment 2, the connection point for the W3-151 Project will be a tap of the Morris Park - Ingersoll Rand (T124) 34.5 kV line. From this point Jersey Central will build a new 4.65 mile tapped connection to the W3-151 Project site. Given that the Jersey Central 115/230 kV right of way corridor is fully utilized, Interconnection Customer will need to acquire all new right of way from the Morris Park - Ingersoll Rand (T124) 34.5 kV line tap to the point where the Morris Park - Merrill Creek Tap (S919-1) 115 kV line crosses a nearby road. In addition, Jersey Central has made commitment to a preceding Interconnection project to over build on a section of the Distribution system extending along Harmony Station Road. Therefore, the Interconnection Customer will need to acquire a new right of way extending from Harmony Station Road. Overall the Interconnection Customer will need to acquire 2.95 miles of new right of way for the radial tapped connection line. From the end of this new circuit, Jersey Central will overbuild a new 1.7 mile 34.5 kV line that will be overbuilt on an existing 12.5 kV Distribution circuit right-of way to a point that is adjacent to the W3-151 Project. Since Jersey Central will own, operate and maintain this new radial attachment line, the point of interconnection will be at the boundary of the W3-151 Project site as identified on Attachment 2.

In summary, Attachment 3 shows a conceptual one-line diagram of the Direct Connection facilities that will be required for the W3-151 Project. As indicated, it will be studied as an 16 MW injection to the Jersey Central 34.5 kV system of the Morris Park - Ingersoll Rand (T124) 34.5 kV line. Disconnect switches will be needed on the radial tap pole as well as the adjacent poles in addition to a circuit breaker and switch on the system side of the generator step-up transformer. The Interconnection Customer will be responsible for acquiring all permits that may be required for the 34.5 kV line tap and the 2.95 mile right-of way adjacent to the Morris Park - Merrill Creek Tap (S919-1) 115 kV line, the permits to construct this new line, the permits for the 34.5 kV line extension line that will be overbuilt on the Jersey Central Distribution circuit, and constructing, owning and operating all facilities on its side of the point of interconnection. A summary of the FE facilities required for the W3-151 Project Direct Connection and their cost estimate is shown on Attachment 4.

In accordance with PJM protocol, the Interconnection Customer has selected a secondary connection option for the W3-151 Project. While the point of connection will be the same, an alternative path from the project site to the attachment pole has been identified. As defined by the Interconnection Customer and shown on Attachment 2, Jersey Central will build a new 3.5 mile tapped 34.5 kV connection to the W3-151 Project site for this option. Overall 1.45 miles of the proposed W3-151 Project connection line will require new right of way and 2.05 miles can be overbuilt on existing Distribution circuits. As with the primary option, the Interconnection Customer will be responsible for acquiring all permits that may be required for the 34.5 kV line tap, the 1.45 miles of new right-of way that will be needed and the permits to construct the new line, the permits for the 34.5 kV line extension line that will be overbuilt on the Jersey Central Distribution circuit, and constructing all facilities on its side of the point of interconnection. Since the primary and secondary points of interconnection are identical, no separate report of study results is necessary. By PJM process, no cost estimates will be provided.

Power Flow Analysis

A Power Flow study was conducted to determine the reliability impact of the proposed W3-151 Project on the FE Transmission System. This study was completed using a 2012 summer peak load power flow that contains a detailed representation of the Jersey Central transmission networks in the area of the proposed W3-151 Project. Note that the year 2012 was chosen for study rather than 2015 since this is the first summer period when the W Queue solar projects are scheduled for service. The findings and the recommendations from this analysis are based on a contingency review that was performed to identify the facility loadings and/or voltage conditions that violate the Reliability *First*, PJM or FE Planning Criteria and are attributable to this project.

The results of the FE analysis show that there are no network upgrades required for the deliverability of the W3-151 Project generation capacity to the Jersey Central and PJM transmission systems. There also are no reinforcements defined for previous projects for which this project will have an impact. However, there are numerous solar generation projects proposed in the vicinity of the W3-151 Project that can cause system constraints. In addition, there is the potential for high voltage during light load periods and voltage criteria violations due to swings in the MW output of the cumulative attached solar generation. A conclusion of this analysis is therefore that the curtailment of the W3-151 Project output can be expected at times to maintain the Jersey Central system reliability within the NERC, Regional and FE operations and planning standards.

Note that a further conclusion of this study is that it will be mandatory for the W3-151 Project to have a range of dynamic reactive capability that supports its operation from a .95 lead to .90 lag power factor. Without a continuous regulation, the FE studies show that the addition of solar projects can cause voltage swings as their output oscillates with moving clouds and system voltages that can exceed the established limits. Should the Interconnection Customer fail to provide a dynamic reactive capability from the W3-151 Project for any reason once interconnected, the Jersey Central and/or PJM Dispatchers may need to take action to curtail both the energy and capacity portion of its output to prevent a non-compliance with voltage criteria.

Short Circuit and Dynamics Analysis

In accordance with the Interconnection process, a short circuit analysis will not be conducted by PJM since the W3-151 Project connection is to the 34.5 kV system. Therefore, the FE Protection staff conducted a short circuit review of the project connection. An assumption of this study was that solar generation projects will contribute no appreciable fault current to the breakers on the FE transmission system. As defined by EPRI: "Inverters are generally designed to limit fault currents to 130% or less of rated current. Thus they can usually be disregarded when conducting fault studies."¹ Based on this fact, the results of the

FE analysis showed that no FE circuit breaker will exceed its interrupting capability with the implementation of the W3-151 Project. Therefore no circuit breaker reinforcements will be required.

¹ EPRI Document TR-111490 "Integration of Distributed Resources in Electric Utility Distribution Systems: Distribution System Behavior Analysis for Suburban Feeder", published November 1998, page 62

Note that stability studies will be conducted by the PJM staff should this project proceed to the System Impact Study stage of the Interconnection process.

System Protection Analysis

An analysis was conducted to assess the impact of the W3-151 Project on the system protection requirements in the area. The results of this review have identified the following:

Under the assumption that the W3-151 Project generation will not supply fault current to the Jersey Central transmission system, there will be no protection upgrades needed for the Morris Park - Ingersoll Rand (T124) 34.5 kV line. However, the W3-151 Project will be required to have two independent high-speed zones of protection to sense and clear faults on the interconnection transformer.

Fault current at the W3-151 Project 34.5 kV tap of the Morris Park - Ingersoll Rand (T124) 34.5 kV line adjacent to the Morris Park 34.5 kV substation are listed below.

Three Phase: 15,713 amperes
Line to Ground: 4,130 amperes

Thevenin Impedances in ohms:
Positive Sequence: $0.138 + j 1.260$
Zero Sequence: $1.948 + j11.776$

Fault current at the W3-151 Project 34.5 kV point of connection 4.65 miles from the tap of the Morris Park - Ingersoll Rand (T124) 34.5 kV line are listed below.

Three Phase: 4,347 amperes
Line to Ground: 1,767 amperes

Thevenin Impedances in ohms:
Positive Sequence: $1.229 + j 4.415$
Zero Sequence: $5.993 + j23.922$

These values are for the current system configuration. Any system changes in the area could have a significant impact on these values. It will be a Interconnection Customer responsibility to make any protection upgrades required should this occur.

Due to the low magnitude of maximum fault current expected for the 16 MW connection, either a fuse can be added on the line or fault indicators installed off of the tap. A cost estimate of the FE system protection facilities required for the W3-151 is included on Attachment 4.

Metering

The Interconnection Customer will be required to comply with all FE Revenue Metering Requirements for Generation Interconnection Customers. These FE requirements are detailed on Attachment 5 to this report.

Compliance Issues

The proposed interconnection facilities must be designed in accordance with the FirstEnergy “Requirements for Transmission Connected Facilities” located at:

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

This includes the provision of a reactive power capability sufficient to maintain a composite power delivery for the facility at the interconnection point at a power factor between .95 leading (absorbing 5.26 MVAR) and .90 lagging (producing 7.75 MVAR). If this capability cannot be provided by the solar units, a dynamic device such as a STATCOM or SVC must be installed at the W3-151 Project substation at the Interconnection Customer’s cost.

The Interconnection Customer will be responsible for following the requirements of the “FirstEnergy Wholesale Generation Interconnection (WGI) Manual” and the “FE Approved Vendors and Contractors” documents which are also located at the above link. In addition, the Interconnection Customer will be required to meet all PJM, Reliability*First* and NERC reliability criteria and operating procedures for standards compliance. For example, the Developer 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 Reliability*First* 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.

FE Facility Upgrades and Costs

The results of the FE analysis shows that no planning criteria violations are attributable to the addition of the W3-151 Project for the conditions studied. Therefore the conclusion is that no transmission or distribution reinforcements will be required to provide the requested service.

Interconnection Customer Requirements

In addition to the FE facilities, the Interconnection Customer will also be responsible for meeting all criteria as specified in the applicable sections of the "FE Requirements for Transmission Connected Facilities" document. Since the W3-151 Project will be connected to the 34.5 kV network, the Interconnection Customer will also be responsible for compliance with the FirstEnergy “Technical Requirements for the Interconnection of Parallel-Operated Generation to the FirstEnergy Distribution System”. This includes but is not limited to the following:

1. 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.
2. The purchase and installation of the standard voice grade (analog) telephone line and associated conduit between the telephone company source and the meter socket or enclosure.
3. A compliance with the FE and PJM generator power factor and voltage control requirements. Note that the W3-151 Project will need to absorb reactive power at the point of

interconnection to minimize the voltage change should the units rapidly reduce their output or trip off line

4. The execution of a back-up service agreement to serve the customer load supplied from the 34.5 kV interconnection substation when the units are out-of-service. This assumes the intent of the Interconnection Customer is to net the generation with the station load.
5. Any complaints from other customers (e.g. flicker complaints) will have to be corrected by the Interconnection Customer. Correction may include changing operation, reducing generation, disconnecting the generators from the Jersey Central system, or other measures.
6. 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. The RTU, the communications channel and all related equipment will be furnished and maintained by the Interconnection Customer. The RTU must communicate with the FirstEnergy EMS via DNP 3.0 protocol.
7. The following status and metering points will be required:
 - a. Interconnection breaker position.
 - b. Generator real and reactive power output measured at the high-side of the generator step-up transformer.
 - c. Generator voltage at the point of interconnection.
8. An installation of two independent high-speed zones of protection to sense and clear faults on the interconnection transformer.
9. A compliance with the inverter standard UL1741 and IEEE 1547, “Standard for Interconnecting Distributed resources with Electrical Power Systems”, in addition to the power quality standards defined by ReliabilityFirst and PJM.
10. A provision of the necessary generator protection, synchronization controls, and fault detection to initiate a trip to protect the W3-151 Project equipment from faults on the Jersey Central System.
11. A compliance with the PJM Manuals and Operating instructions to have a plant operator on call 24/7 to respond within a minute to reduce the output of W3-151 Project when network constraints occur.

The above requirements are in addition to any metering or other requirements imposed by PJM.

Note that an assumption of this study is that the W3-151 Project generation will automatically be disconnected whenever the local area network is islanded. If this assumption is not correct, a direct transfer trip scheme will need to be implemented for such situations at the Interconnection Customer’s cost.

Network Impacts

Queue project W3-151 was studied as a(n) 16.0 MW (6.1 MW of which was Capacity) injection into JCPL's system at the Morris Park 34.5 kV substation. Project W3-151 was evaluated for compliance with reliability criteria for summer peak conditions in 2014.

Potential transmission network impacts are as follows:

Generator Deliverability

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

No violations identified.

Multiple Facility Contingency

(Double Circuit Tower Line contingencies only with full energy output. Stuck Breaker and Bus Fault contingencies will be applied during the Impact Study)

No violations identified.

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.)

No violations identified.

New System Reinforcements

(Upgrades required to mitigate reliability criteria violations, i.e. "Network Impacts", initially caused by the addition of this project generation.)

None required.

Contribution to Previously Identified System Reinforcements

(Overloads initially caused by prior Queue positions with additional contribution to overloading by this project. This project may have a % allocation cost responsibility which will be calculated and reported for the Impact Study.)

None required.

Short Circuit

None required.

Energy Portion of Interconnection Request

PJM also studied the delivery of the energy portion of the surrounding generation. Any potential 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 Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed. 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 analyzes all overload conditions associated with the overloaded element(s) identified. As a result of the aggregate energy resources in the area, the following violations were identified.

No violations identified.

Summary

The connection of the W3-151 Project to the FE transmission system will require no network upgrades. Therefore the Interconnection Customer will only have a cost responsibility for the Direct Connection of the W3-151 Project to the Jersey Central transmission system. As shown on Attachment 4, the estimated cost of these facilities is \$4,430,000.

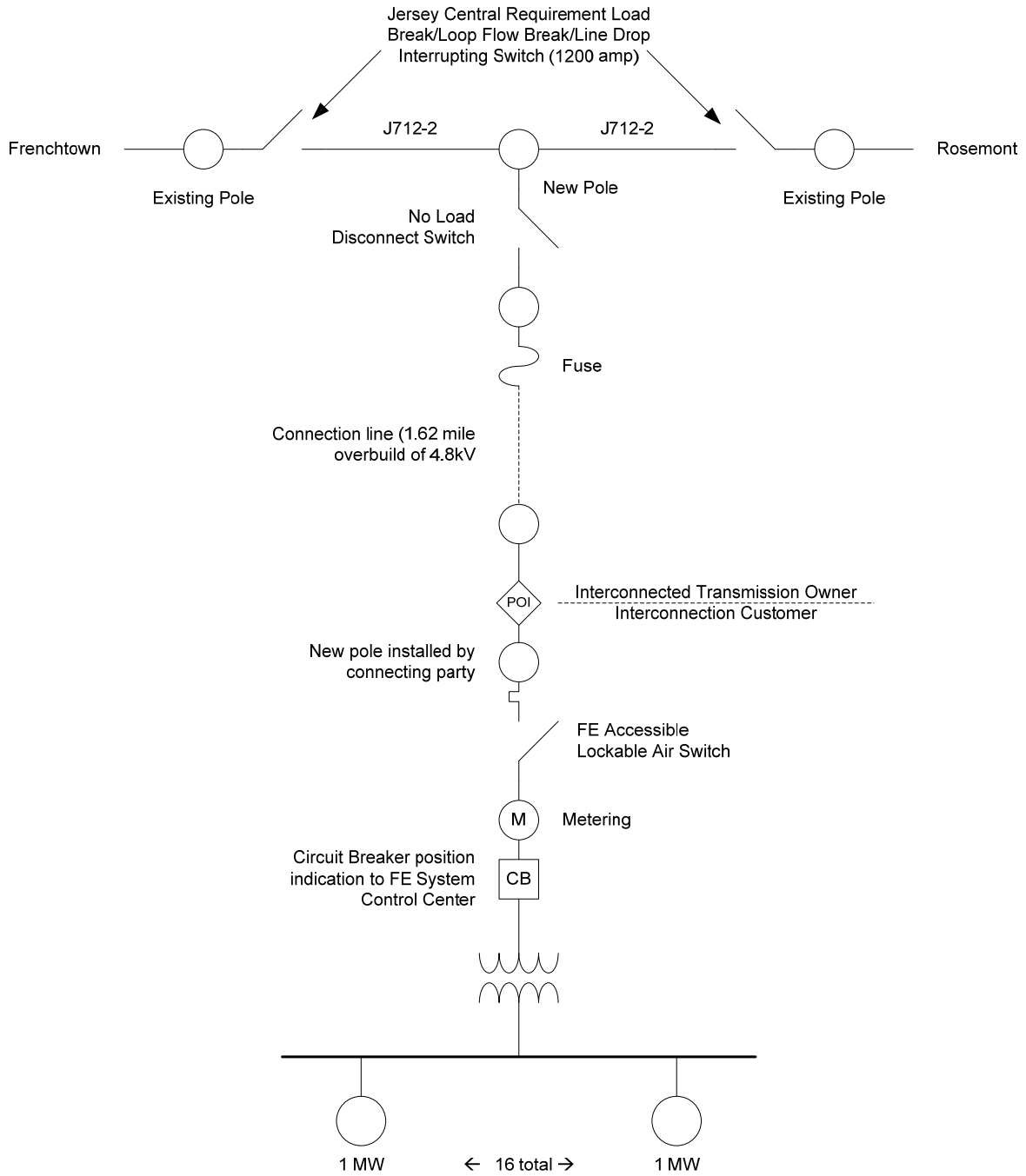
Based on the extent of the FE direct connection and system upgrades required to support this project, it is estimated that it will take one (1) year from the date of a fully executed Interconnection Construction Service Agreement to complete the upgrades required for the W3-151 Project. Full payment of the estimated cost of the project will be required upon execution of the Interconnection Service Agreement/Interconnection Construction Service Agreement (ISA/CSA). True up of the actual cost versus estimated cost of the project will be performed by FE at the end of the project. It further assumes that the Interconnection Customer will provide the property for the attachment and right-of-way facilities that will be needed. A further assumption is 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 34.5 kV transmission system outages can be scheduled when needed.

Note that the FE findings were made from a conceptual review of this project. A more detailed review of the connection facilities and their cost will be identified in the System Impact Study. Further note that the cost estimate data contained in this document should be considered as only ballpark since it was produced without a detailed engineering review. The applicant will be responsible for the actual cost of construction. FE herein reserves the right to return to any issues in this document and, upon appropriate justification, request additional monies to complete any connections to the transmission system.

Attachment 1
Site View

Attachment 2
Aerial View

Attachment 3 Single Line



Attachment 4
Estimated Costs

| Item | Connection Facilities |
|--|---|
| 1 | Construct approximately 2.95 miles of new overhead 34.5kV line from a point on the Morris Park - Ingersoll Rand (T124) 34.5 kV. This new line will be build on newly acquired 50' wide right-of-way parallel to the existing JCP&L Morris Park - Merrill Creek Tap (S919-1) / Morris Park - Martins Creek (P2016) transmission right-of-way. |
| 2 | Construct approximately 1.7 miles of new overbuild overhead 34.5 kV line to a point adjacent to the W3-151 Project site. |
| 3 | Construct a new tap pole, install 60 new poles on newly acquired right-of-way, replace 45 existing Distribution poles with taller Subtransmission poles and overbuild new 34.5 kV subtransmission tap line, install new switch on the tap, (single blade disconnects included in estimate), install load break switches on poles, located on either side of proposed tap pole, and all necessary guying, etc. and a span of wire to a customer owned meter pole beyond the switch pole. |
| 4 | Transfer the existing Distribution facilities to the new transmission structures. |
| 5 | No environmental review was conducted as part of this cost estimate. If environmental permitting is needed, an additional \$50,000 will be added to estimate. |
| 6 | No estimate for right-of-way investigation and engineering is included. Developer is responsible for providing new ROW along JCP&L's existing transmission ROW and verifying or providing valid rights to JCP&L to overbuild the existing distribution lines. |
| 7 | Estimate includes \$20,000 for metering to be mounted on a customer owned pole at its site. |
| 8 | Miscellaneous Protection, Fuses, Metering, RTU, SCADA |
| Total Substation Costs: \$4,430,000 | |

Attachment 5

FirstEnergy Revenue Metering Requirements For Generation Facilities Connected 46 kV and Lower

This document addresses the revenue metering requirements for new generation-only facilities connected to FirstEnergy (FE) system voltages 46 kV and lower. This document is not intended for existing retail or wholesale load facilities where behind-the-meter generation is being installed.

The FE operating company (FEOC) shall provide, own, operate, test, and maintain the revenue metering equipment at the Interconnection Customer's (IC) expense. FE reserves the right to review each proposed generation facility design and determine if the IC shall provide, own, operate, test, and maintain the revenue metering equipment at the IC's expense for engineering reasons.

The revenue metering equipment includes, but is not limited to, current transformers, voltage transformers, secondary wires, meter socket, bidirectional revenue meter, and associated devices.

The revenue metering equipment shall be located at the Point of Interconnection (POI) unless otherwise agreed to by FE and the IC. The revenue metering will be compensated for electrical energy losses if it is not located at the POI.

The IC must provide FE with a facility one line, the estimated bi-directional power flow at the revenue metering point, and any loss compensation data.

The IC shall provide and install the mounting structures (or enclosures) and conduits necessary for the metering installation unless otherwise agreed to by the FEOC. The conduit shall be 1-1/2 inch galvanized rigid steel conduit. Flexible galvanized steel (liquid tight) conduit may be used between instrument transformers. The FEOC will install the wiring in the conduit between the instrument transformers and the meter socket.

The IC shall mount the instrument transformers unless otherwise agreed to by the FEOC. The instrument transformers and meter socket shall be installed in a location that is readily accessible to authorized FEOC representatives. If for any reason the meter socket and/or associated devices must be mounted in a weatherproof enclosure, it shall be provided and installed by the IC. The meter socket shall be installed generally within 50 feet of the instrument transformers unless an alternate design has been approved by the FEOC. The meter socket shall be mounted such that the centerline of the meter is approximately five feet above final grade. Where vehicle traffic may interfere with or damage any revenue metering equipment, the IC must install concrete filled steel barrier posts to protect such equipment.

The bidirectional revenue meter provided and installed by the FEOC will record billing data in intervals typically fifteen minutes or thirty minutes. The IC shall provide, at its sole cost and expense, the installation, operation, and maintenance of the communication link required by the FE billing data collection system for access to the meter. The specifications for the typical telephone communication link are as follows:

- Standard voice grade (analog) with dial tone. No digital telephone lines are permitted.
- Two-pair or four-conductor with RJ-11 / Male termination. The FEOC will make final connection to the meter.
- Must be able to receive incoming calls.
- Must be a direct line to the meter with no operator interception or operation required.
- Install the telephone line and associated conduit between the telephone company source and the meter socket or enclosure.
- The telephone line must be tagged with a phone number, including the area code.
- The telephone line must be installed and operational prior to the IC's service being energized.

The IC shall, at its expense, install, own, operate, test, and maintain any metering and telemetry equipment that may be required to provide real-time meter data to FE or PJM.

The FEOC will provide the IC access to bidirectional kWh and kVARh pulses from the FEOC meter at the IC's expense if requested.

The IC shall provide FE with prior notification of any modifications at the facility that could affect the FEOC revenue meter measurements (substation reconfigurations, generator additions, etc).