

***Generation Interconnection
Feasibility Study Report***

For

***PJM Generation Interconnection Request
Queue Position X2-054***

Franklin

October 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 Pittstown, New Jersey. The installed facilities will have a total capability of 10.0 MW with 0.0 MW of this output being recognized by PJM as capacity. This means that the remaining 10.0 MW will be curtailable should a system reliability constraint occur.

Note that this project is an increase to the Interconnection Customer's W3-003 project, which will share the same property and connection point. The W3-003 project will have a capability of 10.0 MW with 0.0 MW being recognized as capacity. The total capability of the combined W3-003 and X2-054 projects will be 20.0 MW, with 0.0 MW being recognized by PJM as capacity and the remaining 20.0 MW will be curtailable should a system reliability constraint occur.

The proposed in-service date for this project is December 31, 2012. **This study does not imply a FirstEnergy commitment to this in-service date.**

Point of Interconnection

X2-054 will interconnect with the Jersey Central Power & Light system at the 34.5kV line A729 between the Baptistown substation and the West Flemington Tap.

FirstEnergy Analysis

The X2-054 Project will be a 10 MW increase to the previous 10 MW W3-003 Project, and will connect on the customer side of the W3-003 project Point of Interconnection (POI). As defined by the Interconnection Customer and shown on Attachment 2, the connection for the W3-003 and X2-054 Project will be from a tap of the West Flemington Tap - Baptistown section of the East Flemington - Eaton - West Flemington - West Flemington Tap - Baptistown - Frenchtown (A729) 34.5 kV. From this pole Jersey Central will construct a new 34.5 kV line extension that will be overbuilt on an existing 4.8 kV Distribution circuit right-of-way that follows a path for about 1.14 miles to a point adjacent to the W3-003 and X2-054 Project site. Jersey Central will then extend a one span radial line extension (about 200 feet) to a pole structure to be constructed, owned, operated and maintained by the Interconnection Customer. The Interconnection Customer will be responsible for the attachment line from this pole to the W3-003 and X2-054 Project collector substation. Since Jersey Central will not own, operate and maintain this extension, the contractual point of interconnection will be as identified on Attachments 2 and 3.

In summary, Attachment 3 shows a conceptual one-line diagram of the Direct Connection facilities that will be required for the W3-003 and X2-054 Projects. As indicated, the X2-054 Project will be studied as a 10 MW injection to the Jersey Central 34.5 kV system of the West Flemington Tap - Baptistown (A729-3) 34.5 kV line. Disconnect switches will be needed on poles as well as the radial tap pole 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 and right of way that may be required for the 34.5 kV line tap and the radial line extension. The Interconnection Customer will also be responsible for all permits and constructing, owning and operating all facilities on its side of the point of interconnection including the attachment line.

If the W3-003 Project proceeds as planned, there will be no modifications required to the FE system for the direct connection of the X2-054 Project. However, if the W3-003 Project withdraws, the X2-054 Project will be responsible for the direct connection facilities as described above for the W3-003 Project.

Power Flow Analysis

A Power Flow study was conducted to determine the reliability impact of the proposed X2-054 Project on the FE Transmission System. This study was completed using a 2013 summer peak and light load power flow that contain a detailed representation of the Jersey Central transmission networks in the area of the proposed X2-054 Project. Note that the year 2013 was chosen for study rather than 2016 since this is the first summer period when the X 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 X2-054 Project generation 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, the X2-054 Project will be one of eleven proposed generator

attachments to the East Flemington - Frenchtown (A729) 34.5 kV path to date with a total capability of 87 MW while the continuous rating of the limiting section of this circuit is only 35 MVA. Specifically as shown on Attachment 5, the FE study results show that with all eleven solar projects at their full energy output, the A729 line will overload for both peak and light load conditions. The worst of these overloads is the West Flemington to Flemington Tap section, which can exceed its normal rating of 35 MVA by 98.6% under light load conditions. Because the A729 line is radial, transmission contingencies do not make the overload worse. However, the overload can be increased by loss of distribution transformers or circuits served by the A729 line. If desired, the Interconnection Customer can fund a Jersey Central project to rebuild and reconductor the limiting facilities to eliminate these constraints.

The study results further show that higher overloads can be expected for off peak conditions. 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 a curtailment of the X2-054 Project output to its PJM capacity value can be expected at most times to maintain the Jersey Central system reliability within the NERC, Regional and FE operations and planning.

Note that a further conclusion of this study is that it will be mandatory for the X2-054 Project to have a range of dynamic reactive capability that supports its operation from a .95 lead to .95 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 X2-054 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 RTEP process, a short circuit analysis will not be conducted by PJM since the X2-054 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 X2-054 Project. Therefore no circuit breaker reinforcements will be required.

System Protection Analysis

An analysis was conducted to assess the impact of the X2-054 Project on the system protection requirements in the area. The results of this review have identified the following:

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

Under the assumption that the X2-054 Project generation will not supply fault current to the Jersey Central transmission system, there will be no protection upgrades needed for the East Flemington - Frenchtown (A729) 34.5 kV line. However, the X2-054 Project will be required to have two independent high-speed zones of protection to sense and clear faults on the interconnection transformer.

Fault currents at the connection point are listed below.

	THREE-PHASE	SINGLE-LINE
X/R	2.9610	4.0692
Fault Current (Amps)	3122.8	1660.0

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 the Interconnection Customer's responsibility to make any protection upgrades required should this occur.

Note that for the combined 20 MW load, it is not recommended to add fusing on the line due to the low magnitude of maximum fault current available by the system.

Metering

The FirstEnergy Revenue Metering Requirements may be found in the FirstEnergy Requirements for Transmission Connected Facilities document located at the following links:

www.firstenergycorp.com/feconnect

www.pjm.com/planning/design-engineering/to-tech-standards.aspx

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 3.29 MVAR) and .95 lagging (producing 3.29 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 X2-054 Project substation at the Interconnection Customer's cost.

The Interconnection Customer will also 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 X2-054 Project for the conditions studied. Therefore the conclusion is that no Transmission or Distribution system reinforcements will be required to provide the requested service.

A protection upgrade was identified for a previous PJM Project, W4-026, on the East Flemington – Frenchtown (A729) 34.5 kV line. The W4-026 project is responsible for the installation of an SEL-279 reclosing relay on the A729 circuit breaker at East Flemington substation. If prior projects withdraw from the PJM generation queue, the X2-054 project could become responsible for this upgrade. The estimated cost of this upgrade is \$241,500. This cost includes a CIAC (Contribution in Aid of Construction) Federal Income Tax Gross Up charge of \$59,100. This tax may or may not be charged based on whether or not this project meets the eligibility requirements of IRS Notice 88-129.

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 X2-054 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. This includes the installation of intertie relays at the point of interconnection that either trip the breaker at the point of interconnection or the individual generators beyond the point of interconnection. The function of the intertie relays must include over/under voltage and over/under frequency protection. Note that these intertie relays are in addition to and must be separate from of the two relays that provide independent high speed zone of protection to sense and clear faults. They include the installation of an SEL-351-7 (Version 7) relay or its equivalent for power elements, a potential transformer or CCVT's on the high side of the transformer, and current transformers on the high side of the transformer.
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 X2-054 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 Interconnection Customer 34.5 kV 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, control and metering points will be required:
 - a. Interconnection breaker position status and trip control.

- 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 X2-054 Project equipment from faults on the Jersey Central System.
- 11. The Interconnection Customer will not excavate, construct facilities or locate solar panels under the existing Jersey Central Transmission and Distribution facilities or on Jersey Central right-of-ways without the express permission of FE.
- 12. 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 X2-054 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 X2-054 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 X2-054 was studied as a(n) 10.0 MW (0.0 MW of which was Capacity) injection into JCPL's system at the BAPTISTN 34.5 kV substation. Project X2-054 was evaluated for compliance with reliability criteria for summer peak conditions in 2015.

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

(Report over-dutied breakers.)

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

If the W3-003 project proceeds as planned, then the connection of the X2-054 Project to the FE transmission system will require no network upgrades or new direct connection facilities and will therefore have no cost responsibility to FE. However, if the W3-003 Project withdraws, the Interconnection Customer will have a cost responsibility for the Direct Connection of the X2-054 Project to the Jersey Central transmission system that was previously identified for the W3-003 Project. As shown on Attachment 4, the estimated cost of the W3-003 Project direct connection facilities is \$1,606,000. This cost includes a CIAC (Contribution in Aid of Construction) Federal Income Tax Gross Up charge of \$389,454. This tax may or may not be charged based on whether or not this project meets the eligibility requirements of IRS Notice 88-129.

If the W3-003 Project does not proceed as planned and the X2-054 Project becomes responsible for the direct connection facilities, then 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 X2-054 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. As a requirement, the Interconnection Customer must provide the property for the attachment and right-of-way facilities that will be needed at the project initiation. It is also assumed 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 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 Diagram

Attachment 4

Estimated Costs

If the W3-003 Project proceeds as planned, there will be no costs for the X2-054 Project. If the W3-003 project withdraws, the X2-054 Project will become responsible for the costs identified above for the W3-003 project.

Attachment 5
Solar Generation Project Analysis
Full Energy Dispatch

2013 Peak Load Conditions

Outage description	Overloaded Element	ID	MVA Rating		% of Rating	
			Normal	LTE	Normal	LTE
Normal operating conditions	Flemington tap - West Flemington 34.5 kV	A729	35	44	183.4	

2013 Light Load Conditions

Outage description	Overloaded Element	ID	MVA Rating		% of Rating	
			Normal	LTE	Normal	LTE
Normal operating conditions	Flemington tap - West Flemington 34.5 kV	A729	35	44	198.6	

Because the East Flemington - Frenchtown (A729) 34.5 kV line is radial, transmission contingencies do not make the overloads given above worse. However, the overloads can be increased by loss of distribution transformers or circuits served by the A729 line.