Generation Interconnection Feasibility Study Report

For

PJM Generation Interconnection Request Queue Position AC1-141

Cook - East Elkhart 345 kV

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 proposes to increase the generation of its previously proposed PJM Project #AA2-116 by 91.0 MW (91.0 MW Capacity) connecting to AEP's Cook – East Elkhart 345 kV circuit in Cass County, Michigan (see Figure 1). The original #AA2-116 request was for a 994.0 MW (994.0 MW Capacity) natural gas generating facility. The total plant output with the additional 91.0 MW will be 1085.0 MW.

The requested in service date is April 1, 2020.

Attachment Facilities

Point of Interconnection (Cook - East Elkhart 345 kV)

PJM Project #AA2-116 will pay for the necessary direct connection work required.

It is understood that The Interconnection Customer is responsible for all costs associated with this interconnection. The costs above are reimbursable to AEP. The cost of The Interconnection Customer's generating plant and the costs for the line connecting the generating plant to The Interconnection Customer's switching station are not included in this report; these are assumed to be The Interconnection Customer's responsibility.

The Generation Interconnection Agreement does not in or by itself establish a requirement for American Electric Power to provide power for consumption at the developer's facilities. A separate agreement may be reached with the local utility that provides service in the area to ensure that infrastructure is in place to meet this demand and proper metering equipment is installed. It is the responsibility of the developer to contact the local service provider to determine if a local service agreement is required.

Interconnection Customer Requirements

Requirement from the PJM Open Access Transmission Tariff:

- 1. An Interconnection Customer entering the New Services Queue on or after October 1, 2012 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.
- 2. The Interconnection Customer may be required to install and/or pay for metering as necessary to properly track real time output of the facility as well as installing metering which shall be used for billing purposes. See Section 8 of Appendix 2 to the Interconnection Service Agreement as well as Section 4 of PJM Manual 14D for additional information.

Revenue Metering and SCADA Requirements

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 Sections 24.1 and 24.2.

AEP Requirements

The Interconnection Customer will be required to comply with all AEP Revenue Metering Requirements for Generation Interconnection Customers. The Revenue Metering Requirements may be found within the "Requirements for Connection of New Facilities or Changes to Existing Facilities Connected to the AEP Transmission System" document located at the following link:

http://www.pjm.com/~/media/planning/plan-standards/private-aep/aep-interconnection-requirements.ashx

Network Impacts

The Queue Project AC1-141 was evaluated as a 91.0 MW (Capacity 91.0 MW) uprate to the AA2-116 project in the AEP area. Project AC1-141 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AC1-141 was studied with a commercial probability of 53%. Potential network impacts were as follows:

Base Case Used

Summer Peak Analysis – 2020 Case

Contingency Descriptions

The following contingencies resulted in overloads:

None

Generator Deliverability

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

None

Multiple Facility Contingency

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

None

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

Steady-State Voltage Requirements

None

Short Circuit

(Summary of impacted circuit breakers)

New circuit breakers found to be over-duty:

None

Affected System Analysis & Mitigation

LGEE Impacts:

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

MISO Impacts:

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

Duke, Progress & TVA Impacts:

Duke Carolina, Progress, & TVA Impacts to be determined during later study phases (as applicable).

OVEC Impacts:

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

Delivery of Energy Portion of Interconnection Request

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

<u>Light Load Analysis - 2020</u>

Light Load Studies to be conducted during later study phases (as required by PJM Manual 14B).

Stability and Reactive Power Requirement

(Results of the dynamic studies should be inserted here)

To be determined during the System Impact Study

New System Reinforcements

None

Schedule

It is anticipated that the time between receipt of executed agreements and Commercial Operation may range from 12 to 18 months if no line work is required. If line work is required, construction time would be between 24 to 36 months after signing an interconnection agreement.

Conclusion

Based upon the results of this Feasibility Study, the increase of 91.0 MW (PJM Project #AC1-141) to the previous 994.0 MW natural gas generating request (PJM Project #AA2-116) will not require additional interconnection charges. PJM Project #AA2-116 will pay for the necessary direct connection work required.