

Generation Interconnection Feasibility Study Report for

Queue Project AF1-217

EDINBORO SOUTH 34.5 KV

12 MW Capacity / 20 MW Energy

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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 Mid-Atlantic Interstate Transmission (MAIT) (Penelec zone).

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 Crawford 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 March 1, 2021. This study does not imply a TO commitment to this in-service date.

Final attachment facilities and local upgrades (if required) along with terms and conditions to interconnect AF1-217 will be specified in a separate two party Interconnection Agreement (IA) between MAIT/Penelec zone and the Interconnection Customer as this project is considered FERC non-jurisdictional per the PJM Open Access Transmission Tariff (OATT).

Queue Number	AF1-217						
Project Name	EDINBORO SOUTH 34.5 KV						
State	Pennsylvania						
County	Crawford						
Transmission Owner	PENELEC						
MFO	20						
MWE	20						
MWC	12						
Fuel	Solar						
Basecase Study Year	2023						

4 Point of Interconnection

4.1 Primary POI

AF1-217 will interconnect with the PENELEC distribution system via a new 34.5 kV circuit on the #2 bus at the Edinboro South substation. The IC's proposed generating unit site is approximately 2.9 miles northwest of Cambridge Springs, PA., near Mt. Pleasant Road.

Attachment 1 shows a one-line diagram of the proposed primary direct connection facilities for the AF1-217 generation project to connect to the Penelec distribution system. 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 Penelec distribution system's direct connection facilities.

4.2 Secondary POI

The secondary POI is a 34.5kV interconnection via a tap on the Cambridge Springs circuit at the Penelecowned Edinboro South substation. A full scope of work or estimated cost is not provided for the proposed Secondary POI.

5 Cost Summary

Total estimated cost for the required Interconnection Facilities is **\$1,205,300**. 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.

Final attachment facilities and local upgrades (if required) along with terms and conditions to interconnect AF1-217 will be specified in a separate two party Interconnection Agreement (IA) between MAIT/Penelec zone and the Interconnection Customer as this project is considered FERC non-jurisdictional per the PJM Open Access Transmission Tariff (OATT).

In addition, the AF1-217 project may be responsible for a contribution to the following costs for network impacts to the system:

Description	Total Cost
System Upgrades	\$0 ¹

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

¹ There is one violation identified for this project as can be seen in the Network Impacts Section of this report. Currently there is a Supplemental Project s1820 to replace terminal equipment at Erie South, Edinboro South and Venanago Junction 115 Substations which is expected to alleviate the network impact. The project has a projected in-service date of 2/29/2020. This project will need to go through the System Impact Study phase to test the solution and ensure this upgrade resolves the issue identified.

(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 Non-Direct Connection work for the interconnection of the AF1-217 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.

6 Transmission Owner Scope of Work

AF1-217 will interconnect with the PENELEC distribution system via a new 34.5 kV circuit on the #2 bus at the Edinboro South substation. The IC's proposed generating unit site is approximately 2.9 miles northwest of Cambridge Springs, PA., near Mt. Pleasant Road.

Attachment 1 shows a one-line diagram of the proposed primary direct connection facilities for the AF1-217 generation project to connect to the Penelec distribution system. 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 Penelec distribution system's direct connection facilities.

Description	Total Cost
Primary POI is to connect directly to the Edinboro South #2 34.5kV bus and 34.5kV GOAB to interconnect queue project AF1-217. Install new line position facilities including 34.5 kV GOAB for AF1-217 generator interconnection. @ Edinboro South	\$ 261,300
Install 34.5 kV metering in customer's facilities. The customer is responsible to build their own line from their site to Penelec's existing facilities.	\$ 72,200
Nameplates and customer drawing review @ AF1- 217 Customer Substation	\$ 72,300
Expand existing Edinboro South substation to install new 34.5 kV circuit breaker line position for AF1-217 generator interconnection. @ Edinboro South	\$ 799,500
Total Attachment Facility Costs	\$1,205,300

7 Schedule

Based on the scope of work for the interconnection, it is expected to take a minimum of **16 months** after the signing of an Interconnection Agreement to complete the installation. 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 interconnection work, and that all transmission and distribution system outages will be allowed when requested.

8 Transmission Owner Analysis

Penelec performed an analysis of its distribution system. The AF1-217 project did not contribute to any overloads on the distribution system for either the primary POI or the secondary POI.

9 Interconnection Customer Requirements

9.1 System Protection

An analysis was conducted to assess the impact of the Edinboro South 34.5 kV (AF1-217) Project on the system protection requirements in the area. The results of this review show that the following relay additions will be required:

Proposed single line diagrams show IC constructing a generation facility tapping Penelec's Edinboro South - 34.5kV substation by a new dedicated breaker. This breaker will be controlled and operated by a SEL-351 relay for overload, sync check/ dead-line closing, voltage and frequency monitoring. Anti-islanding system shall meet IEEE 1547 and UL 1741. Therefore, no Direct Transfer Trip (DTT) will be required.

The 34.5kV interconnection proposal will require Developer to meet applicable "Technical Requirements" as outlined in First Energy's document titled "Technical Requirements for the Interconnection of Customer-Owned Generation to the FirstEnergy Distribution System".

9.2 General Concerns

It is to be understood, for abnormal operation of the Penelec system, which could cause IC's generation facility to be electrically isolated from the Penelec system synchronous source via the tripping of a interconnecting primary voltage line or device, IC will, via Penelec's direction, be required to disconnect the generation from Penelec's system and remain disconnected (<u>units are required to be OFF LINE</u>), until the Penelec system normal circuitry is restored. These abnormal conditions will be reviewed by Penelec system operators as to the need for the generation facility to be disconnected.

9.3 Requirements for IC's generation IPP Facility

The proposed interconnection Owner's/Developer's facilities must be designed in accordance with the document titled <u>FirstEnergy Distribution Engineering Practices Interconnection of Customer-Owned Generation to the FirstEnergy Distribution System</u> dated 11/17/14 located at the following link:

http://www.pjm.com/planning/design-engineering/to-tech-standards/private-firstenergy.aspx

The document is referred to as engineering practice EP(# 02-280) with section 4 part C specifically referencing the "interconnection technical requirements". Certain protection requirement are shown.

Additionally, IC is responsible to provide adequate protection (for their equipment) under any distribution system operating condition' - which includes 'Separation from supply' (i.e. tripping of F.E. circuit breakers) and 'Re-synchronizing the generation after electric restoration of the supply' (i.e. reclosing of F.E. circuit breakers).

IC's protection must be designed to coordinate with the reclosing practices of FirstEnergy line protective devices. The generator must cease to energize the FirstEnergy circuit to which it is connected prior to reclosing of any (FE) automatic reclosing devices.

IC's electrical protection and control schematics shall be provided to FE for consideration. FE may request modifications, if required, to meet the technical requirements.

9.4 Compliance Issues

IC will be responsible for meeting a power factor between 0.90 lagging (producing MVARs) to 0.95 leading (absorbing MVARs) and assure that voltage deviation will be less than 1.0 volt as measured at the POI under all Solar Gen operating conditions due to the inherent dynamic reactive power capability of this solar facility.

Generators with no inherent VAR (reactive power) control capability, or those that have a restricted VAR capability less than the defined requirements, must provide dynamic supplementary reactive support located at the generation facility with electrical characteristics equivalent to that provided by a similar sized synchronous generator. A Dynamic Reactive Compensation (either Static VAR Compensator (SVC) or STATCOM) or other method be applied in order to maintain the required specifications at the POI. IC is responsible for the installation of equipment on its side of the POI in order to adhere to the criteria stated above by FirstEnergy.

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.

10.1.1 Meteorological Data Reporting Requirement

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

- Temperature (degrees Fahrenheit)
- Atmospheric pressure (hectopascals)
- Irradiance
- Forced outage data

10.2 PENELEC Requirements

IC will be required to comply with all FE Revenue Metering Requirements for Generation Interconnection Customers. These FE requirements are the following:

The FE operating company (Penelec) shall provide, own, operate, test, and maintain the revenue metering equipment at the Interconnection Customer's (IC) expense. 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 IC shall mount the instrument transformers unless otherwise agreed to by Penelec. The instrument transformers and meter socket shall be installed in a location that is readily accessible to authorized Penelec representatives. Penelec will provide the IC access to bidirectional kWh and kVARh pulses from the Penelec meter at the IC's expense if requested. 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.

11 Network Impacts – Primary POI

The Queue Project AF1-217 was evaluated as a 20.0 MW (Capacity 12.0 MW) injection at the Edinboro South #1 34.5 kV substation in the PENELEC area. Project AF1-217 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF1-217 was studied with a commercial probability of 53%. Potential network impacts were as follows:

Summer Peak Load Flow

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)

ID	FROM BUS#	FROM BUS	kV	FROM BUS AREA	TO BUS#	TO BUS	kV	TO BUS AREA	CKT ID	CONT NAME	Туре	Rating MVA	PRE PROJECT LOADING %	POST PROJECT LOADING %	AC DC	MW IMPACT
50572040	200572	26EDINB S.	115.0	PENELEC	200567	26ERIE SO.	115.0	PENELEC	1	ATSI- P2-3- CEI- 345- 004D	breaker	185.0	99.88	105.15	DC	9.74

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 Reinforcements¹

ID	Index	Facility	Upgrade Description	Cost
50572040	1	26EDINB S. 115.0 kV - 26ERIE SO. 115.0 kV Ckt 1	PENELEC s1820: Supplemental upgrade s1820: Erie South - Edinboro South - Venango 115 kV Junction Terminal Equipment replacement. • Edinboro South 115 kV - replace bus section breaker, Line traps, substation conductor, line relaying and CCVTs (s1820.1) • Venango Junction 115 kV Substation - replace Substation conductor, CCVT and arresters. (s1820.2) • Erie South 115 kV Substation - replace Circuit breaker, arresters, CCVT, line trap, line relaying and substation conductor. (s1820.3) The supplemental project has a projected in- service date of 02/29/2020. Project Type: CON Cost: \$0	\$0
			TOTAL COST	\$0

11.6 Flow Gate Details

The following indices contain additional information about each flowgate presented in the body of the report. For each index, a description of the flowgate and its contingency was included for convenience. However, the intent of the appendix section is to provide more information on which projects/generators have contributions to the flowgate in question. Although this information is not used "as is" for cost allocation purposes, it can be used to gage other generators impact. It should be noted the generator contributions presented in the appendices sections are full contributions, whereas in the body of the report, those contributions take into consideration the commercial probability of each project.

11.7 Index 1

ID	FROM BUS#	FROM BUS	FROM BUS AREA	TO BUS#	TO BUS	TO BUS AREA	CKT ID	CONT NAME	Туре	Rating MVA	PRE PROJECT LOADING %	POST PROJECT LOADING %	AC DC	MW IMPACT
50572040	200572	26EDINB S.	PENELEC	200567	26ERIE SO.	PENELEC	1	ATSI-P2- 3-CEI- 345- 004D	breaker	185.0	99.88	105.15	DC	9.74

Bus #	Bus	MW Impact
915951	Y3-092 FTIR	78.1800
942813	AE2-299 BAT	19.3072
943151	AE2-344 C	33.9267
943152	AE2-344 E	22.6178
943871	AF1-055 C O1	1.6924
943872	AF1-055 E O1	1.1283
944382	AF1-103 BAT	1.4974
944391	AF1-104 O1	0.8057
945051	AF1-170 C	10.9191
945052	AF1-170 E	7.2794
946221	AF1-287 C	5.8434
946222	AF1-287 E	3.8956
946771	AF1-217 C O1	5.8434
946772	AF1-217 E O1	3.8956
LGEE	LGEE	0.0411
CPLE	CPLE	0.0377
WEC	WEC	0.0227
CBM-W2	CBM-W2	0.5733
NY	NY	0.4407
CBM-W1	CBM-W1	0.8882
TVA	TVA	0.0952
O-066	O-066	0.8534
CBM-S2	CBM-S2	0.3526
CBM-S1	CBM-S1	0.5879
G-007	G-007	0.1238
MEC	MEC	0.1128

Affected Systems

11.8 Affected Systems

11.8.1 LG&E

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

11.8.2 MISO

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

11.8.3 TVA

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

11.8.4 Duke Energy Progress

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

11.8.5 NYISO

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

11.9 Contingency Descriptions

Contingency Name	Contingency Definition
ATSI-P2-3-CEI-345-004D	CONTINGENCY 'ATSI-P2-3-CEI-345-004D'

Short Circuit

11.10 Short Circuit

The following Breakers are overduty:

None

12 Network Impacts – Secondary POI

The Queue Project AF1-217 was evaluated as a 20.0 MW (Capacity 12.0 MW) injection at the Edinboro South #2 34.5 kV substation in the PENELEC area. Project AF1-217 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF1-217 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)

ID	FROM BUS#	FROM BUS	kV	FROM BUS AREA	TO BUS#	TO BUS	kV	TO BUS AREA	CKT ID	CONT NAME	Туре	Rating MVA	PRE PROJECT LOADING %	POST PROJECT LOADING %	AC DC	MW IMPACT
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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

12.5 Flow Gate Details

The following indices contain additional information about each flowgate presented in the body of the report. For each index, a description of the flowgate and its contingency was included for convenience. However, the intent of the appendix section is to provide more information on which projects/generators have contributions to the flowgate in question. Although this information is not used "as is" for cost allocation purposes, it can be used to gage other generators impact. It should be noted the generator contributions presented in the appendices sections are full contributions, whereas in the body of the report, those contributions take into consideration the commercial probability of each project.

12.6 Index 1

ID	FROM BUS#	FROM BUS	FROM BUS AREA	TO BUS#	TO BUS	TO BUS AREA	CKT ID	CONT NAME	Туре	Rating MVA	PRE PROJECT LOADING %	POST PROJECT LOADING %	AC DC	MW IMPACT
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Bus #	Bus	MW Impact
915951	Y3-092 FTIR	78.1800
942813	AE2-299 BAT	19.3072
943151	AE2-344 C	33.9267
943152	AE2-344 E	22.6178
943871	AF1-055 C O2	1.2876
943872	AF1-055 E O2	0.8584
944382	AF1-103 BAT	1.4974
944391	AF1-104 O2	0.8057
945051	AF1-170 C	10.9191
945052	AF1-170 E	7.2794
945521	AF1-217 C O2	5.8433
945522	AF1-217 E O2	3.8955
946221	AF1-287 C	5.8434
946222	AF1-287 E	3.8956
LGEE	LGEE	0.0411
CPLE	CPLE	0.0377
WEC	WEC	0.0227
CBM-W2	CBM-W2	0.5733
NY	NY	0.4407
CBM-W1	CBM-W1	0.8882
TVA	TVA	0.0952
O-066	O-066	0.8534
CBM-S2	CBM-S2	0.3526
CBM-S1	CBM-S1	0.5879
G-007	G-007	0.1238
MEC	MEC	0.1128

Affected Systems

12.7 Affected Systems

12.7.1 LG&E

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

12.7.2 MISO

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

12.7.3 TVA

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

12.7.4 Duke Energy Progress

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

12.7.5 NYISO

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

12.8 Contingency Descriptions

Contingency Name	Contingency Definition
ATSI-P2-3-CEI-345-004D	CONTINGENCY 'ATSI-P2-3-CEI-345-004D'

Short Circuit

12.9 Short Circuit

The following Breakers are overduty:

None

13 Attachment One: One Line Diagram