



**Generation Interconnection
Feasibility Study Report (Revised)
for
Queue Project AG1-470
RINGGOLD 138 KV
20 MW Capacity / 50 MW Energy**

November 2021

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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 APS – Potomac Edison.

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 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 Storage generating facility located in Washington County, Maryland. The installed facilities will have a total capability of 50 MW with 20 MW of this output being recognized by PJM as Capacity. The proposed in-service date for this project is September 06, 2024. This study does not imply a TO commitment to this in-service date.

Queue Number	AG1-470
Project Name	RINGGOLD 138 KV
State	Maryland
County	Washington
Transmission Owner	APS – Potomac Edison
MFO	50
MWE	50
MWC	20
Fuel	Storage
Basecase Study Year	2024

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

4.1 Primary

AG1-470 proposes a primary Point of Interconnection with the APS transmission system at the Ringgold 138 kV substation.

The interconnection of the AG1-470 project at the Primary POI will be accomplished by constructing a new direct connection to the Ringgold 138 kV substation.

Attachment 1 shows a one-line diagram of the proposed primary direct connection facilities for the AG1-470 generation project to connect to the FirstEnergy (“FE”) transmission 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 FE transmission system’s direct connection facilities.

4.2 Secondary

AG1-470 proposes a secondary Point of Interconnection with the APS transmission system at the Ringgold to East Hagerstown 138 kV substation in the APS area.

The interconnection of the project at the Secondary POI can be accomplished by tapping the East Hagerstown – Ringgold 138 kV line with a three-breaker ring bus interconnection substation and loop the East Hagerstown – Ringgold 138 kV line into the new substation. The transmission line tap will be located approximately 0.1 miles from Ringgold substation. A full scope of work or estimated cost is not provided for the proposed Secondary POI. Only network impacts are provided for the Secondary POI, which can be found in the “Network Impacts-Secondary Point of Interconnection” section of this report.

5 Cost Summary

The AG1-470 project will be responsible for the following costs:

Description	Total Cost
Total Physical Interconnection Costs	\$2,580,000
Total System Network Upgrade Costs	\$0
Total Costs	\$2,580,000

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 2016-36, 2016-25 I.R.B. (6/20/2016). 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

The interconnection of the project at the Primary POI will be accomplished by constructing a new direct connection to the Ringgold 138 kV substation.

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

Description	Total Cost
Install disconnect switch, dead-end structure, and associated facilities for generator lead line exit at interconnection substation.	\$330,000
Expand bus at Ringgold 138 kV, install (1) new 138kV breaker and associated equipment	\$2,250,000
Total Physical Interconnection Costs	\$2,580,000

7 Schedule

Based on the scope of work for the Attachment Facilities and the Direct and/or Non-Direct Connection facilities, it is expected to take a minimum of **24 months** after the signing of an Interconnection Construction Service Agreement 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.

The schedule for the required Network Impact Reinforcements will be more clearly identified in future study phases. The estimate elapsed time to complete each of the required reinforcements is identified in the “System Reinforcements” section of the report.

8 Transmission Owner Analysis

8.1 Power Flow Analysis

FE performed an analysis of its underlying transmission <100 kV system. The AG1-470 project did not contribute to any overloads on the FE transmission <100 kV 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.

All new generator only and new generator plus load facilities must be isolated from the FE transmission System by a Power Transformer. Section 14.2.6 of FE’s “Requirements for Transmission Connected Facilities” document specifies the winding configurations of the transformer connecting to a non-effectively grounded portion of the FE Transmission system shall be determined by FE on a case-by-case basis.

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 AG1-470 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 AG1-470 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 system.

9.3 Power Factor Requirements

The IC shall design its 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 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 AG1-470 was evaluated as a 50.0 MW (Capacity 20.0 MW) injection at the Ringgold 138 kV substation in the APS area. Project AG1-470 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AG1-470 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 - Summer Peak Load Flow - Primary POI

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".

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None.

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

Contingency Name	Contingency Definition
PEPCO_P1_PP1	CONTINGENCY 'PEPCO_P1_PP1' OPEN BRANCH FROM BUS 223937 TO BUS 223938 CKT 1 / 223937 DICK 230 230 223938 DICKH230 230 1 END
PEPCO_P1_PP2	CONTINGENCY 'PEPCO_P1_PP2' OPEN BRANCH FROM BUS 223937 TO BUS 223938 CKT 2 / 223937 DICK 230 230 223938 DICKH230 230 2 END

12 Short Circuit Analysis - Primary POI

The following Breakers are overdutied:

None.

12.1 System Reinforcements - Short Circuit

None.

13 Summer Peak - Load Flow Analysis - Secondary POI

The Queue Project AG1-470 was evaluated as a 50.0 MW (Capacity 20.0 MW) injection which is tapping the Ringgold to East Hagerstown 138 kV substation in the APS area. Project AG1-470 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AG1-470 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.

ID	FROM BUS#	FROM BUS	kV	FROM BUS AREA	TO BUS#	TO BUS	kV	TO BUS AREA	CK T ID	CONT NAME	Type	Rating MVA	PRE PROJE CT LOADING %	POST PROJE CT LOADING %	AC/D C	MW IMPACT
167740183	223938	DICKH230	230.0	PEPCO	223937	DICK230	230.0	PEPCO	2	PEPCO_P1_PP1	operation	680.0	105.12	106.19	DC	7.06
167740186	223938	DICKH230	230.0	PEPCO	223937	DICK230	230.0	PEPCO	1	PEPCO_P1_PP2	operation	680.0	105.12	106.19	DC	7.06

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.

13.6 Contingency Descriptions - Secondary POI

Contingency Name	Contingency Definition
PEPCO_P1_PP1	CONTINGENCY 'PEPCO_P1_PP1' / 794 OPEN BRANCH FROM BUS 223937 TO BUS 223938 CKT 1 / 223937 DICK 230 230 223938 DICKH230 230 1 END
PEPCO_P1_PP2	CONTINGENCY 'PEPCO_P1_PP2' / 795 OPEN BRANCH FROM BUS 223937 TO BUS 223938 CKT 2 / 223937 DICK 230 230 223938 DICKH230 230 2 END

14 Affected Systems

14.1 NYISO

Stability analysis will be performed in the Facilities Study Phase.

15 Attachment 1: One Line Diagram