

Geenex Solar

PJM INTERCONNECTION QUEUE REFORM DESIGN COMPONENTS

October 29, 2021



Geenex Solar – Design Component Details – Areas for Alignment

- Geenex support PJM's move to a Cluster methodology for Interconnection
- The Design Components address many of the Stakeholder concerns
- Whilst Geenex are in agreement with many of the Component Details in PJM's Proposal, we propose areas for further alignment between relevant parties on the following slides.

Site Control

(Submission #1 –Application)

Site Control & Term:	Site Plan:
Generating Facility: Deed/Lease/Option – minimum 2 Year term from beginning of Phase 1	<p>Generating Site: Lead Lines: POI</p> <p>TOs to provide property requirements relevant to project POI location (i) minimum acreage for required switchyard, storm water retention, access (ii) confirmation of location of transmission lines if dual circuit (iii) acceptable distance from transmission towers if required for new taps</p>

(Submission #2 – IC Decision Point 2)

Site Control & Term:	Site Plan & Relocations:
<p>Generating Facility: Deed/Lease/Option – minimum 1 Year term</p> <p>Generator Lead Lines: Deed/Lease/Option/ROW – minimum 4 year term</p> <p>Greenfield Interconnection Switchyard: Deed/Lease/Option – minimum 4 year term</p>	<p>Generating Site : Lead Lines: POI</p> <p>Relocations permitted (i) if conditions exist on original locations which could not have been discovered at Application Phase (ii) does not change circuit endpoints</p> <p>If modifications are required, IC will have until IC D3 to acquire site control for equipment relocation</p>

(Submission #3 – Decision Point 3)

Full Site Control:	Site Plan :
<p>Generating Facility: Deed/Lease/Option – Term to COD</p> <p>Generator Lead Lines: Deed/Lease/option/ROW – Term to COD</p> <p>Greenfield Interconnection Switchyard: Deed/Lease/Option – Term to COD</p>	<p>Generating Site</p> <p>Generator Lead Lines</p> <p>Greenfield Interconnection Switchyard</p>

Affected System Studies

Affected System Study process and coordination is an area of major concern

- The PJM Queue Reform Process needs to address coordinated planning with ISO/RTOs to better align queue study cycles & timelines to effectively handle Affected Systems issues
- PJM to provide information on website as to which queue projects are being delayed by Affected Systems issues & responsible TO
- PJM to provide details of Affected System impacts for project to enable a kickoff call between the parties. Review specifics for IC facilities – including power flow models utilized in the study for tie lines and non tie lines
- At the later of 60 days after the start of the Phase 2 or when PJM alert ICs, IC will execute an Affected System Agreement with the neighboring utility
- Executed Agreement copied to PJM and a proposed timeline between Parties will be agreed

Inter-queue Funding

- A mechanism for more equitable allocation of costs is needed, to avoid creating “Free Riders” in subsequent clusters, which would be the result of the proposed PJM Interconnection Reform Solution
- Inter-queue cluster funding required for Network Upgrades that equal or exceed \$25M or [\$25,000]/MFOt. MFOt is the sum of MFO for all projects with an allocation of that Network Upgrade.
- Allocated to subsequent cluster that start within 5 years of the initial cluster funding of the network upgrade
- Eliminate subsequent cluster allocation early if cost per IC is diluted to less than [\$50,000]/MFOt.
- Memorialize in a Multi-Party Shared Network Upgrade Agreement (MPFCA) which contains cross indemnification and contingency measures should one or more projects withdraw from the Agreement.

Suspension Period

- Due to numerous market events which may constrain resources during short periods of time, Geenex is proposing a maximum total one year suspension period.
 - Constrained resources :
 - Insufficient Labor or materials to meet the needs of multiple IC's at the same time
 - Tariffs which limit supply in the market
- One year suspension allows IC's to ride through the constraint bubbles
- Given the level of commitment and resources invested by all parties in any late-stage project, the availability of a suspension period provides significant assurance that a project is offered every opportunity to succeed.
- Work Scope Changes are less transparent and defined, made at the 'discretion' of PJM.
- Start date of suspension periods per project should be made public

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