

All projects in AE1-AG1 should put 50% of the \$4k/MW at risk at some point relatively early (maybe within 30 days of the initial re-tool?). For fast track projects, this should possibly even be 100% at risk. This forces more commitment to stay in the queue. Simple cash requirements have not been shown to be effective at thinning queues if there is no at risk component.

Support for PJM's Transition Fast Lane to push low hanging fruit (aka queued 'clean' projects) through the PJM Interconnection process as soon as possible. By design, PJM Fast Lane nominally applies to 50% more projects with de minimis upgrades than National Grid's Fast Track component..

E-Cubed Policy Option 2 is preferred because it honors existing interconnection commitments under the current tariff and provides a reasonable time lime for projects through AH1.

Tariff obligations to previously submitted interconnection requests must be respected. This includes evaluating previously submitted interconnection projects consistent with the network upgrade cost allocation rules in place at the time when those projects entered the queue.

Although we support PJM's proposal, it is critical for utilities that are bound by state laws to meet their state mandated renewable goals. Under any proposal, PJM should give priority to processing those projects that are being procured or developed to meet the respective state renewable mandates. PJM's transition to the new cluster-based process should ensure that those state laws are upheld and that the interconnection process does not impede any state mandated renewable goals and objectives.

PJM proposal has moved to a very workable position

We believe projects that entered the queue under the original framework should be allowed the choice to proceed under that framework. We cannot support the options presented since we believe they create unacceptable thresholds for "grandfathered" treatment

My company supports PJM's proposal, but add to the comments that a) PJM should include all upgrade costs except Interconnection Facilities in the calculation, and b) PJM should check with FERC that the \$5M threshold is okay. If a threshold is implemented, a \$/MW may be easier to implement from a regulatory standpoint. Affected Systems Studies need to be sequenced. Phase 1 - PJM should have indication of potential impact of Affected Systems by the end of Phase 1 study. Phase 2 - PJM or Affected System Owner should be able to confirm that there is an impact from Affected System owner by the end of Phase 2 along with a cost estimate/schedule if work is identified. Phase 3 - Affected System Study Report finalized. PJM need to provide more information on its website as to which queue projects are being delayed by Affected Systems issues along with which Affected System/TO is responsible. PJM and other ISO/RTOs (MISO, NYISO, DEP and others) need to better align their queue study cycles and timelines in order to more effective handle Affected System issues.

PJM's updated transition option will cause material harm to hundreds of projects that have been in the interconnection queue for years - lumping in these projects with new projects that entered the queue several years later is unacceptable. PJM needs to find a way to increase its throughput significantly or none of this will work.

PJM's current transition proposal has incorporated stakeholder feedback and looks very robust.

My company appreciates the efforts of PJM and all stakeholders to move the transition proposal to its current form. We believe the current PJM proposal incorporates stakeholders inputs to reach the consensus (CBIR process). However, the goal of this task force is to develop revisions to effectuate meaningful queue reform. That goal is ultimately achieved by implementing the new, steady state generator interconnection process in a timely manner as possible. To accomplish this, the current transition proposal can be improved to shorten the transition timeframe by approximately 6-8 months. To accomplish this we recommend making the following changes: 1) “Grandfathered” sequencing process scope - revert back to limiting eligibility to legacy projects with zero impacts – see top line in attached chart 2) If (1) is accepted, then the risk of model changes between the grandfathering sequencing process and transition cycle 1 should be minimal and the transition cycle 1 can begin earlier/shifted to the left to execute concurrently with the grandfathering sequence processing – see second line / transition cycle 1 in the attached chart 3) New Process Cycle 1 Scope – the scope of the first cycle under the new process should include all projects from AG2 forward – AG2 and AH1 should not be part of an independent queue in the transition sequencing to move to the new cycle – the goal of this entire exercise is to move to the new process as soon as possible / processing of AG2/AH1 queues has not commenced and therefore no rights, costs or expectations under the current/effective GI rules are in place and these projects should be moved to Cycle 1 of the new process to facilitate meaningful queue reform – this first cycle under the new process would be moved to the left in line with the shift of the transition cycle in line 2 in the attached chart - see third line / Cycle 1 new process in the attached chart 4) Cycle 2 of the new process would also be shifted to the left in line with the shifts of the transition cluster and cycle 1 of the new process – see line 4 of the attached chart 5) Meaningful Queue Reform - The above changes to the current proposal will facilitate the initiation of the new process 6 -8 months sooner than the current transition proposal enabling cycles 1 and 2 of the new process to begin in early 2024 and 2025 respectively – a process that delays the commencement of the new process beyond these timeframes arguably contravenes the goal of meaningful queue reform – see overall attached chart compared to the chart that reflects the current transition proposal

We are a bit concerned with PJM’s late compromise, which adds another transition cycle and therefore extends the time before we get to the new process for incoming projects. If PJM could administer it, we would likely prefer the NRG proposal discussed. It’s not clear to us whether PJM could perform the transition cycles included in the E-Cubed proposal and still get to opening the queue to new projects as E-Cubed presents a timeline; we would appreciate knowing whether PJM thinks that timeline is realistic.

There should be some advantage (cost or timing) for those projects that are already in the queue (AH2+) and patiently waiting for all this to be sorted out - right now there is no advantage for AH2+ projects over projects that will apply for the first cluster in the new process.

It would be good for PJM to clarify that the schedule could change based on how many ICs go to fast track.

The PJM proposal represents a carefully crafted consensus designed to avoid FERC protest and that any change to it could blow up that consensus and lead to vigorous FERC protest

We believe \$50m limit is discriminatory

We think the \$50m limit is discriminatory so cannot support it.

<p>We cannot support any proposals that do not provide the ability for late-stage AE projects to continue forward with the current serial process.</p>
<p>We prefer that PJM hires the staff and puts in place the processes that are necessary to maintain the existing process for all projects AG2 earlier. As a power generation developer we make substantial investments under a set of plans and rules at that time. Changing the rules retroactively has the potential for diminishing or destroying these investments. If PJM is set on making a retroactive change the only one we can support from a high level is the E-cubed solution since it somewhat mimics the existing process by allowing the IC to choose the serial (existing) or cluster route. However, we would need to see the complete details of the E-cubed solution before we can provide a definitive approval on it. We do believe higher readiness deposits from what's currently in the Tariff can help make the queue process more efficient if PJM has the staff and processes in place to accommodate such efficiency.</p>
<p>PJM's proposal represents an acceptable compromise among a broad range of stakeholders. E-Cubed proposed use of ISAs to preserve queue priority has been roundly rejected by the TOs and PJM, and the National Grid proposal represents an earlier version of a PJM proposal that received less consensus and support. The best way to avoid continued churn and a FERC protest is to support PJM's current proposal and not divert from it.</p>
<p>PJM has worked hard to gain consensus with the stakeholders over the past few months and the PJM proposal is the best one with hopefully the least resistance to getting approved going through the remainder of the approval process.</p>
<p>Support for PJM's Transition Fast Lane to push low hanging fruit (aka queued 'clean' projects) through the PJM Interconnection process as soon as possible. By design, PJM Fast Lane nominally applies to 50% more projects with de minimis upgrades than National Grid's Fast Track component.</p>
<p>We want AG2-AH1 to be included</p>
<p>PJM states one goal of the transition mechanism is to allow projects to proceed under existing rules but may be delayed due to timing of other projects. The current Fast Lane Criteria of being cost allocated for any upgrades that are less than 5M fail to meet this tenant. Projects that have minimal cost allocation (less than 5M) but share a very small impact on significant upgrades (&lt;5M) are not provided a path to proceed to an IA prior to 2025 and are economic and viable. The PJM arbitrary threshold of allowing 5M upgrades to move into the fast line provides a path to an IA earlier for later queued projects (AF1&amp;AF2&amp;AG1) with potentially higher cost allocation. This is unduly discriminatory to projects with higher queue priority and will risk negative FERC scrutiny when the queue reform is filed. Recommend PJM define a cost allocation threshold that has a de minimis impact on total upgrade cost allocation. (50K/MW has been suggested). If PJM requires a sufficiently stringent at-risk requirement for the NU cost allocation, projects will have a path to an IA prior to 2025 and PJM will not have to retool for withdrawals. Further, the size of the second transition cycle may be too large to solve. The combined megawatts included in the AG2 and AH1 groups are in excess of 100GW. PJM system peak loads are nearly 170GW. Recommend that the second transition cycle include AG2 only.</p>
<p>We believe projects that entered the queue under the original framework should be allowed the choice to proceed under that framework. We cannot support the options presented since we believe they create unacceptable thresholds for "grandfathered" treatment</p>
<p>The PJM proposal represents a carefully crafted consensus designed to avoid FERC protest and that any change to it could blow up that consensus and lead to vigorous FERC protest</p>

My company supports PJM's proposal, but add to the comments that a) PJM should include all upgrade costs except Interconnection Facilities in the calculation, and b) PJM should check with FERC that the \$5M threshold is okay. If a threshold is implemented, a \$/MW may be easier to implement from a regulatory standpoint. Affected Systems Studies need to be sequenced. Phase 1 - PJM should have indication of potential impact of Affected Systems by the end of Phase 1 study. Phase 2 - PJM or Affected System Owner should be able to confirm that there is an impact from Affected System owner by the end of Phase 2 along with a cost estimate/schedule if work is identified. Phase 3 - Affected System Study Report finalized. PJM need to provide more information on its website as to which queue projects are being delayed by Affected Systems issues along with which Affected System/TO is responsible. PJM and other ISO/RTOs (MISO, NYISO, DEP and others) need to better align their queue study cycles and timelines in order to more effectively handle Affected System issues.

We support the AG2-AH1 Cluster

Due to the removal of AH2 from Transition Cycle #2 we can no longer support the PJM proposal. This arbitrary bifurcation is unlikely to withstand legal review at FERC and may result in a prolonged compliance process resulting in further delays.

We would have otherwise voted for PJM's Transition Option on the notion that the Blackout period is confined to a 9-month period. With the inclusion of the Second Serial Transitional Queue, the Blackout period will be extended further, and unnecessarily delay the onset of the new process designed to increase throughput on a timely basis. Therefore we abstain from voting in the Poll with the interest that the Second Transitional Queue is eliminated.

I think the transition queue of AG2 / AH1 is reasonable and appropriate to provide some priority to submissions that are complete.

We support the transition cluster for AG2-AH1

We support the PJM option but would also like to make a recommendation to consider the projects in the fast lane process which are willing to fund 100% of the NU and cost allocation identified in SIS with at-risk readiness deposit.

State jurisdictional projects should have access to the normal PJM queue process until an interconnection process for all such projects is established at the state level.

We prefer to stick to the current serial process and incorporate higher at risk readiness deposits to force ICs to make a quicker decision throughout the study process. Under no circumstance should any IC not have the option to stay with the serial process since that is what the Tariff stated at the time an interconnect filing was made. ICs/developers have too much at stake and plan accordingly for rules to change retroactively. We also recommend PJM hire more staff and pay them higher wages to assist in processing the work and providing info to the ICs. If PJM is going to make retroactive changes we recommend PJM remove the "suspension" possibility for projects with executed ISAs. Quite frankly we are very frustrated by PJM's actions to date.

State jurisdictional projects should be studied through the PJM cluster process until a state level interconnection process is established for all such projects.