



Compliance Update – Order 845 Generator Interconnection Reforms

Planning Committee
July 12, 2018

Final Was Rule effective on July 23, 2018

Compliance Filing is due November 5, 2018

Requests for clarification and rehearing were filed, including MISO, TOs and NYISO.

- Option to Build and Surplus Interconnection Service were thematic topics included in the various rehearing requests.
- Option to Build – expanded to allow IC to exercise option to build *at its discretion* with regard to TO's interconnection facilities and stand alone network upgrades.
- Surplus Interconnection Service – the Commission tasked the TP's to provide a process that allows an Interconnection Customer to utilize or transfer Surplus Interconnection Service at an existing Point of Interconnection.

"Low Hanging Fruit"- Little Work Needed For Compliance

Dispute Resolution: PJM will add a *new non-binding dispute resolution process* that allows disputing parties to unilaterally seek non-binding dispute resolution and requires TPs to appoint an independent 3rd party to preside over the proceeding.

Service Below Facility's Capacity: Allow IC to request a level of interconnection service lower than its facility's capacity. IC's are currently able to do so pursuant to the Interconnection Service Agreement.

Provisional Service: TP must allow for provisional interconnection agreements that permit limited operation of a generating facility prior to completion of the full interconnection process. IC's are currently able to request Interim Capacity Interconnection Rights pursuant to the Interconnection Service Agreement.

Technology Changes: PJM will create a definition of "permissible technological advancements" that would not constitute a material modification. IC's are currently permitted to change the technology included in the interconnection request at any point in the study phase.

- “Low Hanging Fruit”- Little Work Needed For Compliance

Study Models and Assumptions:

PJM currently lists study processes and assumptions for forming network models used for studies which are available to IC subject to appropriate confidentiality and information requirements on password-protected website. PJM will ensure such information represents data used during the most recent interconnection study and representative of current system conditions.

Definition of Generating Facility: PJM will revise to include electric storage resources.

- Expect Moderate Work Needed For Compliance
- Contingent Facilities: TPs must publish method for identifying contingent facilities in Tariff's interconnection procedures.
- Reporting Requirement: TPs required to post interconnection study metrics on a quarterly basis. No automatic penalties for delayed studies.

- Issues That May Require More Discussion

Surplus Interconnection Service – the Commission tasked the TP to provide a process that allows an Interconnection Customer to utilize or transfer Surplus Interconnection Service at an existing Point of Interconnection.

Option to Build – expanded to allow IC to exercise option to build *at its discretion* with regard to TO's interconnection facilities and stand alone network upgrades.

- PJM will schedule a half-day Special Planning Committee meeting to focus on the issues that may require more discussion.