

Proposal Concerning Review of Interconnection Customer Drawings

Markets and Reliability
Committee

October 12, 2011

- Various points when Interconnection Customer (IC) must submit drawings for review
- Seek to clarify the Interconnection Construction Service Agreement (ICSA)
 - Appendix 2, § 2.1.2
 - Appendix 2, § 3.2.3.8

2.1 – Interconnection Customer Obligations . . .

2.1.2 Interconnection Customer Drawings:

On or before the applicable date **specified in the Schedule of Work**, Interconnection Customer shall submit to the Interconnected Transmission Owner and Transmission Provider initial drawings, certified by a professional engineer, of the Customer Interconnection Facilities. Interconnected Transmission Owner and Transmission Provider shall review the drawings to assess the consistency of Interconnection Customer's design of the Customer Interconnection Facilities with **Applicable Standards and, to the extent that design of the Customer Interconnection Facilities is included in the Facilities Study, also shall assess the consistency of Interconnection Customer's design with the Facilities Study**. After consulting with the Interconnected Transmission Owner, Transmission Provider shall provide comments on the drawings to Interconnection Customer within forty-five (45) days after its receipt thereof, after which time any drawings not subject to comment shall be deemed to be approved. All drawings provided hereunder shall be deemed to be Confidential Information.

- Date for submitting initial drawings is not typically included in the Schedule of Work
 - Proposed Clarification: Link the submission of the initial drawings to the ISA milestone for substantial site work.
- PJM's analysis against design in Facilities Study is not appropriate
 - Proposed Clarification: Analysis against the proposed Customer Interconnection Facilities as analyzed in the planning model

- PJM's analysis against Applicable Standards (which includes other organizations standards) not in line with PJM's focus on impact of IC's Interconnection Facilities on RTO (e.g., stability, short circuit, gen deliverability impacts)
 - Proposed Clarification: Same as above – analysis against the proposed Customer Interconnection Facilities as analyzed in the planning model

3.2.3 – Option to Build . . .

3.2.3.8 Interconnection Customer Drawings:

Interconnection Customer shall submit to the Interconnected Transmission Owner and Transmission Provider initial drawings, certified by a professional engineer, of the Transmission Owner Interconnection Facilities and/or Merchant Network Upgrades that Interconnection Customer arranges to build under the Option to Build. **The Interconnected Transmission Owner and Transmission Provider shall review the drawings to assess the consistency of Interconnection Customer's design of the pertinent Transmission Owner Interconnection Facilities and/or Merchant Network Upgrades with Applicable Standards and the Facilities Study. After consulting with the Interconnected Transmission Owner, Transmission Provider shall provide comments on such drawings to Interconnection Customer within sixty days after its receipt thereof, after which time any drawings not subject to comment shall be deemed to be approved. All drawings provided hereunder shall be deemed to be Confidential Information.**

- Important: this is under an Option to Build where IC elected to build the Transmission Owner (TO) Interconnection Facilities.
- Currently, and appropriately, TOs review the drawings of the work on the TOs' facilities.
 - Proposed Clarification: delete Transmission Provider (TP) from sentence re: review of drawings.
 - Make conforming change to 3.2.3.9

- PJM's role as TP will remain to facilitate resolution of any disputes re: the drawings
 - Proposed Clarification: with re: to providing comments after review - remove "After consultation with TO, TP shall provide comments" and simply state "TO or TP shall provide comments . . ."

- Seek MRC endorsement on Nov 16, 2011
- Preview with MC on Nov 22, 2011
- Seek MC approval in Jan 2012