

### New Service Request Deficiency Review

#### **Problem / Opportunity Statement**

Interconnection Customers submitting Interconnection Requests at the end of a New Services Request Window may not be granted 10 business days to resolve all identified deficiencies. This change was implemented as a result of the Earlier Queue Submission Task Force (EQSTF) and was effective starting with the AC2 queue, which opened November 1, 2016.

PJM has observed an increase in the number of Interconnection Requests that are terminated and withdrawn since implementing EQSTF changes. Specifically, Interconnection Customers who submit their Interconnection Request at the end of the New Services Queue are not given an opportunity to clear deficiencies in their request prior to the close of the New Services Queue and, therefore, their Interconnection Request is withdrawn from the queue. Since the AA1 queue, which opened on May 1, 2014, 50 - 60 percent of Interconnection Requests are submitted to PJM during the last month of the queue. Prior to the EQSTF changes, approximately 18 percent of projects submitted in the last month of the queue were withdrawn for deficiencies. After implementation of the EQSTF changes, the rate of Interconnection Requests withdrawn for deficiencies increased to 24 percent.

OATT, section 36.1.01 defines the following process regarding deficiencies for Generation Interconnection Requests:

- PJM shall have 5 business days from the date of the Interconnection Request to review the request for deficiencies.
- The Interconnection Customer shall have the lesser of 10 business days from notice of the deficiency by PJM or the last day of the New Services Queue to resolve all deficiencies.
- PJM shall have 5 business days after the Interconnection Customer's response to review the updates.
- Failure to resolve all deficiencies will result in termination of the Interconnection Request.

Similar language appears in section 36.1.03 for Transmission Interconnection Requests and sections 110.1, 111.1, 112.1, and 112A.1 for small Generation Interconnection Requests.

If a customer enters the queue 5 days prior to the close of the queue or later, there likely is no ability for the customer to clear the deficiencies.

#### **Issue Source:**

RTEP Interconnection process existing challenges identified in the problem statement were observed during the past four interconnection queues, AC2, AD1, AD2, AE1.

#### **Stakeholder Group Assignment**

PJM proposes that this issue be addressed at the Planning Committee.

#### **Key Work Activities**

PJM will present challenges with queue study timing and identify potential changes to address the cure period.



## Problem Statement & Issue Charge

### **Expected Deliverables**

PJM is also presenting draft Tariff language to the Planning Committee in order to file no later than June 1, 2019.

### **Expected Duration of Work Timeline**

This is a high priority item that should be addressed immediately.