

- It would be helpful if PJM could provide a calendar with the timeline and the transition plan for each proposal. It would also be beneficial to provide site control requirements under the new process and how it is applicable between cycles.
- Modify #1 proposal to expedite AE1 and earlier as a separate first cluster moving into phase 3
- This poll is inappropriately early given that there is no indication that the envisioned proposal is the one that we will be transitioning to. Without a clear target policy in place and the details thereof, any questions about transition mechanisms are premature.
- We view both Options 4 and 5 as viable transition plans. In any case, PJM and the TOs should focus as much attention as possible to getting current facility study backlog processed up to the effective date. A limited waiver on keeping the current or next study window open, or delaying processing of the new requests in the AH cycles, for an additional 6 months could free up PJM and TO resources to assist with this. Some further topics related to the transition that PJM should investigate are indicated below:
 - Consider some security requirement for 'grandfathered' projects continuing under existing rules. There are many legacy projects in very early queue cycles that will continue to exist in the study stages at time of queue reform being made effective and an effective way to deal with these generators will be needed to avoid significant delays in processing any 'grandfathered' requests.
 - Consider allowing some 'grandfathered' eligible projects to elect to proceed in first cycle to be processed in new process
- We have the following specific comments on the Draft Transition Proposals:
 - 1. Draft Transition Proposal No. 2
 - a. We ranked this proposal #1 as we invested heavily early in the PJM queues, and selected projects based on the current interconnection process. Moving our queue projects to a new PJM interconnection process would materially harm these projects as we would lose its advantageous queue position. The projects we developed are tailored towards providing the cheapest cost of power pricing to the market under the old rules. Additionally, moving AG2 into the new method of cost allocation, will harm our investments. Not only the millions we have invested, but also will harm the landlords that we are working with, which are predominantly large land holding companies.
 - b. We fully support PJM utilizing the balance of calendar year 2021 and first half of 2022 to focus on clearing up the current Facilities

- Study backlog, with the goal of being able to commence the AG2 Feasibility Study process sometime in early or mid-2022.
- 2. Draft Transition Proposal No. 4
 - a. We ranked this proposal #2 in that it would be acceptable to us if its AG2 queue projects are studied under a new “cluster study” process (Draft Transition Proposal No. 4) provided that there is certainty the AG2 queue projects will begin the Phase 1 study process by April 2022 and complete the process cycle by 1Q 2024.
 - b. If AG2 queue projects are moved into a new cluster study process, it is very important that AG2 be designated as its own separate study cycle.
 - c. It is extremely important to us that its AG2 queue projects receive their ISAs by early 2024 so that these projects can achieve a 2025 COD to take full advantage of U.S. federal tax credits/incentives.
 - 3. Other Points
 - Under no circumstances should AG2 queue projects be co-mingled or combined with AH1 and AH2 queue projects in a new cluster study. This is a “red line” position for us for the reasons outlined in 1 (a) above.
- Comments on Q3: Yes if option 2, 3, and 4 are heavily weighted, No if 1 or 5 are considered Comments on Options. PJM to study projects up to AG2 per the old rules, but consider amending to include strict guarantees in way deposits or security during the interconnection process. Any transition mechanism or new process should not reduce the time by which an ISA is to be executed from the issuance. Thirty days is the preferred minimum execution time of an ISA.
 - Our first preference is: keeping queue cycle groups all the way through AH1 and AH2 groups in the current process, and having the AI1 queue group being the first queue. Please see more detailed explanation below: Regarding the transition, We support going one queue cycle beyond the AG groups to ensure the AH1 and AH2 groups aren't left in a group with an unknown path be it a transition group or under an entirely new regime. There has been a lot of work to advance certain projects to a stage where they can enter the current AH1 queue and have been working in preparation to meet the necessary requirements to enter the AH2 opening in October. Pushing AH1 and AH2 out of the existing study methodology would threaten capital already expended. Signaling that these projects will be subject to an uncertain future and lost capital is something we would like to avoid. We are supportive of having the AI1 queue being the first queue that will be subject to the transition provisions that will likely come out of the January 2022 queue reform deadline.

- 1. There should be clear criteria for being in or out of the groupings. 2. Excluding AG1 from the existing queue is acceptable, in that there was information that things would change - they can still remain in new process. 3. We are concerned that any new process development will slow the progress on existing queues
- We do not support an expedited stakeholder process for reform in parallel with the full CBIR process. This will just detract from the positive momentum currently in the full CBIR process. We support the transition proposals that contemplates applying some or all the new processes to new requests. If the TOs and PJM must work through all ~2,000 requests before implementing the new process, the backlog will not be alleviated in the near term, and it may be many years before the first cycle of the new process starts.
- Note on ranking: We do not endorse any of these options. Options 4 and 5 are closer to our preference but still need modification, as described below.
 - Overall recommendations:
 - 1. Increase deposits, requirements, tighten timelines for all projects - even those using the existing process.
 - 2. Identify a very small group of late-stage projects that can be studied using the existing process, consider allowing them the option to be studied using process described in #3.
 - 3. Take the majority of the existing projects and bundle them into expedited phase-specific groups. Include AH1 and AH2 in first Phase 1 cluster.
 - 4. Do not take interim action - it will distract attention from developing holistic reform.
 - 5. Better define what it means to "hold the queue open" before asking members to consider any action.
 - Ensure that AH1 and AH2 are not treated in a discriminatory manner.
 - Discussion: If any subset of projects are allowed to continue to be studied sequentially, there are actions that PJM should take to ensure these are commercially feasible projects and are moving at a reasonable pace. This can be achieved through changes to requirements (e.g. increasing deposits, tightening site control needs, reducing wait time, one POI per project, etc). These changes will be critical to ensure PJM actually can clear the backlog. All projects, regardless of whether they will use the existing process or new process should be asked to meet more stringent requirements. The amount of projects allowed to continue under the current tariff should be minimized as much as possible. Option 5's suggestion of limiting this to AD2 or earlier is a good one. Some of these

late stage projects may WANT to transition to a late phase of the new cluster process because they see opportunity to benefit from the cost allocation approach, so PJM might consider giving them the option to either stay the course or enter the phase 3 group. If PJM decides to create clusters at various phases from existing projects, it's going to be important to understand how many projects PJM can study at a time and design ways to study them efficiently. If each phase's cluster can be maximized in terms of volume, the backlog will be processed more efficiently. For example, in Option 5 there are two groups of projects that will be transitioned to phase 3 (AE1/AE2 and AF1/AF2). If these could be combined into one large phase 3 group it would expedite the process, but the size might make it unwieldy. PJM could consider creating a large Phase 3 group (AE1/AE2/AF1/AF2) but subdivide it by TO territories and have all subdivided groups studied at the same time, or some other modified action that will allow it to process more projects concurrently. Interim actions and/or a waiver for AH1, AH2 and potentially subsequent groups (depending on timeline for filing changes) should only be pursued if they are not discriminatory. These projects cannot be put in limbo without any tariff guidance on how they are going to be treated and when they will be processed. A targeted waiver that allows PJM to continue to accept AH1/AH2 interconnection applications but pause on processing them with the specific goal of including them in the first Phase 1 cluster could be acceptable. A waiver that "leaves the queue open" without defining when it will be closed and how these projects will be treated upon that close is unacceptable. For this reason we have indicated "no" for question 3 -- we need more detail before endorsing.

- Thank you for taking input and PJM's leadership on rapidly cleaning up the queue. Speaking to the Transition, we support bringing AF1 and later queues into new rules. Proposal 4 comes closest to this option. Projects that are well along in study could be unnecessarily delayed by bringing under new rules which is why we prefer leaving AE2 and earlier under the old regime. We strongly prefer to avoid processing all past queues under the old regime – such approach continues the current extraordinary delays. When bringing older queues into the new regime, we want to understand better the effects of consolidating queues to minimize unnecessary triggers of additional restudies. Finally, speaking to our responses in #2, we want to clarify our response: we wish for PJM and stakeholders to consider on a case by case basis what gets taken up via expedited process. Expedited processes should not be used widely, but only in cases such as the topic under #3 where stakeholders have already discussed and weighed in via polling, etc. and identified a need to act quickly outside of the IPRTF.
- Prefer 1 then 5. Ranked 2/3/4 in numeric order after 1&5 due to forced ranking.

- We believe that the only valid options at this time are Proposals 4 and 5. Proposals 1-3 are infeasible because they will delay the solution implementation and take years to complete the facilities study. The backlog needs to be transitioned to the new rules sooner rather than later. PJM has provided estimates of how many projects they expect to complete per year, but those will be extremely difficult to reach. With the congestion of the queue the solution creation and power flow analysis will be more and more difficult, and throughput will likely decrease rather than increase in the future. Proposals 1-3 will likely take 10+ years to eliminate the backlog. We would suggest altering Proposal 4 to keep only projects through AE1 or AE2 under the existing rules and then transition AE2/AF1-AG1 as Cycle 1. Then AG2 and AH1 would be Cycle 2. This would speed up the transition as PJM would not have to process AE2 and AF1 in the serial process. AE2 has a significant increase in Facilities Studies still needing to be completed and it is a natural cut off point. Proposal 5 is also a feasible option to consider but it is creating an uncompetitive playing field. Smaller developers do not have the same capital available that larger corporations with larger balance sheets have. Enacting proposal 5 will create an advantage to larger interconnection customers, it is unfair. One other option to consider would be to allow projects with no System Upgrades or Contribution to System Upgrades to stay in the queue even if they are AG1 or AG2 projects. For example, since PJM did not announce the queue reform effort until after the AG2 submission window closed, they could agree to perform the feasibility study of AG2, if any projects do not have network upgrades they can move forward in the serial process. After this follow through with Proposal 4 or Proposal 5.
- We ranked Option #4 as the superior option in the list provided by PJM, but we also strongly encourage consideration of a “ready lane” or streamlined path forward for projects as part of the transition process. Ideally, this process would allow projects that have received study results that indicate limited to no network upgrades, and are prepared to meet “readiness milestones” such as posting anticipated fees for the system upgrade portion of the interconnection costs, could be entered into a streamlined workflow of projects that complete study (if required) and third-party PJM agreement process under the current process or a transitional serial queue. This would move real, non-speculative projects forward in the queue and potentially relieve some queue congestion, while allowing developers a streamlined path forward that doesn’t require a cluster study in the new process. This “ready lane” process could require that projects have received Feasibility Study results before a request to be in the “ready lane” can be made.
- We would like to underline the importance of distinguishing AG2 and AH1 from AH2I. AG2 is already in the Feasibility Study phase, and the AH1 queue window is currently scheduled to be closed on September 10th, with 61 projects submitted as of 8/11. Since there are no activities with the AH2 queue, it is prudent to distinguish AG2 and AH1 from AH2 when transitioning into the new cluster/cycle rules.

- Follow the rules in M34!
- Transition to new process as soon as possible.
- 2. This entire subject deserves the full CBIR process. 3. Holding the current queue open is fine but there needs to be a defined close date, in case there is no timely action at FERC. It should be a date or a fixed number of days beyond a well-defined milestone. "Timely completion of the current backlog" is not definitive. If you mean the completion of the current backlog, say that. MOST IMPORTANT: It is impossible to determine which transition plan is best without knowing what the proposed end state is. I realize PJM is succumbing to the powerful pressures to discuss transition so early but makes no sense but for such appeasement.
- On Draft Proposal 5, the diagram states "If ISA is drafted maintain status quo". How do we know if our ISA is drafted? Are there projects in AD2 that do not have the ISA drafted?
- I appreciate PJM's work involving the different stakeholders in this process. As I have reviewed the different options and heard comments from others, I have become aware of two things: 1) the new system may not take effect for many months; and 2) the new system may not apply to many projects in the queue (as the poll options show).
- Accordingly, it is especially important that PJM work to issue Facilities Studies and ISAs for its backlog of late stage projects. PJM should consider minor changes to speed up the issuance of ISAs, including: a) completing frequent re-tools when projects drop out; b) prioritizing re-tools and ISAs over feasibility and impact studies; c) requiring the posting of ISA security earlier (a few different options for this – perhaps the developer would have to post security shortly after receiving the Facilities Study, and THEN they have 45 or 60 days to sign the ISA). It seems like a lot of time goes into the milestone schedules and other administrative parts of the ISAs.
- This week I was following up on the Facilities Study/ISA for a project that was due to receive it a few months ago. I know that a draft of the Facilities Study exists, but it hasn't been shared with us. The PM told us that it would be delayed further because earlier projects' System Impact Studies were taking priority. Given the "serial" nature of PJM's current process, it is vitally important that ISAs be issued so that projects make investment decisions that affect future projects. I understand that the study teams are busy and they are dealing with multiple queues, but it does seem backwards to me to put later stage projects at a lower priority and further delay the ISAs. The fact that so many facilities studies are late actually make those very Impact Studies less accurate and less useful to the developers.