



PJM IPRTF Non-Transition Issues Package



Clearway



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Issue #7 – Project Information – Claiming CIRs

Status Quo: as part of Application, IC to provide MWs requested for CIR and Energy, site plan, single line

PJM Proposal: Any claiming of CIRs from deactivating units must be concurrent with the application

Clearway Proposal: With respect to claiming CIRs from deactivated units or repowers, CIRs should be able to be claimed via Necessary Study Agreement (evaluation), and Scope Change by the original interconnection customers, provided there is an agreement in place that there won't be duplication of the CIRs in the model or on the system at any time. A new interconnection application should not be necessary.

Issue #8 – Application Requirements - POI – Shared Facility Agreement

Status Quo: Shared Facility Agreement is not required as part of Application

PJM Proposal: Shared Facilities agreement provided up front if behind an existing POI

Clearway Proposal: New requests behind an existing POI should only require a simplified consent agreement prior to Phase 1 that does NOT need detailed shared facilities agreement. Draft Shared Facilities Agreement can be requested prior to ISA execution.

Issue #19 – Feasibility Study - Interconnection Queue Models

Status Quo: Uses most recently completed RTEP case (e.g. AG1 uses 2024 RTEP)

PJM Proposal: Preserve status quo

Clearway Proposal: Consolidated planning model should be used for generation interconnection studies. If there is a new overload identified in the RTEP case, cost for such overload should not be assigned to Interconnection Customers. The baseline reliability upgrades should be included in the model.

Issue #32 – SIS Requirements - Interconnection Facilities – Cost/Schedule

Status Quo: Attachment Facilities and physical interconnection scope, cost, and schedule - planning level estimate

PJM Proposal: Transmission Owner to perform Facilities Study for Interconnection Facilities

Clearway Proposal: IF cost and schedule should be binding or at least binding to +/- 15% accuracy to provide IC cost and timing certainty. If cost exceeds the cost estimates from Phase 1 by more than 15%, TO need to provide detailed reasons behind that, and have some cost share responsibilities for the increased cost beyond the 15% of the original estimate.

Issue #36 – SIS Requirements - Affected Systems Study & Coordination

Status Quo: PJM performs a high-level evaluation and coordinates modeling and other information with the neighboring potentially affected system, the neighboring system responds to PJM with the outcome of any affected system requirements

PJM Proposal: Preserve status quo

Clearway Proposal: PJM to commit to a timeline for completion of Affected System study – proposed timeline below. Queue reform needs to address coordinated planning process with affected systems

Proposed Timeline:

- Scoping Meeting – PJM identifies potential Affected Systems
- Phase 1 - PJM should have indication of potential impact of Affected Systems by the end of Phase 1 study
- Phase 2 - PJM provide finalized Affected System Study Report at the end of Phase 2 Study

Issues #60 and 61 – IC Decision 1 - Project Modifications – Permissible Technology Advancement and Non-Permissible Technology Advancement

Status Quo:

- Permissible Technology Advancement: Allowed before execution of FSA
- Non-Permissible Technology Advancement: Allowed before execution of FSA; Studied for material modification within 30 calendar days

PJM Proposal:

- Permissible Technology Advancement: Allowed before the start of Phase 3 at either Interconnection Decision 1 or 2
- Non-Permissible Technology Advancement: Allowed before the start of Phase 3 at either Interconnection Decision 1 or 2

Clearway Proposal: Equipment changes should be allowed if no material impact

Issue #62 – Project Modifications - Fuel Type Changes

Status Quo: Studied for material modification

PJM Proposal: Not permitted

Clearway Proposal:

Preserve status quo, with detail below

- Single Fuel: Wind/solar -> battery, vice versa. Similarly, would like to have some flexibility - at a minimum, want it to be studied for material modification.
- Mixed Fuel: Wind + battery, solar + battery --> maintain the same capacity (interconnection service level), allow flexibility to adjust MW sizes among the technology - prior to certain interconnection milestones; still evaluate them for material modifications. Pre-wire a path for fast tracking the evaluation. Allow ICs to submit their evaluations to support PJM's fast-track evaluations. Establish what automatically constitutes materials
- Fuel adjustments (MFO reduction in either fuel type) in the MFO in hybrid facilities should be allowed with no restriction as long as it has no adverse impact on the other competing projects or on the system

Issue #86 – ICSA - Suspension Provisions

Status Quo: 1 year or 3 years if not material to other projects

PJM Proposal: Not permitted. Issues outside of the customer's control will be dealt with using the ISA/CSA milestones

Clearway Proposal: Suspension for 3 years is allowed for DA or non-shared network upgrades. Shared upgrades must be funded during suspension period. Suspension request to be evaluated under an MMA to ensure no impact to other prior or later queued projects. Adjustments to COD should be allowed subject to MMA evaluation but should be limited to a set timeline (for example, 7 years from queue entrance)



THANK YOU

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