

**Note:** Identifying company names have been removed to maintain confidentiality.

We support IC choice, but not the options that sweep all late-stage projects into clusters upon FERC order approval. We believe the stakeholder group can work to optimize between the various IC choice options.

PJM Option #4L: Recommend strict readiness requirements (higher bar) for projects opting for projects opting to stay in the existing cost allocation paradigm.

The transition process must move to the new generator interconnection process as quickly as possible. PJM option 2 is the best solution to accomplish this goal. Option 3 with certain modifications may be reasonable. All other proposal timelines take far too long and do not facilitate effective queue reform, and actually perpetuate the current problems this initiative is trying to address. Accordingly, we only support PJM options 2 and 3, subject to the following comment on the E-cubed proposal, which would be reasonable if certain aspects were changed as describe below. With respect to the E-Cubed proposal, we cannot support it as proposed because it includes the option to choose between serial and transition cluster processing. Furthermore, it proposes performing serial clustering in parallel with transition cluster processing. The optionality and parallel processing timelines presented in the proposal are unrealistic and will result in delays to the effective date of the new process. To the extent these are removed from the E-cubed proposal, it would have merit like PJM option #2 proposal.

To facilitate the transparency and evaluation of the effectiveness of the interconnection process change, we request that at the monthly Planning Committee meetings, PJM provide updates on the following metrics: 1. Number of projects left in the queue 2. Number of projects PJM has processed 3. Number of projects that have withdrawn from the queue 4. Estimate of number of projects that will remain backlogged by October 2022 5. Number of projects that remain in each study phase. We also request that PJM provide an estimate for how these metrics will impact the blackout period for each PJM option.

a. We suggest elimination of Transition Cycle #1 for PJM Optional Option #4 would be prudent. If AE1-AG1 projects are not prepared to meet the site control and financial milestones in their natural course as shown in Option 4 Optional Option, they should not be given a pass to delay their projects. All projects should be forced to proceed or get out to help eliminate backlog. Removing the transitional cluster shortens the time to clear the process. b. We reiterate the need for early TO involvement for projects for POI/gen tie site control discussions. These requirements cannot be set in a way that forces customers to work on site control absent feedback on appropriate parcels. c. PJM needs to push hard to get Phase 2 and facility studies done faster than 6 months before we will let higher security requirements and more stringent site control go to FERC unchallenged. This is necessary to be responsive to C&I and state interests for rapid decarbonization. d. Penalty free withdrawal needs to be included if costs increase significantly from one study phase to another. This allows an off-ramp for a customer whose project is made unviable by increasing costs to get out of the queue in a timely way, rather than lingering to try to make something work since deposits are forfeited if they leave. SPP and MISO have similar penalty free withdrawal provisions to protect customers from significantly increased interconnection costs. e. Air/water/land/fuel permits should continue to require an application, not the receipt of permits. To require the full permit will put the development process significantly out of order. Certain permits request information about your interconnection impacts and are not received until close to/during construction. This is even more true in PJM states where permitting is much more complex and time consuming than in regions like SPP and MISO. f. Suspension of 1 year should remain to help with construction sequencing in light of complex permitting requirements in PJM states. Posting of 100% security mitigates risk of late stage withdrawals to other customers. g. PJM needs to treat all security as “at risk” rather than non-refundable. A security deposit should not be forfeited if no harm is done to other customers by withdrawing. If security is forfeited with no clear beneficiary, it would represent a windfall to PJM that would need to somehow be allocated to fund something, which is not an appropriate or acceptable outcome.

All later queued projects that choose the transition serial process and that contribute to the same overload as the first to cause should receive a cost allocation per current cost allocation rules. All projects up to and including AG1 queue should be issued an SIS report prior to making decision on whether to proceed to serial transition or cluster study.

Any closed application window could be problematic.

We support IC choice. Late stage projects, with Impact Studies, should not be swept into the transition clusters.

We appreciate that the options presented attempt in different ways to balance the need to clear the queue and fairness to participants. At this point in time we strongly suggest that clearing queue should be the priority or new generation development will be significantly delayed, resulting in resource adequacy and other market issues.

Do not prefer any of the transition options. Projects that have already filed under the existing interconnection rules should not have to reapply.

As noted above, we prefer the Geenex proposal as it allows for the most flexibility and IC choice across the AE1 through AH1 queues. We could also support the other options noted above, provided that aspects of each proposal are modified to provide full IC choice. We see IC choice as the most critical factor in evaluating the various options.

Our primary concern is the underestimated transition processing time and expediency in processing the queue backlog. PJM stated that 300 Facilities Studies completed per year is feasible, but that is not the correct metric to understand timing risk. PJM must instead determine how many decision points can be completed per year. The issue is that there are many mechanisms in the Tariff and the proposals that allow the delay of the ISA execution decision. The 300 projects per year number is based on historical throughput of Facilities Studies with a grid that still had available capacity. However, we are now in a different paradigm. When projects are contributing to network upgrades they create a serial decision-making process, trapping interdependent projects behind the project triggering network upgrades. This begins with a retool and SIS Report development, then FAC Report Development, then ISA development finally with a 60-day window before the ISA decision is reached. The time between FAC Report completion to ISA decision point has historically been 65 days when looking at the last 35 projects in the queue to have executed ISAs. Once serial decisions pile up by triggering interdependent network upgrades, the duration between FAC Report and ISA decision point increases substantially for each project in the series. Factoring in time to retool the SIS and create the FAC can add roughly 90 days to the 65-day FAC-to-ISA timeline. This means that if there are just four projects that are waiting on serial decisions it will take nearly one year for all project decisions to be made. Adding more projects into a serial process exacerbates this issue. Even grandfathering in AD2 projects is too many. There must be some kind of time limitations to the decision-making process or else there is potential for the transition to take more than a decade. This problem compounds when looking at large network upgrades such as the Midlothian to North Anna rebuild in Virginia territory. The upgrade has 20+ active projects before AF2, which means there is potential for any transitional serial process regarding the upgrade to last 3-5 years depending on the number of projects electing to stay in the queue. These projects with cost allocation are currently some of the largest projects in the queue and they have a high likelihood of all electing the serial process even with very large financial security implications. When assessing these options, the stakeholder community must consider the situations that will create the most damage to the timeline. Focusing on the best-case scenarios sets up PJM interconnection customers for a complete standstill as all of PJM must wait for one or two major upgrades in congested areas like Virginia in order to proceed with an interdependent serial process. Some common ground between Option 2 and Option 4 should be considered. There should be time limits on decision-making or other ways to ensure that a reasonable transition timeline prevails. Projects in AF1, AF2 and AG1 being provided a choice will delay this process by many more years.

Only selected an option on #9 because there wasn't an option for "none of the above". PJM has an obligation to evaluate ALL previously accepted interconnection requests under the current serial queue process, even those that were submitted after the interconnection queue process changes were under development. We believe PJM should process all previously accepted interconnection requests under the existing serial interconnection process. All interconnection requests had a reasonable expectation that they would be evaluated and managed pursuant to the PJM governing agreements and the rules in effect thereunder at the time those requests were submitted and accepted. Any modification to those rules after PJM accepted an interconnection request is retroactive ratemaking and prohibited under the FPA. Adjusting the interconnection queue process rules after accepting interconnection requests will remove cost advantages to those interconnection requests accepted prior to triggered transmission system violations created by later queue requests. Requiring recently accepted interconnection queue requests (e.g. AH1) to be resubmitted under the clustered queue process violates PJM's obligation under its governing agreements to process those accepted requests, and potentially disadvantages those requests when they are evaluated through the clustered queue process for network upgrade cost allocations. While FERC, in some cases, will retroactively apply accepted rate revisions to transactions submitted after such revisions are under consideration at the Commission, it has a specific process for noticing market participants of the potential for such retroactive changes and provides a specific date after which such changes could be applied. Further those rate revisions are specific in that a clear proposed change to a filed rate is before the Commission for consideration that will either be accepted or rejected, allowing market participants and interconnection customers to make an informed decision based on potential outcomes. PJM has no such process, and historically has made any changes to its market rules and processes that come through the stakeholder process applicable on a forward basis relative to the date of any FERC filing (consistent with the FERC process), whenever possible. PJM's stakeholder process considers a wide variety of potential solutions when considering market rule and process changes. To require market participants or interconnection customers to make business decisions based on that array of possible outcomes because of the potential for retroactive application would create an extremely uncertain environment in which to do business. Retroactive application of changes under consideration in the stakeholder process, when such retroactive application can be avoided, is not a precedent we should set.

Option 4 is acceptable if the following changes are implemented: 1. Until the new process is initiated, and the first cluster group is opened for applications, interconnection queue applications received before then should continue to be received, reviewed, and evaluated through the current serial study process to the end, allowing ICs to ultimately sign ISAs. 2. For the backlog of generation projects in AG2, AH1, AH2 and possibly AI1 (queue study groups opened prior to PJM's implementation of the new cluster study process), shorten the process by skipping the feasibility study (for those projects interconnecting at transmission) and proceeding directly to the system impact study, if they have not started for that group. In our view, the feasibility study offers little value to ICs in determining whether their generation project has any significant network upgrades or schedule challenges. PJM, in its application to the FERC, should seek approval to bypass the feasibility study step for those queue groups that have a backlog and remain in the serial study process, thereby reducing the time to completely transition to the cluster study process. 3. While not a modification to the existing serial study queue process, we request that generation projects that have received their system impact study continue to be afforded the opportunity to proceed with interim ISAs at any time, without the risk of those signed interim ISAs subsequently being nullified or retracted because of the new cluster process. Preservation of the interim ISA option for projects that continue in the legacy serial queue process is important to our company in the optimization of risk and meeting our accelerated delivery of clean energy projects. Without enhancing Option 4 with these recommended changes, there could be a 1 to 2 year period where no ISAs are executed, which is unacceptable and place utilities and states at a high risk of not meeting their goals.

Critical to keep the efforts at the TO level to move through existing queue positions - up to AG1 - that have SIS and can move through the existing process. We may be in this situation where we have not established a new system for quite a while. We also have to worry about the impacts of affected systems studies on any of the transition periods.

We would like to request PJM to process as many projects as possible before the transition. If option 4 receives the majority, We would like to see more stringent readiness deposit criteria. This would help PJM with the number of projects staying in transitional serial for timeline certainty. Also, not providing an option to AG1 queue projects would improve the timeline in processing transitional serial projects.



We support PJM to offer IC choice through AH1, the queue group that opened prior to substantive PJM transition proposals, during the queue reform transition period. ICs willing to commit financially to NUs (in form of readiness deposits consistent across queue group, regardless of maturity) should be afforded choice to remain in the serial process in a sequence that preserves queue priority. Considering the high financial risk to remaining in the serial transitional process, we estimate relative few ICs will opt to remain (with majority either withdrawing or opting for transitional cluster), which will result in the efficient interconnection of projects in locations not requiring material upgrades, while clearing out the backlog and slotting projects with more complex upgrades into the cluster process for crowdfunding. Coupled with high readiness deposits, this will also result in an overall more efficient, less speculative queue, and encourage projects sited at robust grid connections will allow more efficient clean energy transition with less cost to rate payers. We also support the other transitional proposals that offer IC choice, but we believe they need not be limited to late stage projects.

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We cannot support any proposal that requires projects that have spent several years in the interconnection process to effectively start over. Millions of dollars have been invested in these projects and they will face significant harm if they are forced into a new process that will delay their ability to interconnect and open them up to new costs they would not otherwise incur. PJM should obtain sufficient resources to manage the interconnection process and if the fees that interconnection customers are paying are currently insufficient, then those fees should be increased accordingly.

While we do not support PJM option 4 in its current form, we are open to taking another look at this if PJM can make revisions to include additional requirements and Readiness Deposits to remain in the Classic Queue (similar to those in the Avangrid proposal). These provisions would further eliminate uncertainty for those opting to remain in the Serial Process and reduce the risk of numerous retools & restudies as a result of drop out.

State jurisdictional projects in states with no well established and reliable interconnection process (such as Pennsylvania) should be treated the same as FERC jurisdictional projects during the transition and under the reformed interconnection rules. It is highly discriminatory to leave these projects with no path to access to the wholesale electricity market, which is the case if there is no state level interconnection process and projects are not allowed access to the PJM queue. Additionally, we support IC choice, but not the options that sweep all late stage projects into clusters upon FERC order approval. We believe the stakeholder group can work to optimize between various IC choice options.

1. PJM SHOULD HIRE ENOUGH CONSULTANTS TO CLEAN THE BACKLOG RATHER THAN CREATING A NEW PROCESS AND INTRODUCING A DELAY OF UP TO 2.5 YEARS FOR LATE STAGE PROJECTS. PJM SHOULD ALSO MAKE IT A REQUIREMENT FOR THE TOS TO PROVIDE THE FACILITY STUDIES ON TIME.  
 2. Any project with an SIS should have the flexibility to request for an Interim ISA or ISA ahead of Facility Studies results during the transition while requiring reasonable readiness deposit that is at risk. The interconnection agreements will facilitate progress in areas like engineering, procurement and construction while an optimization of the readiness deposit requirement will thin out the backlog.  
 3. PJM should put more effort toward creating a route for late stage projects (AE1, AE2 & AF1) to move forward expeditiously with an ISA for all PJM options (2, 3 & 4) with the initial costs and network upgrades reflected in their SIS. Significant investment is at risk if late-stage projects must transition to the new process.  
 4. Late stage projects should not be at risk of fully funding the network upgrades if they choose to remain in the serial cost allocation process under PJM Option 4. There should be a path available for late stage projects (AE1, AE2 & AF1) to be reimbursed if funded network upgrades benefit other projects that transition to the new cluster process.  
 5. PJM's Transition Options 2 and 3 do not address late stage projects' interests. Speculative projects are in favor of these options so they can reallocate costs to other "clean" projects and other late-stage projects that are swept into the cluster process.  
 6. Clearing out the PJM backlog is a priority but should not be at the expense of late stage projects that have been investing based on existing rules for years.  
 7. Acciona and affiliated companies would support a PJM Option 4 Serial with the following adjustments:

- Increase RD2 required to Stay in Serial Cost Allocation from 10% to 20% of Allocated NU
- Increase RD3 required to Stay in Serial Cost Allocation from +10% to +20% of Allocated NU
- Provision for projects with an SIS to request for an Interim ISA or ISA ahead of the Facilities Studies results
- One Transitional Serial Group study from AE1-AF2 to speed up the deliverable date of these queues ISAs to Q3 2023

We cannot support any option with a super-cluster (clustering of AE1 - AG1 with no queue priority). If a serial-choice option had smaller transitional clusters that preserved some level of queue priority, we would entertain these options if the transition timeline allowed our late-stage projects to hit ITC/PTC deadlines.

1) We don't think a \$4k/MW readiness payments is high enough 2) We think the readiness payments should be at least \$20k/MW or higher 3) Higher readiness payments will help to clear out the queue. 4) PJM & the TOs should be required to hire more people 5) If PJM is going to hold developers to strict timelines, then the RTO's and TO's should be held to strict timelines too.

PJM Option(#2) reduces the backlog the quickest, should make the study process smoother for TOs/PJM and help LSEs & the States advance their green energy goals

1) Affected System Studies should not hold up the PJM queue process. If an IC has Affected System Studies outstanding when they are at a decision point, they need to manage that risk themselves and not hold up the PJM queue process. 2) Readiness Deposits related to System Upgrades should be partially refundable (say, 50%) if an IC withdraws prior to conclusion of Phase 3 as a result of a major permit being denied.

Whichever transition plan PJM moves forward with, IC Choice is a must have.

We support IC choice, but not the options that sweep all late-stage projects into clusters upon FERC order approval. We believe the stakeholder group can work to optimize between the various IC choice options.

The transition is good to overhaul and clear the back logs but the queues way ahead in SIS, should get both options to choose, the transition cluster (1,2,3 or whatever) can be done in concurrent to reduce the overall transition time. Please include more consultants like us in the team to handle so many requests and transition work. We are dedicated to help developers and PJM wherever we can.

We support IC Choice and not the options that sweep all projects into cluster upon FERC Order.

- Option 4 variants underestimate the amount of time needed to fully develop the tariff provisions necessary to address potential challenges during the transitional serial studies, including but not limited to the below. Such occurrences may not be likely for many projects but will still be possible and need to be addressed in tariff language related to the transitional projects.
  - o Affected system costs, study complications
  - o Unforeseen host system (PJM) cost increases
  - o Readiness deposit treatment – can deposits be held if no harm done to other projects?
- Option 4 and its variants continue the current process that is clearly the main culprit in the current backlog of study projects
- Option 3 presents a relatively simple, straightforward, and timely transition to the new process without the need to develop a full set of unique tariff provisions just for the transitional cluster
- Option 3 maintains some level of queue priority between clusters. Option 4 and its variants as presented would give any project in AG1 the ability to proceed ahead of projects in prior queues and ahead of its regular schedule
- PJM could, in addition to projects that have been tendered an executable ISA, consider grandfathering projects that have all of the following at the time of the effective date. Such projects simply have not had sufficient time for PJM to draft the ISA, but are essentially completed with the study process.
  - o a draft facility study,
  - o affected system studies (if required), and
  - o stability study

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We support IC choice but not the option that sweeps all late stage projects into one cluster. We believe the stakeholder community can work to optimize between various IC choice options.

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All later queued projects that choose the transition serial process and that contribute to the same overload as the first to cause should receive a cost allocation per current cost allocation rules. All projects up to and including AG1 queue should be issued an SIS report prior to making decision on whether to proceed to serial transition or cluster study.

Projects that have made investments starting several years ago that have already entered the queue should be best protected with this transition.

To facilitate the transparency and evaluation of the effectiveness of the interconnection process change, we request that at the monthly Planning Committee meetings, PJM provide updates on the following metrics: 1. Number of projects left in the queue 2. Number of projects PJM has processed 3. Number of projects that have withdrawn from the queue 4. Estimate of number of projects that will remain backlogged by October 2022 5. Number of projects that remain in each study phase We also request that PJM provide an estimate for how these metrics will impact the blackout period for each PJM option.

PJM must allow the ICs the choice to remain within the existing study process & rules.

PJM must allow the ICs the choice to remain within the traditional study process.

PJM must allow the ICs the choice to stay within the existing interconnect study rules

We support IC choice. Late stage projects, with Impact Studies, should not be swept into the transition clusters.

We think it's very important to fine-tune among the "IC choice" options vs. taking any of them as they're currently proposed. We assume this will be part of the stakeholder process and are not anchored to the current version of any of these, though we are clearly 100% opposed to PJM Options 2 and 3 which are unworkable and unfixable.

IC choice!

We support IC choice, not the options that sweep all queues to the cluster regardless of the facts or queue priority.

Several proposals that show the fastest timelines including PJM Option 2 are infeasible due partly to the processing limitation of the TOs. PJM should become more directly involved in facilities studies in order to be able to deliver on schedule vs. relying on the TOs, some of which are not close to being able to deliver on the schedule portrayed in some of the stakeholder proposal presentations (including PJM Option 2)

We'd support increasing pay for PJM staff to assist in recruitment and retention. PJM staffing challenges is a key driver of the backlog and the need for reform so this should really be part of the conversation and there's a substantial willingness to pay among the IC community vs. causing economic harm to late-stage projects

As an IC on a very large solar project with millions invested to date, it's unconscionable that PJM and other stakeholders have advocated for proposals that would change rules to clearly materially harm large projects like ours who have clean SIS in hand and are just waiting to sign their ISAs. We absolutely oppose proposals 2 and 3 or any version of them that would sweep clean projects with SIS in hand into new cost allocation rules with no choice.

Most importantly we believe that Interconnection Customer (IC) choice should be preserved and be able to elect to stay in a serial transition process for projects from through AG1 clusters. It would be unfair and harmful for a number of our projects if we were not granted the choice to preserve queue priority. We believe that PJM #4 Proposal provides the required IC choice and an adequate Readiness Deposit (RD) to help weed out speculative projects, but we would prefer to see a compressed schedule that anticipate more projects withdrawing due to higher RDs and moving to the cluster process.

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Most importantly we believe that Interconnection Customer (IC) choice should be preserved and be able to elect to stay in a serial transition process for projects from through AG1 clusters. It would be unfair and harmful for a number of our projects if we were not granted the choice to preserve queue priority. We believe that PJM #4 Proposal provides the required IC choice and an adequate Readiness Deposit (RD) to help weed out speculative projects, but we would prefer to see a compressed schedule that anticipate more projects withdrawing due to higher RDs and moving to the cluster process.

We support the above options allowing choice, but believe the deposits for such choice must be substantial. Close to the amount suggested by Avangrid.

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We support PJM to offer IC choice through AH1, the queue group that opened prior to substantive PJM transition proposals, during the queue reform transition period. ICs willing to commit financially to NUs (in form of readiness deposits consistent across queue group, regardless of maturity) should be afforded choice to remain in the serial process in a sequence that preserves queue priority. Considering the high financial risk to remaining in the serial transitional process, we estimate relative few ICs will opt to remain (with majority either withdrawing or opting for transitional cluster), which will result in the efficient interconnection of projects in locations not requiring material upgrades, while clearing out the backlog and slotting projects with more complex upgrades into the cluster process for crowdfunding. Coupled with high readiness deposits, this will also result in an overall more efficient, less speculative queue, and encourage projects sited at robust grid connections will allow more efficient clean energy transition with less cost to rate payers. We also support the other transitional proposals that offer IC choice, but we believe they need not be limited to late stage projects.

We support IC choice, but not options that sweep late stage projects into clusters under FERC order approval. We look forward to working with stakeholder group to confirm the best option for all parties.

We support IC choice, and the success of any and all of the options presented here requires sufficient increased PJM staffing. Additionally, to facilitate the transparency and evaluation of the effectiveness of the interconnection process change, we request that at the monthly Planning Committee meetings, PJM provide updates on the following metrics: 1. Number of projects left in the queue 2. Number of projects PJM has processed 3. Number of projects that have withdrawn from the queue 4. Estimate of number of projects that will remain backlogged by October 2022 5. Number of projects that remain in each study phase We also request that PJM provide an estimate for how these metrics will impact the blackout period for each PJM option.

As noted above, we prefer the Geenex proposal as it allows for the most flexibility and IC choice across the AE1 through AH1 queues. We could also support the other options noted above, provided that aspects of each proposal are modified to provide full IC choice. We see IC choice as the most critical factor in evaluating the various options.

A Penalty Free Withdrawal (PFW) mechanism must be included in the final design. A PFW permits an Interconnection Customer (IC) to withdraw from the GI study process, and receive 100% reimbursement of their posted Readiness Deposits, in the event their total GI upgrade cost increases by a fixed amount from the prior study. (Avangrid & Geenex Coalition proposals included PFW). PFW is advantageous to all stakeholders as it allows ICs, especially those “riding the fence”, to easily decide to withdraw earlier in the GI study process. It also mitigates unjust financial exposure an IC may incur due to human error, affected system study surprises, FERC waivers that cause restudies, etc. Without such mechanism, an IC that is convinced they will lose their initial Readiness Deposit, is more likely to double down with another Readiness Deposit in an attempt to obtain a better study result. Such action is highly disruptive to the study process as it usually results in very late-stage withdrawals, additional wasted study analysis by PJM engineers, additional paperwork by PJM Legal if the IC withdraws after ISA execution, and possibly even FERC challenges.

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Option 4 is acceptable if the following changes are implemented: 1. Until the new process is initiated, and the first cluster group is opened for applications, interconnection queue applications received before then should continue to be received, reviewed, and evaluated through the current serial study process to the end, allowing ICs to ultimately sign ISAs. 2. For the backlog of generation projects in AG2, AH1, AH2 and possibly AI1 (queue study groups opened prior to PJM's implementation of the new cluster study process), shorten the process by skipping the feasibility study (for those projects interconnecting at transmission) and proceeding directly to the system impact study, if they have not started for that group. In our view, the feasibility study offers little value to ICs in determining whether their generation project has any significant network upgrades or schedule challenges. PJM, in its application to the FERC, should seek approval to bypass the feasibility study step for those queue groups that have a backlog and remain in the serial study process, thereby reducing the time to completely transition to the cluster study process. 3. While not a modification to the existing serial study queue process, we request that generation projects that have received their system impact study continue to be afforded the opportunity to proceed with interim ISAs at any time, without the risk of those signed interim ISAs subsequently being nullified or retracted because of the new cluster process. Preservation of the interim ISA option for projects that continue in the legacy serial queue process is important to our company in the

optimization of risk and meeting our accelerated delivery of clean energy projects. Without enhancing Option 4 with these recommended changes, there could be a 1 to 2 year period where no ISAs are executed, which is unacceptable and place utilities and states at a high risk of not meeting their goals.

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I can support the options listed above but there needs to be a cost to wanting to stay serial.

Given the magnitude of the backlog, efforts should be made to process as many advanced projects as quickly as possible, up through the target implementation date. After that, the priority must shift to efficiency. Delays are costly and impact all projects (leases, lost ITC/PTC, contract violations) and the cumulative impacts are enormous. PJM Option 3 and E-Cubed proposals seems most realistic and balanced, though Option 3's timeline should be an outer limit.

We cannot support any proposal that requires projects that have spent several years in the interconnection process to effectively start over. Millions of dollars have been invested in these projects and they will face significant harm if they are forced into a new process that will delay their ability to interconnect and open them up to new costs they would not otherwise incur. PJM should obtain sufficient resources to manage the interconnection process and if the fees that interconnection customers are paying are currently insufficient, then those fees should be increased accordingly.

Final package should focus on maximizing efforts to quickly pivot to new model and limit "hiatus" on accepting new queues position while processing existing backlog

We strongly support the options that provide for IC choice. We cannot support the options that do not allow for late stage projects with minimal network upgrades or impacts the choice to continue in the serial queue process as they are unnecessarily penalizing and will have a detrimental impact to bringing on needed generation resources.

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While Geenex is our preference, we are open to Open Road, or PJM option 4, so long as there is an option for AG2 projects to have a serial process. Should other proposals be modified to include this option, we would be open to them.



We would have an equal preference for Geenex, Open Road Renewables, or PJM Option 4, if the AG2 queue had a serial transition option. At present Geenex is the only option we prefer with this option.

We are open to Geenex, Open Road, or PJM option 4, so long as there is an option for AG2 projects to have a serial process. As Geenex is the only proposal outlining this option, we have selected it as our preference. Should other proposals be modified to include this option, we would be open to them.

We Support IC Choice and do not support any option that sweeps all projects into cluster.

1.PJM SHOULD HIRE ENOUGH CONSULTANTS TO CLEAN THE BACKLOG RATHER THAN CREATING A NEW PROCESS AND INTRODUCING A DELAY OF UP TO 2.5 YEARS FOR LATE STAGE PROJECTS. PJM SHOULD ALSO MAKE IT A REQUIREMENT FOR THE TOS TO PROVIDE THE FACILITY STUDIES ON TIME.  
 2.Any project with an SIS should have the flexibility to request for an Interim ISA or ISA ahead of Facility Studies results during the transition while requiring reasonable readiness deposit that is at risk. The interconnection agreements will facilitate progress in areas like engineering, procurement and construction while an optimization of the readiness deposit requirement will thin out the backlog. 3.PJM should put more effort toward creating a route for late stage projects (AE1, AE2 & AF1) to move forward expeditiously with an ISA for all PJM options (2, 3 & 4) with the initial costs and network upgrades reflected in their SIS. Significant investment is at risk if late-stage projects must transition to the new process. 4.Late stage projects should not be at risk of fully funding the network upgrades if they choose to remain in the serial cost allocation process under PJM Option 4. There should be a path available for late stage projects (AE1, AE2 & AF1) to be reimbursed if funded network upgrades benefit other projects that transition to the new cluster process. 5.PJM’s Transition Options 2 and 3 do not address late stage projects’ interests. Speculative projects are in favor of these options so they can reallocate costs to other "clean" projects and other late-stage projects that are swept into the cluster process. 6.Clearing out the PJM backlog is a priority but should not be at the expense of late stage projects that have been investing based on existing rules for years. 7.Acciona and affiliated companies would support a PJM Option 4 Serial with the following adjustments:

Allocated NU	•Increase RD2 required to Stay in Serial Cost Allocation from 10% to 20% of
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ORR and Avengrind's proposals are substantially similar to PJM's Option 4, with minor disconnects to be discussed in the future.

My preference is the option to grandfather projects queue priority and business rules that were in place when projects entered PJM's queue

Any reform to the Interconnection Process must allow for Interconnection Customer choice to move forward based upon the results of studies for advanced projects. We support the further development, and fleshing out of details, for any proposals that allows for IC choice.

We support all proposals that allow for mature, highly queued projects to have the choice to maintain their serial position, lock in their cost allocation and continue to develop their project. While there are many adjustments that will need to be made to allow for the timely processing of serial projects and advancement to the cluster, among other critical goals, the key item coalesce on is the concept of IC choice.

We support IC Choice and do not support any option that automatically sweeps all projects into the cluster process.

1) We don't think a \$4k/MW readiness payments is high enough 2) We think the readiness payments should be at least \$20k/MW or higher 3) Higher readiness payments will help to clear out the queue.

4) PJM & the TOs should be required to hire more people 5) If PJM is going to hold developers to strict timelines, then the RTO's and TO's should be held to strict timelines too.

State jurisdictional projects in states with no well established and reliable interconnection process (such as Pennsylvania) should be treated the same as FERC jurisdictional projects during the transition and under the reformed interconnection rules. It is highly discriminatory to leave these projects with no path to access to the wholesale electricity market, which is the case if there is no state level interconnection process and projects are not allowed access to the PJM queue. Additionally, we support IC choice, but not the options that sweep all late stage projects into clusters upon FERC order approval. We believe the stakeholder group can work to optimize between various IC choice options.

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1) Affected System Studies should not hold up the PJM queue process. If an IC has Affected System Studies outstanding when they are at a decision point, they need to manage that risk themselves and not hold up the PJM queue process. 2) Readiness Deposits related to System Upgrades should be partially refundable (say, 50%) if an IC withdraws prior to conclusion of Phase 3 as a result of a major permit being denied.

Most concerned with getting to later queued projects in AG2 and beyond. Don't believe, however, that FERC will approve something without a means to process late stage queue projects. Therefore, a structure that allows expedient processing of late-stage projects and then quickly pivots to the new cluster process is the best path forward.