

technical screens or analyses and the specific thresholds or criteria that PJM will use as part of the method to identify Contingent Facilities.”⁴ The Clean Energy Entities appreciate PJM’s proposed inclusion of the scope of the System Impact Study from the System Impact Study Agreement at Tariff, Attachment N-1, paragraph 6 into Section 205.2. However, this does not address the Order 845 requirement regarding the “specific thresholds” to be used. PJM proposes that: “[E]ach System Impact Study shall identify the system constraints, identified with specificity by transmission element detail or flowgate in accordance with the distribution factor effect, megawatt contribution, or fault duty contribution, relating to the New Service Requests being evaluated in the study and, as applicable to each....”⁵ This leaves critical issues – such as the *specific* distribution factor, megawatt contribution, or fault duty thresholds to be applied in such evaluations – undefined. Furthermore, while we appreciate the information provided in PJM’s illustrative scenarios, absent specification of the clear thresholds⁶ the Interconnection Customer would remain unable to verify the reason for any violation. These thresholds should either be listed in PJM’s proposed compliance language, or, if provided elsewhere in a manual, the manual section referenced.

B. Surplus Interconnection Service “Material Modification” Thresholds Must be Provided

PJM indicated in the Second Compliance Filing that the Surplus Interconnection Study will consist of “reactive power, short circuit/fault duty and stability analyses and any other appropriate analyses,” as well as “off-peak steady-state analyses [to] be performed to the required level necessary to demonstrate reliable operation of the Surplus Interconnection Service requested.”⁷ However, PJM does not identify the metrics which will be used in such evaluations.

⁴ See *PJM Interconnection LLC*, 169 FERC ¶ 61,226 at P43 (“December 2019 Order”).

⁵ Second Compliance Filing at 5.

⁶ For example, “loading at 105% (or higher) of rated capacity and distribution factor greater than 5%”

⁷ Second Compliance filing at 12.

PJM's filing does not clarify whether the thresholds would be consistent with those from New Interconnection Requests, or instead conducted to solely determine that there is no degradation of the bulk electric system. Additionally, the Second Compliance Filing does not indicate what study model will PJM use in such determinations. Financial elements are similarly unclear; for instance, if a Surplus Interconnection Study indicates that one or more material modifications are present, and the request is accordingly withdrawn, PJM's Second Compliance Filing does not appear to specify whether the Surplus Interconnection Customer will be refunded the unused portion of the \$10,000 (plus \$100/MW) deposit.

Finally, the Clean Energy Entities have concerns regarding PJM's proposed completion of the Surplus Interconnection Study in 180 days, while other ISO/RTOs have proposed shorter study periods.⁸ PJM has not sufficiently justified such a significantly longer period of time. Without sufficient justification, PJM's request for such a lengthy study timing should be shorted to be more in alignment with other ISO/RTOs.

C. Timing for Implementation of Surplus Interconnection Service Should Not be Delayed

PJM has requested 180 days for implementation of Surplus Interconnection Service and 60 days for the other provisions. However, the interest in such a service by Interconnection Customers and Generation Owners dates back to the beginning of the early filings that initiated Order No. 845 in more than five years ago. PJM does not proffer sufficient justification for such a delay, and the Clean Energy Entities request that the Commission deny this request and require 60-day implementation. In consideration of the delay caused in compliance efforts, PJM has essentially already received an extension of time for planning the implementation of this service.

⁸ See e.g. *Midcontinent Indep. Sys. Operator, Inc.*, 169 FERC ¶ 61,221 at PP120, 128-130 (2019).

II. CONCLUSION

WHEREFORE, the Clean Energy Entities respectfully submit these comments for the Commission's consideration and urges the Commission to require the following clarifications and revisions to PJM's proposal:

- i. PJM should provide specific thresholds for determining contingent facilities, as envisioned in Order 845;
- ii. PJM should provide thresholds, guidelines or metrics that will be used in assessments of Surplus Interconnection Studies;
- iii. PJM should provide clarification on unused portions of deposits provided for Surplus Interconnection Studies;
- iv. PJM should provide sufficient justification of the need for a six-month study period for Surplus Interconnection Studies, or shorten it;
- v. PJM should provide clarification on the base study models used for Surplus Interconnection Service Studies; and
- vi. PJM should be given 60 days to implement Surplus Interconnection Service, rather than the 180 days.

Respectfully submitted,

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Document Content(s)

2020-03-13 - AWEA-SEIA PJM response FINAL.PDF.....1-5