

# COALITION STAKEHOLDER PACKAGE

## **PJM IPRTF Solution**

October 7, 2021

## **Executive Summary**

Transitional Serial (TC) & Transitional Cluster (TC) was developed to:

- Provide "transitional equity":
  - Allow Interconnection Customers (ICs) the opportunity to choose between serial network funding or cluster network funding.
  - ICs with no network upgrades or for those pre-SIS projects acceptable anticipated standalone NUs per current serial study methodology won't be forced into a cluster where they may have to fund network upgrades caused by later queued projects.
- Enrollment in TC & TS is closed to non-members of those original queue groups and each project has only one choice.



# **Transitional Serial (TS)**

- Transitional Serial is built on the rules of the current process (Traditional Serial) with certain new "readiness" requirements that are like those in the Cluster Process.
  - Study Deposit
  - Readiness Deposits
  - Site Control Requirements
  - Affected System performance at decision points (if applicable)
- Feasibility Study phase is eliminated
- Suspension of milestone dates limited to one year.
- The above at-risk deposit structure, site control requirements, and reduced study phase, will likely cause immature projects to withdraw or projects in congested area to opt for Transitional Cluster (TC) process.

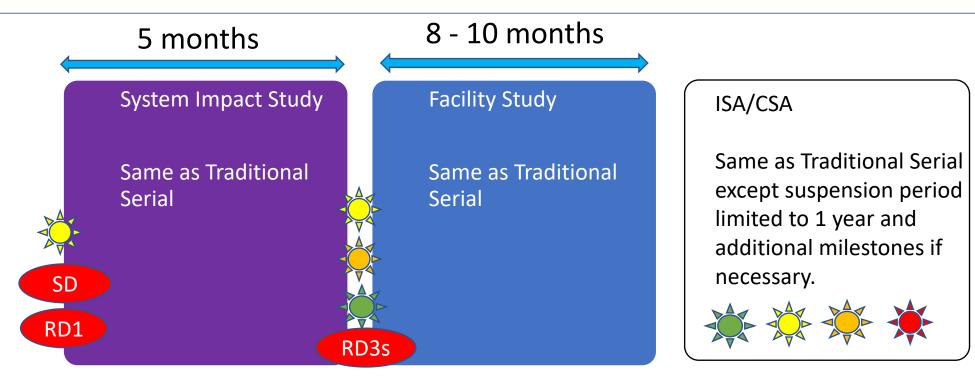


## **Transitional Serial (TS)**

- Transitional Serial cycles are completed prior to the Transitional Cluster cycle for the same queue group or set of queue groups.
- Transitional Serial is completed prior to start of Phase 3 of subsequent Transitional Cluster
- AE1 AG1 Transitional Serial
  - Readiness Deposit is \$4000/MW
  - Study Deposit
  - Site Control prior to Facility Study/Phase 3 is required
  - Air/Water/Fuel
- AG2 + After Transitional Serial
  - Readiness Deposit is \$4000/MW
  - Study Deposit
  - Application Generation Facility Site Control is required
  - Update Queue Point to one POI
- Similar to cluster process, PJM Transitional Serial (TS) model will be available 45 days prior to decision to enter Transitional Serial
- Allow downsizing according to the current PJM rule before entering TS.



# **Transitional Serial (TS)**











Evidence of Affected System Performance



Site Control



Air, water, fuel permits



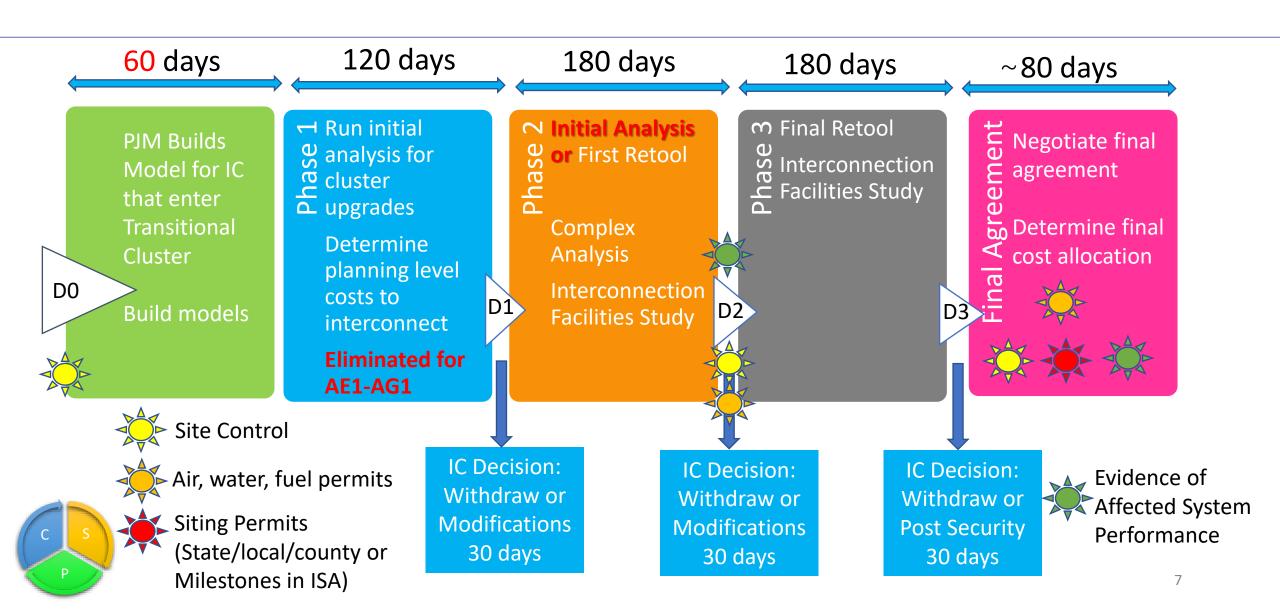
Siting Permits
(State/local/county/fuel or Milestones in ISA)

# **Transitional Cluster (TC)**

- Transitional Cluster is built on the rules of the proposed Cluster Process.
- Decision Point 0 (D0) Enter Transitional Cluster
  - Readiness Deposit is \$4000/MW
  - Study Deposit
  - Application Generation Facility Site Control
- AE1 AG1 Transitional Cluster
  - Phase 1 is eliminated
- AG2 AH1 Transitional Cluster
  - Update Queue Point to one POI

PJM Builds Model and provides to ICs for a 30-day due diligence period

## **Transitional Cluster (TC) Process**



# Study Deposits – Transitional Serial & Transitional Cluster Process

- Study Deposit (SD)
  - Covers the study costs
  - Refundable less actual study costs

<b>Project Size</b>	Deposit			
0 – 20 MW	\$75,000			
> 20 – 50 MW	\$200,000		Previously	
> 50 - 100 MW	\$250,000	Funded Traditional Study Deposits	Study Deposit	
> 100 – 250 MW	\$300,000		,	
> 250 – 750 MW	\$350,000			
> 750 MW	\$400,000			



# Readiness Deposits – Transitional Serial & Transitional Cluster

- Readiness Deposit (RD)
  - Funds committed based upon study results
  - Not used to fund studies
  - Refunds subject to study phase and adverse test results
  - RDs determined at the time they are due; not to be funded or reduced or reduced based upon later project reductions or cost allocations.
  - Allocated Upgrades = Allocated Network Upgrades (NU)

Transitional Serial Process			
Phase	Readiness Deposit		
System Impact	RD1 =\$4000/MW		
Facility	RD3s = 20% of Upgrades – RD1*		
* Upgrade – The Total Upgrade cost for the constraints that were caused or			

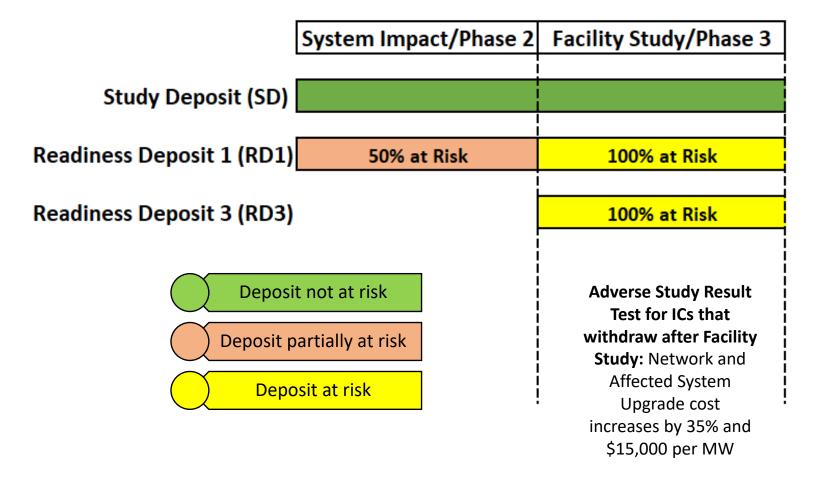
<sup>\*</sup> Upgrade – The Total Upgrade cost for the constraints that were caused or aggravated by the study projects.

Transitional Cluster Process			
Phase	Readiness Deposit		
Application	RD1 = \$4000/MW		
Phase 2	RD2 = 10% of Allocated Upgrades – RD1**		
Phase 3	RD3 = 20% of Allocated Upgrades – RD2 – RD1 **		



<sup>\*\*</sup> Allocated Upgrade – The total upgrade cost allocation to the cluster projects for the constraints that were caused or aggravated by the study projects.

## Transitional Serial – Study and Readiness Deposits at Risk





## **Comparison of Readiness Deposits – Sample A**

• In the traditional serial process, a 150 MW project in a non-congested area triggered an overload that requires a \$30 million upgrade. Two subsequent projects also contributed to the same upgrade. Each of the three projects contributed the same DFAX to the transmission facility.

	<b>Traditional Serial</b>	Transitional Serial	Transitional Cluster
Initial Study Deposit1	\$25,000 (Month 1-4)	\$300,000	\$300,000
	Shu dud dvionth hi	Sample A Project is better off choosing	
System Impact Study1	4== 000	Transitional Cluster	<b>+</b>
Facility Study1	\$100,000	Process	
Readiness Deposit 1 (RD1)	\$0	\$600,000	\$600,000
Readiness Deposit 2 (RD2)	\$0	NA	\$1,000,000
Readiness Deposit 3 (RD3) or (RD3s)	\$0	\$6,000,000	\$2,000,000
Total	\$200,000 - \$235,000	\$6,900,000	\$3,900,000



# **Would Many Projects Choose Transitional Serial?**

- NO! Much higher at-risk readiness deposits prevent projects from entering Transitional Serial to take chances.
- Readiness deposit is much higher for projects at congested (crowded) regions in the Transitional Serial Process than in the Transitional Cluster Process.
- First-to-cause interconnection customer provides <u>100% of security for entire</u> <u>Network Upgrade</u> when ISA is executed. There is no guarantee subsequent interconnection customers would move forward and provide partial reimbursement.
- When one subsequent project signs ISA, <u>100% of the security is at risk.</u>
- Increasing Network Upgrade costs accelerate pushing projects in RED ZONE where they would be uncompetitive in the PJM market.
- Consequence of withdrawing is financial loss RD1 deposit and substantial time if project is pushed to next open cluster cycle.



## **Comparison of Initial Deposits**

Sample Project: 150 MW, \$10,000,000 of Allocated Network Upgrades

	Traditional Serial	Transitional Serial	Transitional Cluster
Initial Study Deposit <sup>1</sup>	\$25,000 (Month 1-4) \$42,500 (Month 5) \$60,000 (Month 6)	\$300,000	\$300,000
System Impact Study <sup>1</sup>	\$75,000		
Facility Study <sup>1</sup>	\$100,000		
Readiness Deposit (RD1) <sup>2</sup>	\$0	\$600,000	\$600,000
Total	\$200,000 - \$235,000	\$900,000	\$900,000

<sup>&</sup>lt;sup>1</sup>Unused study deposits are returned.

<sup>&</sup>lt;sup>2</sup>50% of funds at risk.



#### **HUGE INCREASE FROM TRADITIONAL!!**

380% to 450% increase!!!

### **Comparison of Readiness Deposits**

Sample Project: 150 MW, \$10,000,000 of Allocated Network Upgrades. Network Upgrade is \$30,000,000.

	Traditional	Transitional Serial	Transitional Cluster
Readiness Deposit 2 (RD2) <sup>1</sup>	\$0	NA	\$1,000,000
Readiness Deposit 3 (RD3) <sup>2</sup>	\$0	NA	\$2,000,000
Readiness Deposit 3s (RD3s) <sup>3</sup>	\$0	\$6,000,000	NA

<sup>&</sup>lt;sup>1</sup>Adverse Test – Allocated Network Upgrade Cost and Allocated Affected System Upgrade Costs increase exceeds 25% and \$10,000/MW Increase.

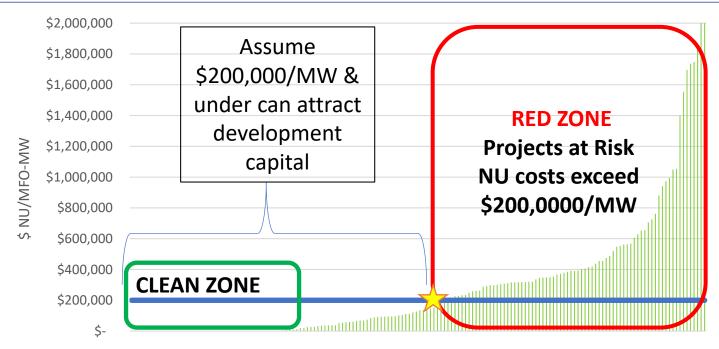


# Going from no Readiness Deposits up to \$2- \$6 million. HUGE NEW FEES!!

<sup>&</sup>lt;sup>2</sup>Adverse Test – Allocated Network Upgrade Cost and Allocated Affected System Upgrade Costs increase exceeds 35% and \$15,000/MW Increase.

<sup>&</sup>lt;sup>3</sup>Adverse Test – Network Upgrade Cost and Allocated Affected System Upgrade Costs increase exceeds 35% and \$15,000/MW Increase.

### Cost of Allocated Network Upgrades in DOM for projects with SIS



#### Sample Project \*

Size: 150 MW

Interconnection Costs: \$9,000,000

Allocated Network Upgrades: \$30,000,000

Network Upgrade: \$60,000,000

RD1 = \$600,000; \$300,000 at risk

RD2 = \$3,000,000; \$3,000,000 at risk

RD3s = \$12,000,000 = (.2)\*(\$60,000,000);

\$12,000,000 at risk



	Number of Projects	Estimate of choices ICs will make
CS	43 (26%) in Clean Zone	Most likely to get through Traditional Process
	48 (30%) in middle	Most likely to choose Transitional Serial
	74 (44%) in Red Zone	Most likely to choose Transitional Cluster or Withdraw

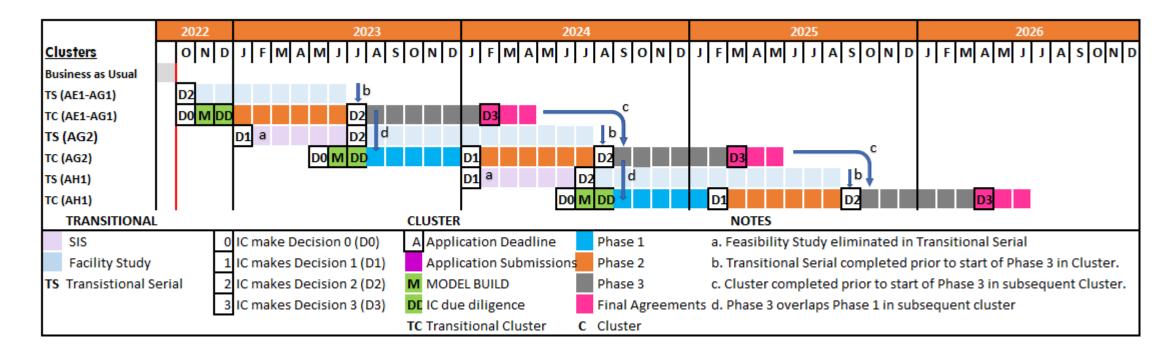


### **Transitional Serial & Transitional Cluster**

- 1. All ICs in the AD2 cluster or before remain in the Traditional Serial process.
- 2. All ICs in the AE1 AH1 queue can <u>only</u> choose 1) Transitional Serial or 2) Transitional Cluster Process.
- 3. ICs that don't meet the new deposit and site control requirements are withdrawn.



#### **Transition Schedule**



Study Deposits and Readiness Deposits are due at end of the Decision Points.



## **Queue Priority**

- Prior to FERC Approval Business as Usual
- 1. AD2 & Before
- 2. Projects from AE2 AG1
- After FERC Approval
  - 1. AE1 AG1 in Transitional Serial
  - 2. AE1 AG1 in Transitional Cluster
  - 3. AG2 in Transitional Serial
  - 4. AG2 in Transitional Cluster
  - 5. AH1 in Transitional Serial
  - 6. AH1 in Transitional Cluster



# **Transitional Deposits**

Cluster	D0	<b>D1</b>	D2
TS (AE1-AG1)			SD + RD1
TC (AE1-AG1)	SD + RD1		RD3
TS (AG2)		SD + RD1	RD3s
TC (AG2)	SD + RD1	RD2	RD3
TS (AH1)		SD + RD1	RD3s
TC (AH1)	SD + RD1	RD2	RD3



#### **Other Terms – For Serial and Cluster**

- ☐One year Suspension Period
  - Transitional Serial, Transitional Cluster, Cluster
- ☐ Inter-Cluster Funding Network Upgrades 5 Year
  - Transitional Serial \$5 M or more (no change)
  - Transitional Cluster, Cluster \$25 M or more
- ☐Site Control
  - Move DP1 requirements to DP2



#### **Contact Information**

Lesley Williams

Senior Vice President

**Geenex Solar LLC** 

Lesley.Williams@geenexsolar.com

Donna Robichaud

Senior Vice President

Geenex Solar LLC

Donna.Robichaud@geenexsolar.com

**Georg Veit** 

**CEO** 

**Geenex Solar LLC** 

Georg.Veit@geenexsolar.com

Ken Foladare

Director, RTO and Regulatory Affairs

Tangibl Group, Inc.

Ken.Foladare@tangiblinc.com



CONFIDENTIAL 21

#### **Contact Information**

Jay Carlis
Executive Vice President
Community Energy Solar
Jay.Carlis@CommunityEnergyInc.com

Walter Crenshaw
Development Director
Community Energy Solar
Walter.Crenshaw@CommunityEnergyInc.com



CONFIDENTIAL 22

## **Clearway Energy Contact Information**

- Ling Hua
- Senior Manager Grid Integration
- Ling.hua@clearwayenergy.com

- Chris Barker
- Senior Director Transmission and Grid Integration
- Chris.Barker@clearwayenergy.com

#### CC:

John Woody, Head of Development, john.woody@clearwayenergy.com

Hannah Muller, Head of Market and Policy, <a href="mailto:Hannah.muller@clearwayenergy.com">Hannah.muller@clearwayenergy.com</a>

Nick Benjamin, Director of Development, <a href="mailto:nick.benjamin@clearwayenergy.com">nick.benjamin@clearwayenergy.com</a>

Dan Keyes, Senior Manager Business Development <a href="mailto:dan.keyes@clearwayenergy.com">dan.keyes@clearwayenergy.com</a>

