

***Generation Interconnection
System Impact Study Report***

For

***PJM Generation Interconnection Request
Queue Position W3-003***

East Flemington-Frenchtown 34.5kV

June 2011

Preface

The intent of the System Impact Study is to determine a plan, with approximate cost and construction time estimates, to connect the subject generation interconnection project to the PJM network at a location specified by the Interconnection Customer. As a requirement for interconnection, the Interconnection Customer may be responsible for the cost of constructing: Network Upgrades, which are facility additions, or upgrades to existing facilities, that are needed to maintain the reliability of the PJM system. All facilities required for interconnection of a generation interconnection project must be designed to meet the technical specifications (on PJM web site) for the appropriate transmission owner.

In some instances an Interconnection Customer may not be responsible for 100% of the identified network upgrade cost because other transmission network uses, e.g. another generation interconnection or merchant transmission upgrade, may also contribute to the need for the same network reinforcement. The possibility of sharing the reinforcement costs with other projects may be identified in the Feasibility Study, but the actual allocation will be deferred until the System Impact Study is performed.

The System Impact Study estimates do not include the feasibility, cost, or time required to obtain property rights and permits for construction of the required facilities. The project developer is responsible for the right of way, real estate, and construction permit issues. For properties currently owned by Transmission Owners, the costs may be included in the study.

General

Quakertown Farms, LLC, the Interconnection Customer (IC), has proposed a solar generating facility located in Franklin Township, New Jersey (Attachment 1). The installed facilities will have a total capability of 10.0 MW with 0.0 MW of this output being recognized by PJM as capacity. This means that the full 10.0 MW will be curtailable should a system reliability constraint occur. The proposed in-service date for this project is June 1, 2012. **This study does not imply a First Energy commitment to this in-service date.**

Attachment facilities and local upgrades (if required) along with terms and conditions to interconnect W3-003 will be specified in a separate two party Interconnection Agreement (IA) between First Energy and the Interconnection Customer as this project is considered FERC non-jurisdictional per the PJM Open Access Transmission Tariff (OATT). From the transmission system perspective, no network impacts were identified as detailed below.

Point of Interconnection

W3-003 will interconnect with the Jersey Central Power & Light system at the 34.5kV line A729 between the East Flemington and Frenchtown substations.

First Energy Analysis and Results

As defined by the Quakertown Farms LLC and shown on Attachment 2, the connection for the W3-003 Project will be from a tap of the West Flemington Tap - Baptistown section of the East Flemington - Eaton - West Flemington - West Flemington Tap - Baptistown - Frenchtown (A729) 34.5 kV line at or near pole NJ184DTA729 on the north side of State Highway 12, 3.1 miles east of the Baptistown 34.5 kV substation where it crosses Croton Road. From this pole Jersey Central will construct a new 34.5 kV line extension that will be overbuilt on an existing 4.8 kV Distribution circuit right-of-way that follows Croton Road north for about 1.14 miles to a point at or near pole NJ450FT adjacent to the W3-003 Project site. Jersey Central will then extend a one span radial line extension (about 200 feet) to a pole structure to be constructed, owned, operated and maintained by the Interconnection Customer. The Interconnection Customer will be responsible for the attachment line from this pole to the W3-003 Project collector substation. Since Jersey Central will not own, operate and maintain this extension, the contractual point of interconnection will be from the new Jersey Central pole NJ450FT near the W3-003 Project site as identified on Attachments 2 and 3.

In summary, Attachment 3 shows a conceptual one-line diagram of the Direct Connection facilities that will be required for the W3-003 Project. As indicated, it will be studied as a 10 MW injection to the Jersey Central 34.5 kV system at pole NJ184DTA729 of the West Flemington Tap - Baptistown (A729-3) 34.5 kV line. Disconnect switches will be needed on poles NJ183DTA729 and NJ185DTA729 as well as the radial tap pole in addition to a circuit breaker and switch on the system side of the generator step-up transformer. The Interconnection Customer will be responsible for acquiring all permits and right of way that may be required for the 34.5 kV line tap and the radial line extension. The Interconnection Customer will also be responsible for all permits and constructing, owning and operating all facilities on its side of the point of interconnection including the attachment line that crosses Croton Road. A summary of the FE facilities required for the W3-003 Project Direct Connection and their cost estimate is shown on Attachment 4.

Power Flow Analysis

A Power Flow study was conducted to determine the reliability impact of the proposed W3-003 Project on the FE Transmission System. This study was completed using a 2013 summer peak and light load power flow that contain a detailed representation of the Jersey Central transmission networks in the area of the proposed W3-003 Project. Note that the year 2013 was chosen for study rather than 2015 since this is the first summer period when the W Queue solar projects are scheduled for service. The findings and the recommendations from this analysis are based on a contingency review that was performed to identify the facility loadings and/or voltage conditions that violate the Reliability *First*, PJM or FE Planning Criteria and are attributable to this project.

The results of the FE analysis show that there are no network upgrades required for the W3-003 Project since it is an energy only facility and therefore 100% curtailable for normal operation and single contingency constraints. In short, it will have no capacity for deliverability to the Jersey Central and PJM transmission systems. There also are no common mode outage reinforcements defined for previous projects for which it will have an impact. However, the W3-003 Project will be one of thirteen proposed generator attachments to the East Flemington - West

Flemington - West Flemington Tap - Baptistown - Frenchtown (A729) 34.5 kV path to date with a total capability of 100.5 MW while the continuous rating of the limiting section of this circuit is only 35 MVA. Specifically as shown on Attachment 5, the FE study results show that the flow on the West Flemington - West Flemington Tap (A729-3) 34.5 kV line section can reach 236.5% of its normal rating for peak load conditions with all of the proposed projects dispatched at their full energy output. For a line end contingency the flow can reach 201.8% of its emergency rating. The study results further show that higher overloads can be expected for off peak conditions. In addition, there is the potential for high voltage during light load periods and voltage criteria violations due to swings in the MW output of the cumulative attached solar generation. A conclusion of this analysis is therefore that a partial to full curtailment of the W3-003 Project output can be expected at most times since it has no capacity injection rights in order to maintain the Jersey Central system reliability within the NERC, Regional and FE operations and planning standards if all proposed Interconnection Projects proceed. If desired, the Interconnection Customer can fund a Jersey Central project to reconductor the limiting facilities to eliminate these constraints.

Note that a further conclusion of this study is that it will be mandatory for the W3-003 Project to have a range of dynamic reactive capability that supports its operation from a .95 lead to .90 lag power factor. Without a continuous regulation, the FE studies show that the addition of solar projects can cause voltage swings as their output oscillates with moving clouds and system voltages that can exceed the established limits. Should the Interconnection Customer fail to provide a dynamic reactive capability from the W3-003 Project for any reason once interconnected, the Jersey Central and/or PJM Dispatchers may need to take action to curtail both the energy and capacity portion of its output to prevent a non-compliance with voltage criteria.

Short Circuit and Dynamics Analysis

In accordance with the Interconnection process, a short circuit analysis will not be conducted by PJM since the Quaker Farms (W3-003) Project connection is to the 34.5 kV system. Therefore, the FE Protection staff conducted a short circuit review of the project connection. An assumption of this study was that solar generation projects will contribute no appreciable fault current to the breakers on the FE transmission system. As defined by EPRI: "Inverters are generally designed to limit fault currents to 130% or less of rated current. Thus they can usually be disregarded when conducting fault studies."¹ Based on this fact, the results of the FE analysis showed that no FE circuit breaker will exceed its interrupting capability with the implementation of the W3-003 Project. Therefore no circuit breaker reinforcements will be required.

System Protection Analysis

An analysis was conducted to assess the impact of the W3-003 Project on the system protection requirements in the area. The results of this review have identified the following:

Under the assumption that the W3-003 Project generation will not supply fault current to the Jersey Central transmission system, there will be no protection upgrades needed for the East Flemington - Frenchtown (A729) 34.5 kV path. However, the W3-003 Project will be required

¹ EPRI Document TR-111490 "Integration of Distributed Resources in Electric Utility Distribution Systems: Distribution System Behavior Analysis for Suburban Feeder", published November 1998, page 62

to have two independent high-speed zones of protection to sense and clear faults on the interconnection transformer.

Fault current on the West Flemington Tap - Baptistown (A729) 34.5 kV line section 3.1 miles from Baptistown substation (toward West Flemington Tap) are listed below.

Three Phase:	3,203 amperes
Line to Ground:	1,720 amperes

Thevenin Impedances in ohms:

Positive Sequence:	1.962 + j 5.901
Zero Sequence:	4.320 +j 21.911

These values are for the current system configuration. Any system changes in the area could have a significant impact on these values. It will be an Interconnection Customer responsibility to make any protection upgrades required should this occur.

Due to the low magnitude of maximum fault current expected for the 10 MW connection, either a fuse can be added on the line or fault indicators installed off of the tap. The choice will be determined during the final engineering. A cost estimate of the FE system protection facilities required for the W3-003 is included on Attachment 4.

Metering

The Interconnection Customer will be required to comply with all FE Revenue Metering Requirements for Generation Interconnection Customers. These FE requirements are detailed on Attachment 6 to this report.

Compliance Issues

The proposed interconnection facilities must be designed in accordance with the FirstEnergy “Requirements for Transmission Connected Facilities” located at:

<http://www.pjm.com/planning/design-engineering/to-tech-standards.aspx>

This includes the provision of a reactive power capability sufficient to maintain a composite power delivery for the facility at the interconnection point at a power factor between .95 leading (absorbing 3.29 MVAR) and .90 lagging (producing 4.84 MVAR). If this capability cannot be provided by the solar units, a dynamic device such as a STATCOM or SVC must be installed at the W3-003 Project substation at the Interconnection Customer’s cost.

The Interconnection Customer will be responsible for following the requirements of the “FirstEnergy Wholesale Generation Interconnection (WGI) Manual” and the “FE Approved Vendors and Contractors” documents which are also located at the above link. In addition, Quakertown Farms LLC will be required to meet all PJM, Reliability *First* and NERC reliability criteria and operating procedures for standards compliance. For example, the Developer will need to properly locate and report the over and under-voltage and over and under-frequency

system protection elements for its units as well as the submission of the generator model and protection data required to satisfy the PJM and Reliability*First* audits. Failure to comply with these requirements may result in a disconnection of service if the violation is found to compromise the reliability of the FE system.

FE Facility Upgrades and Costs

The results of the FE analysis shows that no planning criteria violations are attributable to the addition of the W3-003 Project for the conditions studied. Therefore the conclusion is that no transmission or distribution reinforcements will be required to provide the requested service.

Network Impacts

The Queue Project #W3-003 was studied as a(n) 10.0MW(Capacity0.0MW) injection at BAPTISTN 34.5kV substation in the JCPL area. Project #W3-003 was evaluated for compliance with reliability criteria for summer peak conditions in 2015. Potential network impacts were as follows:

Generator Deliverability

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

None

Multiple Facility Contingency

(Double Circuit Tower Line, Line with Failed Breaker and Bus Fault contingencies for the full energy output)

None

Short Circuit

(Summary form of Cost allocation for breakers will be inserted here if any)

Not required

Contribution to Previously Identified Overloads

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

None

Steady-State Voltage Requirements

(Results of the steady-state voltage studies should be inserted here)

None

Stability and Reactive Power Requirement

(Results of the dynamic studies should be inserted here)

None

New System Reinforcements

(Upgrades required to mitigate reliability criteria violations, i.e. Network Impacts, initially caused by the addition of this project generation)

None

Contribution to Previously Identified System Reinforcements

(Overloads initially caused by prior Queue positions with additional contribution to overloading by this project. This project may have a % allocation cost responsibility which will be calculated and reported for the Impact Study)

(Summary form of Cost allocation for transmission lines and transformers will be inserted here if any)

None

Delivery of Energy Portion of Interconnection Request

PJM also studied the delivery of the energy portion of this interconnection request. Any problems identified below are likely to result in operational restrictions to the project under study. The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request.

Only the most severely overloaded conditions are listed. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection Request, a subsequent analysis will be performed, which will study all overload conditions associated with the overloaded element(s) identified.

None

Interconnection Customer Requirements

In addition to the FE facilities, the Interconnection Customer will also be responsible for meeting all criteria as specified in the applicable sections of the "FE Requirements for Transmission Connected Facilities" document. Since the W3-003 Project will be connected to the 34.5 kV network, the Interconnection Customer will also be responsible for compliance with the FirstEnergy "Technical Requirements for the Interconnection of Parallel-Operated Generation to the FirstEnergy Distribution System". This includes but is not limited to the following:

1. The purchase and installation of the minimum required FE generation interconnection relaying and control facilities. This includes over/under voltage protection, over/under frequency protection, and zero sequence voltage protection relays.
2. The purchase and installation of the standard voice grade (analog) telephone line and associated conduit between the telephone company source and the meter socket or enclosure.
3. A compliance with the FE and PJM generator power factor and voltage control requirements. Note that the W3-003 Project will need to absorb reactive power at the point of interconnection to minimize the voltage change should the units rapidly reduce their output or trip off line.
4. The execution of a back-up service agreement to serve the customer load supplied from the Quaker Farms 34.5 kV substation when the units are out-of-service. This assumes the intent of the Interconnection Customer is to net the generation with the station load.
5. Any complaints from other customers (e.g. flicker complaints) will have to be corrected by the Interconnection Customer. Correction may include changing operation, reducing generation, disconnecting the generators from the Jersey Central system, or other measures.
6. The purchase and installation of supervisory control and data acquisition (SCADA) equipment to provide information in a compatible format to the FE Transmission System Control Center. The RTU, the communications channel and all related equipment will be furnished and maintained by the Interconnection Customer. The RTU must communicate with the FirstEnergy EMS via DNP 3.0 protocol.
7. The following status, control and metering points will be required:
 - a. Interconnection breaker position status and trip control.
 - b. Generator real and reactive power output measured at the high-side of the generator step-up transformer.
 - c. Generator voltage at the point of interconnection.
8. An installation of two independent high-speed zones of protection to sense and clear faults on the interconnection transformer.
9. A compliance with the inverter standard UL1741 and IEEE 1547, "Standard for Interconnecting Distributed resources with Electrical Power Systems", in addition to the power quality standards defined by ReliabilityFirst and PJM.

10. A provision of the necessary generator protection, synchronization controls, and fault detection to initiate a trip to protect the W3-003 Project equipment from faults on the Jersey Central System.
11. A compliance with the PJM Manuals and Operating instructions to have a plant operator on call 24/7 to respond within a minute to reduce the output of W3-003 Project when network constraints occur.

The above requirements are in addition to any metering or other requirements imposed by PJM.

Note that an assumption of this study is that the W3-003 Project generation will automatically be disconnected whenever the local area network is islanded. If this assumption is not correct, a direct transfer trip scheme will need to be implemented for such situations at the Interconnection Customer's cost.

Summary

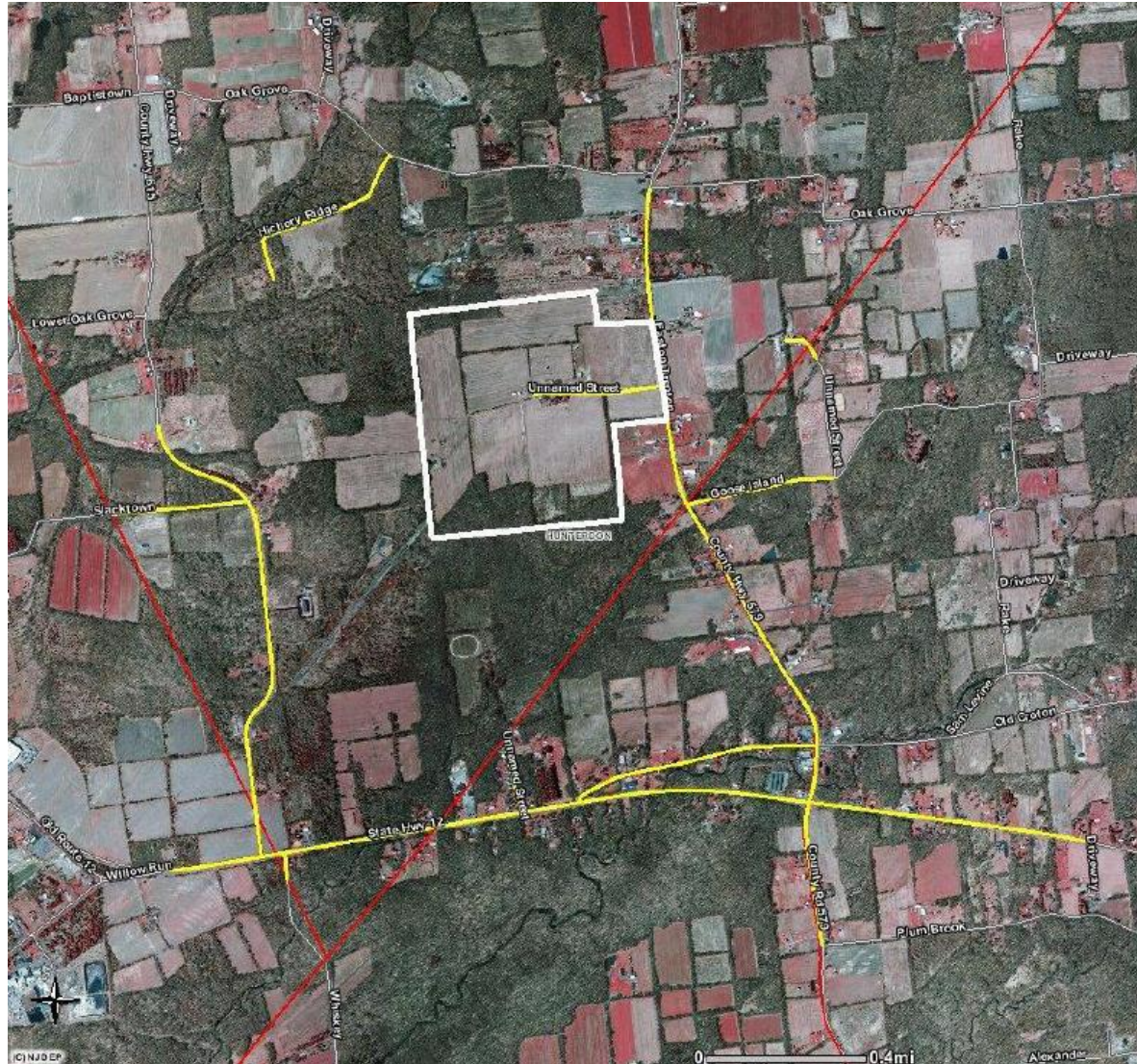
The connection of the W3-003 Project to the FE transmission system will require no network upgrades. Therefore the Interconnection Customer will only have a cost responsibility for the Direct Connection of the W3-003 Project to the Jersey Central transmission system. As shown on Attachment 4, the estimated cost of these facilities is \$1,606,000. Note that this estimate excludes any transmission service charges that may be applicable for the dedicated use of the radial over built 34.5 kV facilities by the W3-003 Project.

Based on the extent of the FE direct connection and system upgrades required to support this project, it is estimated that it will take one (1) year from the date of a fully executed Interconnection Construction Service Agreement to complete the upgrades required for the W3-003 Project. Full payment of the estimated cost of the project will be required upon execution of the Interconnection Service Agreement/Interconnection Construction Service Agreement (ISA/CSA). True up of the actual cost versus estimated cost of the project will be performed by FE at the end of the project. As a requirement, the Interconnection Customer must provide the property for the attachment and right-of-way facilities that will be needed at the project initiation. It is also assumed that there will be no environmental issues with any of the new properties associated with this project, that there will be no delays in acquiring the necessary permits for implementing the defined direct connection and network upgrades, and that all 34.5 kV transmission system outages can be scheduled when needed.

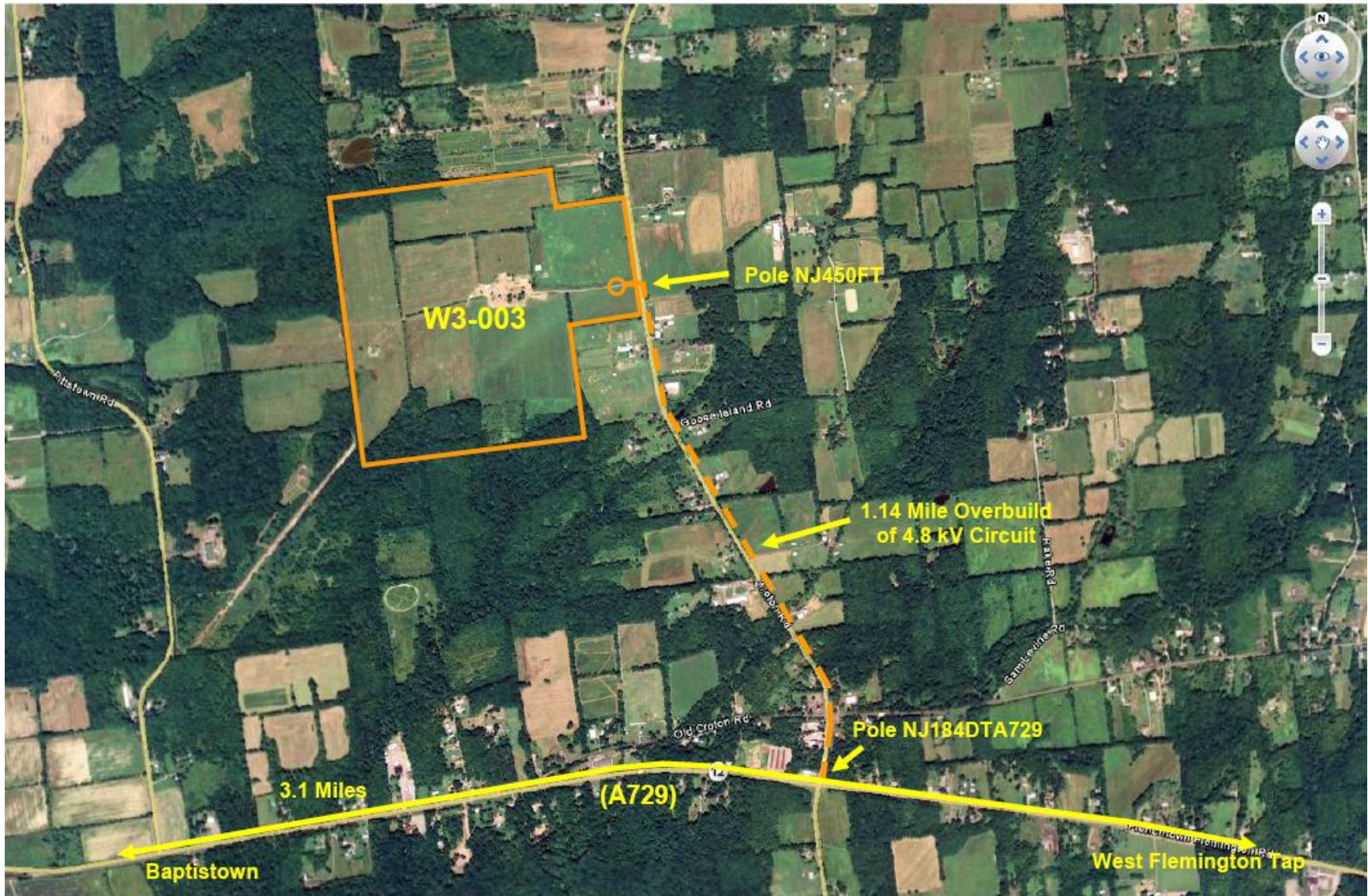
Note that the FE findings were made from a conceptual review of this project. A more detailed review of the connection facilities and their cost will be identified in the System Facilities Study. Further note that the cost estimate data contained in this document should be considered as only ballpark since it was produced without a detailed engineering review. The applicant will be responsible for the actual cost of construction. FE herein reserves the right to return to any issues in this document and, upon appropriate justification, request additional monies to complete any connections to the transmission system.

Attachment 1

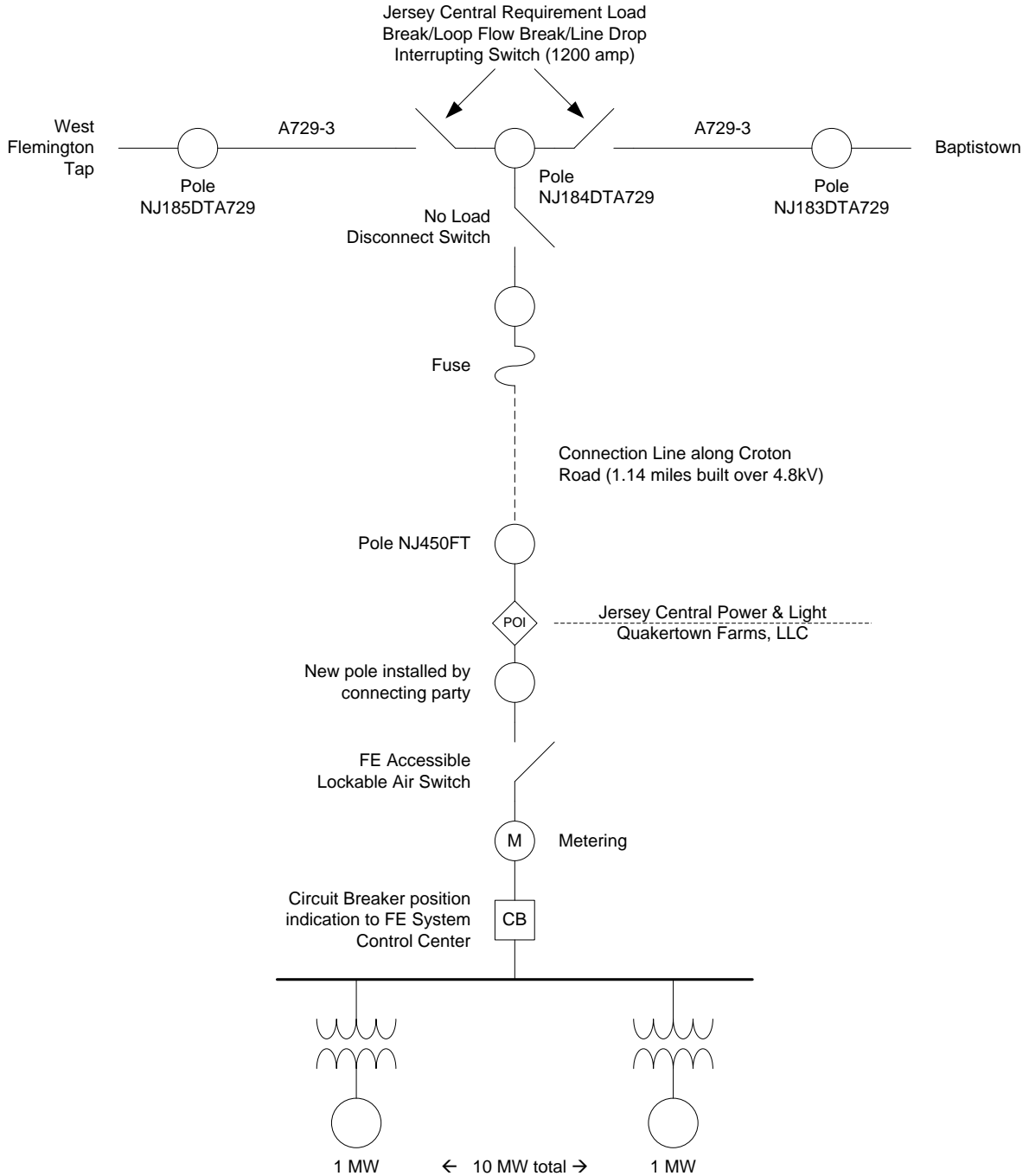
Site View



Attachment 2
Aerial View



Attachment 3 Single Line Diagram



Attachment 4
Estimated Costs

Item	Connection Facilities
1	Construct a new pole NJ184DTA729 on the West Flemington - Baptistown section of the East Flemington - Eaton - West Flemington - West Flemington Tap - Baptistown - Frenchtown (A729) 34.5 kV path about 3.1 miles east from the Baptistown substation in a three way dead end tap configuration.
2	Rebuild poles NJ183DTA729 and NJ185DTA729 on the West Flemington - Baptistown (A729-3) 34.5 kV line with 1200 amp load-break switches, necessary guying, etc.
3	Construct a new 1.14 mile 34.5 kV line from new pole NJ184DTA729 on the West Flemington - Baptistown (A729-3) 34.5 kV line that is overbuilt on 4.8 kV three phase Distribution circuit on all new poles that follows Croton Road, including a replacement of the existing distribution or Telco poles, to a point at or near pole NJ450FT that is adjacent to the boundary of the W3-003 Project site using a minimum 397.5 26/7 ACSR conductor.
4	Transfer the underbuilt distribution circuit to the new transmission poles.
5	Tree trimming and traffic control.
6	Construct a new pole JC1243UF and extend an approximate 200 foot span of overhead 34.5 kV wire to a new Interconnection Customer owned pole at the W3-003 Project site located along Croton Road in Pittstown, New Jersey.
7	Install overhead transmission metering equipment provided by the Interconnection Customer to be mounted on the customer owned pole. (Optional to Collector Substation)
8	Miscellaneous Protection, Fuses, Metering, RTU, SCADA.
9	Detailed environmental review shows probable need for environmental permitting. It is estimated that there will be up to a 6 month lead time for State/Federal review and permit approval, if required. If any protective matting or special vehicles are required for access to poles in wetlands, there will be additional costs.
10	The Interconnection Customer will be responsible for all permits and right of way necessary for the Jersey Central 34.5 kV tap and radial line and the line extension to the W3-003 Project site.
11	The Interconnection Customer will be required to obtain any necessary third party rights of way required to extend the transmission facilities to the W3-003 Project site.
12	The Interconnection Customer to install either a fuse or fault indicators on the tapped connection line from pole NJ450FT.
Total Connection Costs: \$1,216,546 plus \$389,454 tax - \$1,606,000	

Attachment 5
Solar Generation Project Analysis
Interconnection Queues U, V, W
2013 Peak and Light Load Conditions
Full Energy Dispatch

Peak Load Results

Outage Description	Overloaded Element	Line No.	MVAR Rating		% of Rating	
			Normal	Emergency	Normal	Emergency
Base system (n-0) - Normal	East Flemington - West Flemington 34.5 kV	A729	45		140.4	
	West Flemington - West Flemington Tap 34.5 kV	A729	35		236.5	
	West Flemington Tap - Baptistown 34.5 kV	A729	44		188.2	
	Baptistown - Frenchtown 34.5 kV	A729	44		131.2	
Frenchtown - Baptistown (A729) 34.5 kV	East Flemington - West Flemington 34.5 kV	A729		52		133.0
	West Flemington - West Flemington Tap 34.5 kV	A729		44		201.8
	West Flemington Tap - Baptistown 34.5 kV	A729		52		170.7

Light Load Results

Outage Description	Overloaded Element	Line No.	MVAR Rating		% of Rating	
			Normal	Emergency	Normal	Emergency
Base system (n-0) - Normal	East Flemington - West Flemington 34.5 kV	A729	45		169.4	
	West Flemington - West Flemington Tap 34.5 kV	A729	35		256.8	
	West Flemington Tap - Baptistown 34.5 kV	A729	44		204.2	
	Baptistown - Frenchtown 34.5 kV	A729	44		140.4	
Frenchtown - Baptistown (A729) 34.5 kV	East Flemington - West Flemington 34.5 kV	A729		52		152.4
	West Flemington - West Flemington Tap 34.5 kV	A729		44		211.1
	West Flemington Tap - Baptistown 34.5 kV	A729		52		178.6
	Baptistow - Frenchtown 34.5kV	A729		52		140.4

Attachment 6

FirstEnergy Revenue Metering Requirements For Generation Facilities Connected 46 kV and Lower

This document addresses the revenue metering requirements for new generation-only facilities connected to FirstEnergy (FE) system voltages 46 kV and lower. This document is not intended for existing retail or wholesale load facilities where behind-the-meter generation is being installed.

The FE operating company (FEOC) shall provide, own, operate, test, and maintain the revenue metering equipment at the Interconnection Customer's (IC) expense. FE reserves the right to review each proposed generation facility design and determine if the IC shall provide, own, operate, test, and maintain the revenue metering equipment at the IC's expense for engineering reasons.

The revenue metering equipment includes, but is not limited to, current transformers, voltage transformers, secondary wires, meter socket, bidirectional revenue meter, and associated devices.

The revenue metering equipment shall be located at the Point of Interconnection (POI) unless otherwise agreed to by FE and the IC. The revenue metering will be compensated for electrical energy losses if it is not located at the POI.

The IC must provide FE with a facility one line, the estimated bi-directional power flow at the revenue metering point, and any loss compensation data.

The IC shall provide and install the mounting structures (or enclosures) and conduits necessary for the metering installation unless otherwise agreed to by the FEOC. The conduit shall be 1-1/2 inch galvanized rigid steel conduit. Flexible galvanized steel (liquid tight) conduit may be used between instrument transformers. The FEOC will install the wiring in the conduit between the instrument transformers and the meter socket.

The IC shall mount the instrument transformers unless otherwise agreed to by the FEOC. The instrument transformers and meter socket shall be installed in a location that is readily accessible to authorized FEOC representatives. If for any reason the meter socket and/or associated devices must be mounted in a weatherproof enclosure, it shall be provided and installed by the IC. The meter socket shall be installed generally within 50 feet of the instrument transformers unless an alternate design has been approved by the FEOC. The meter socket shall be mounted such that the centerline of the meter is approximately five feet above final grade. Where vehicle traffic may interfere with or damage any revenue metering equipment, the IC must install concrete filled steel barrier posts to protect such equipment.

The bidirectional revenue meter provided and installed by the FEOC will record billing data in intervals typically fifteen minutes or thirty minutes. The IC shall provide, at its sole cost and expense, the installation, operation, and maintenance of the communication link required by the FE billing data collection system for access to the meter. The specifications for the typical telephone communication link are as follows:

- Standard voice grade (analog) with dial tone. No digital telephone lines are permitted.

- Two-pair or four-conductor with RJ-11 / Male termination. The FEOC will make final connection to the meter.
- Must be able to receive incoming calls.
- Must be a direct line to the meter with no operator interception or operation required.
- Install the telephone line and associated conduit between the telephone company source and the meter socket or enclosure.
- The telephone line must be tagged with a phone number, including the area code.
- The telephone line must be installed and operational prior to the IC's service being energized.

The IC shall, at its expense, install, own, operate, test, and maintain any metering and telemetry equipment that may be required to provide real-time meter data to FE or PJM.

The FEOC will provide the IC access to bidirectional kWh and kVARh pulses from the FEOC meter at the IC's expense if requested.

The IC shall provide FE with prior notification of any modifications at the facility that could affect the FEOC revenue meter measurements (substation reconfigurations, generator additions, etc).