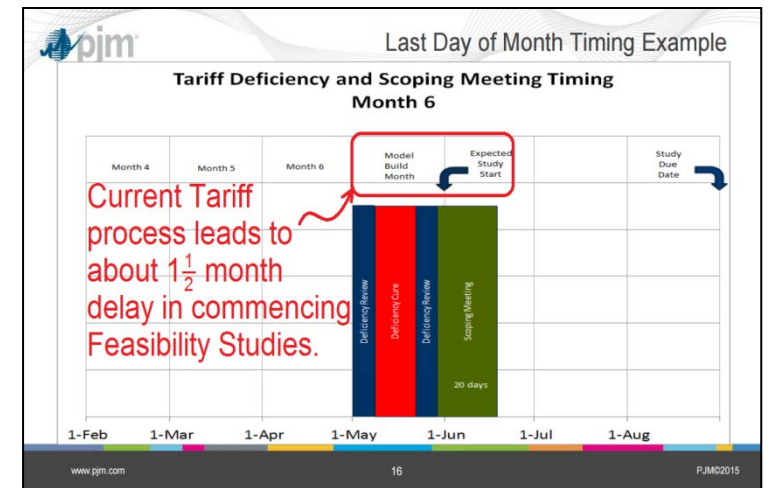
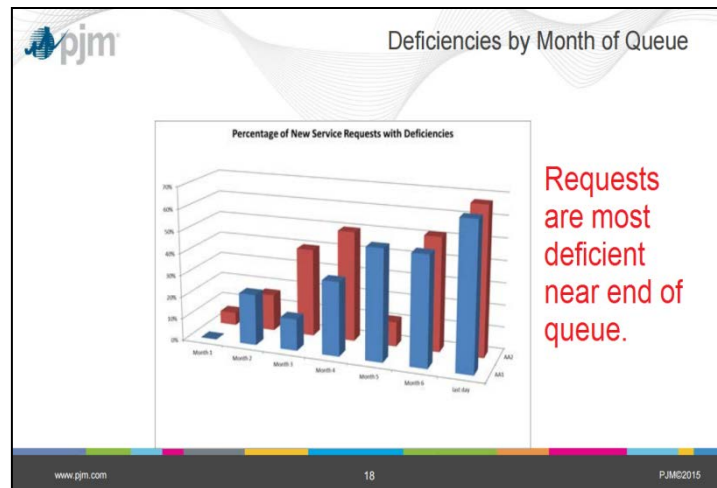
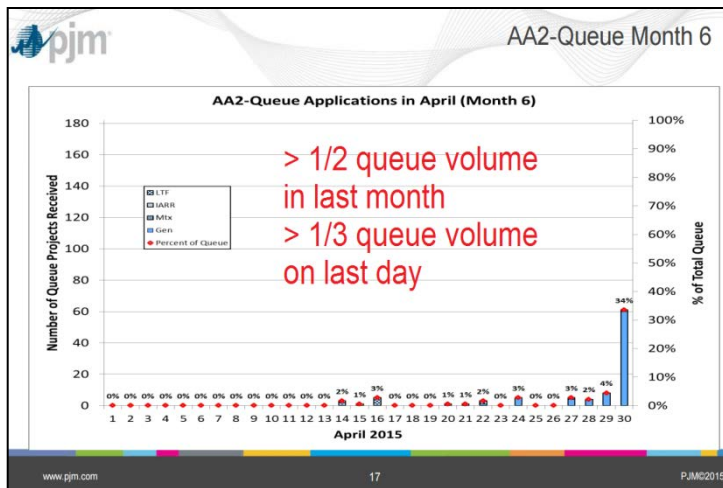


# Earlier Queue Submittal Task Force (EQSTF) Recommended Tariff Changes

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In 2009, the PJM Tariff's queue entry cost structure was modified to incentivize generation and transmission customers to make queue requests earlier in the queue window. Data show that despite the increased cost requirement in the final queue month, PJM still receives about 1/2 of all queue submittals in the last month and about 1/3 of all queue requests in the final days of the queue receipt window.



The Earlier Queue Submittal Task Force conducted the following key work activities and produced the stated deliverables as described in the Issue Charge:

1. Provided education to identify the issues and impacts
2. Identified new methods to better allow PJM to start studies on the designated date
3. Developed a solution that may be implemented for the Feasibility Studies starting May 1, 2016.

Topic	September 2015	October 2015	November 2015	February 2016
types of New Service Requests	✓			
New Services Queue timing	✓			
assigning queue positions	✓			
deficiency reviews (types of deficiencies, timing, cure, failure to cure)	✓			
valid queue requests	✓			
scoping meeting timing	✓			
study and report timing	✓			
deposit structure, purposes, and options	✓	✓		
deficiencies by customer type and project size		✓		
queue and Base Residual Auction timing and differences			✓	✓

- Design Component 1: Queue Priority

<b>Status Quo</b>	<b>EQSTF Proposal</b>
Queue priority based on date of application and deposit.	Queue priority based on submission of all required elements including site control for generation.

- Design Component 2: Deficiency Review

<b>Status Quo</b>	<b>EQSTF Proposal</b>
Deficiency review performed after assignment of queue position.	PJM performs deficiency review after all elements, except site control, are submitted.

- Design Component 3: Criteria for Inclusion in Feasibility Study

Status Quo	EQSTF Proposal
<p>All applications within queue that cleared deficiencies within the Tariff deficiency clearing time are included in Feasibility Studies.</p> <p>Applications that do not clear deficiencies within the time period are terminated and withdrawn.</p>	<p>All applications within queue that cleared deficiencies within the Tariff deficiency clearing time are included in Feasibility Studies, except applications that have not cleared deficiencies by the close of the queue window will be terminated and withdrawn.</p> <p>Applications that timely cleared deficiencies will be included.</p>

- Design Component 4: Timing (review, deficiency clear, scoping)

Status Quo	EQSTF Proposal
<p>Queue Window - 6 months                      Application review - 5 business days                      Deficiency review - 10 business days                      PJM reviews response - 5 business days*                      Scoping meeting deadline - 45/30/20 days</p> <p>* Assumed, not written in Tariff.</p>	<p>Queue Window - 6 months                      Application review - 5 business days                      Deficiency review - 10 business days                      PJM reviews response - 5 business days*                      Scoping meeting deadline - 45/30/20 days</p> <p>* Codified PJM's review periods with Tariff language.</p>



- Design Component 5: Fee Structure for application processing

Status Quo	EQSTF Proposal
<p>Deposits provided do not become available for charging until after the queue position is accepted.</p> <p>PJM notifies customer if study costs are expected to be higher than deposit. Customer can withdraw, but no other requirement to pay further.</p> <p>PJM membership socializes costs for un-cleared applications.</p>	<p>Deposit submitted with application becomes available for charging for PJM application review.</p> <p>PJM notifies customer if study costs are expected to be higher than deposit, and within 10 days customer must pay difference or be withdrawn.</p> <p>Un-cleared applications reviews paid for by customer.</p>

- Design Component 6: Fee Structure for study processing

Status Quo	EQSTF Proposal
<p>Tiered based on application date and size.</p> <p>Separate Refundable and Non-refundable amounts for large generation and merchant transmission requests. Refundable only for small generation.</p> <p>Non-refundable spent first.</p> <p>Remaining non-refundable study deposits refundable upon commercial operation.</p>	<p>Tiered based on application date and size.</p> <p>Non-refundable amount is 10% of overall fee for both large and small generation requests. Fee structures' amounts remain as status quo.</p> <p>Refundable portion is spent first.</p> <p>Remaining non-refundable study deposits refundable upon commercial operation.</p>

- Design Component 7: Start date for changes

<b>Initial EQSTF Goal</b>	<b>EQSTF Proposal</b>
Complete all stakeholder activities, FERC Tariff change filings, and PJM Manual changes for May 1, 2016 implementation.	Complete all stakeholder activities, FERC Tariff change filings, and PJM Manual changes for <b>November 1, 2016</b> implementation.

- Design Component 8: Feasibility Study start and end date

Status Quo	EQSTF Proposal
<p>Study month duration is three months</p>	<p>Study duration remains as three months</p>
<p>Queue windows commence May 1 and November 1.</p>	<p>Five month transition queue November 1, 2016. Then queue windows commence April 1 and October 1.</p>
<p>Feasibility Studies start Dec 1 and June 1.</p>	<p>After transition, Feasibility Studies start November 1 and May 1.</p>
<p>Difficult for large generation to participate in BRA.</p>	<p>Improves small and large generation ability to participate in BRA from both annual queues.</p>

- Redline in outline format – actual Tariff section numbering may differ
- Eliminated one Tariff section referring another– each Tariff section stands alone
- To permit data review prior to site control submittal, PJM establish a queue for the queue
- Work Breakdown Structure (WBS) initiated upon queue application submittal
- Withdrawn application's deposits no longer transferrable to a resubmitted application
- Non-refundable deposit usage changes: collect less money and used only for withdrawal restudies – not applied towards study costs – becomes refundable upon commercial operation
- Deleted historical, no longer valid Tariff time period sections
- Attachment N:
  - reorganized to make it easier for customers to complete the form
  - customer certification for required submittals
  - minimum duration requirements for site control
  - customer to provided site boundary map with proposed arrangement
- Queue timing aligned to balance BRA participation between small and large generation
- PJM to post zonal study costs for Feasibility and System Impact Studies

Topic	36.1.01 (gen)	36.1.03 (mtx)	36.2 (Feas timing)	110 (Capacity)	111 (energy)	112 (temporary)	112A (screens)	201 (SIS)	204 (SIS fees)	205 (SIS timing)	Attachment N	Attachment N-1	Attachment S	Attachment Y	Attachment BB
Design Component 1: Queue Priority	✓	✓		✓	✓	✓	✓	✓			✓		✓		
Design Component 2: Deficiency Review	✓	✓		✓	✓	✓	✓								
Design Component 3: Study Inclusion	✓	✓		✓	✓	✓	✓	✓	✓						
Design Component 4: Timing (Processing)	✓	✓		✓	✓	✓	✓								
Design Component 5: Fee (Processing)	✓	✓		✓	✓	✓	✓				✓		✓	✓	
Design Component 6: Fee (Study)	✓	✓		✓	✓	✓	✓		✓		✓	✓	✓	✓	✓
Design Component 8: Timing (Queue windows)			✓							✓					