

NEW SERVICE REQUEST REVIEW PERIOD

Problem / Opportunity Statement

Summary

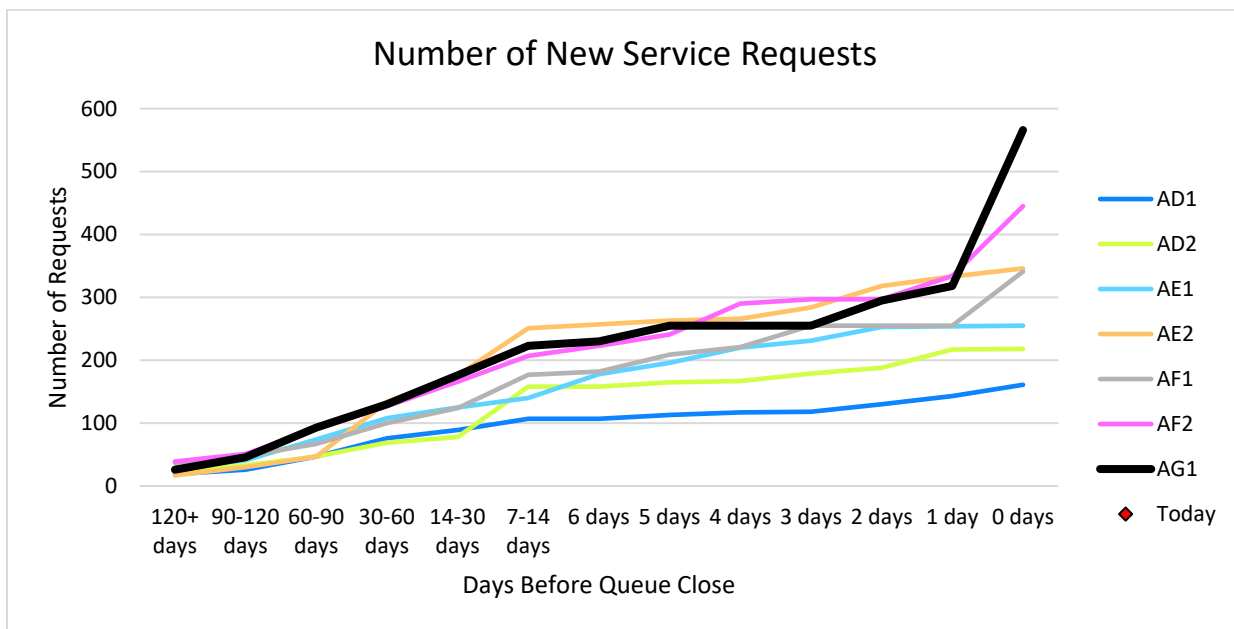
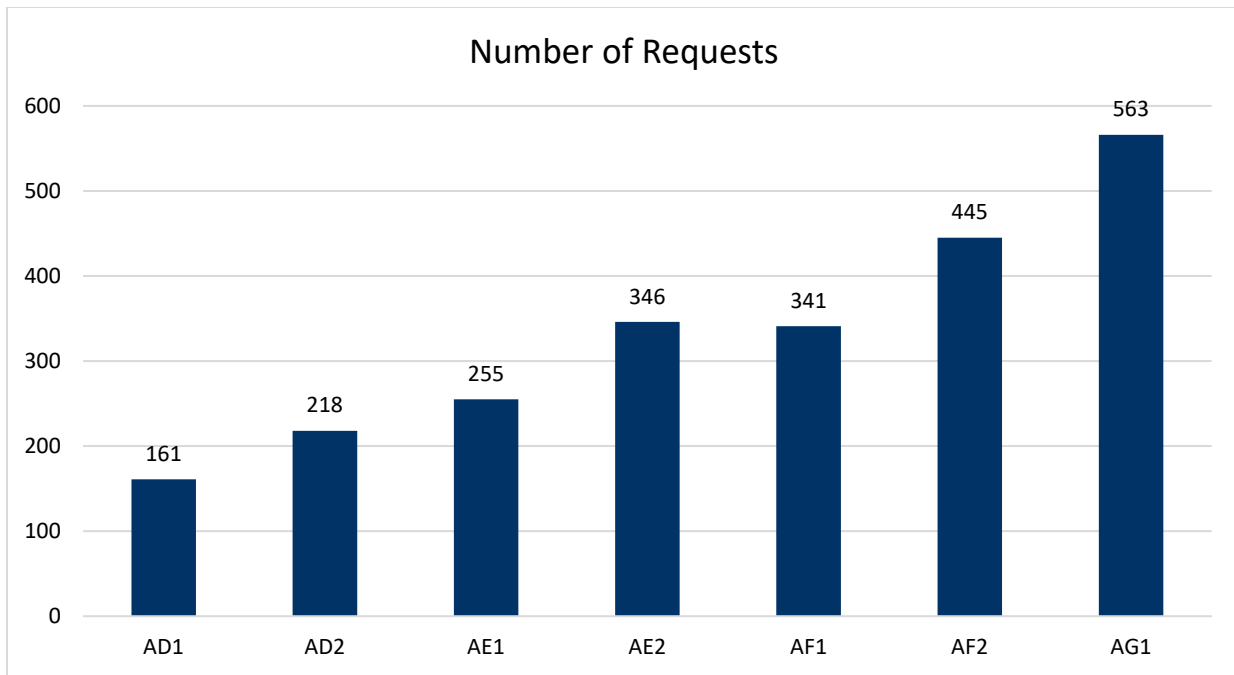
- Currently the PJM rules provide that the New Services Queues close on March 31 and September 30 each year, and provide a five Business Day period for PJM to acknowledge receipt of a New Service Request, undertake a deficiency review of a New Service Request, or review the information provided by an Interconnection Customer in response to the initial deficiency notice. In the AG1 queue that closed on September 30, roughly 60% of the New Service Requests were submitted in the last week of the six month window, putting tremendous pressure on PJM staff to meet the tariff deadlines.

Deficiency Reviews

The existing PJM rules require PJM to acknowledge receipt of a New Service Request, undertake a deficiency review of a New Service Request, or review the information provided by an Interconnection Customer in response to the initial deficiency notice - all within five Business Days:

- The Transmission Provider shall acknowledge receipt of the Generation Interconnection Request (electronically when available to all parties, otherwise written) within five Business Days after receipt of the request and shall attach a copy of the received Generation Interconnection Request to the Transmission Provider's acknowledgment.
- Deficiency Review. Within five Business Days of the Interconnection Customer submitting a Generation Interconnection Request, Transmission Provider shall provide a deficiency review of the Generation Interconnection Request to determine whether the Interconnection Customer submitted a valid Generation Interconnection Request.
- If there are deficiencies in the Generation Interconnection Request for any of the requirements set forth above, the Transmission Provider shall notify the Interconnection Customer (electronically when available to all parties, otherwise written) within five Business Days of receipt of the Generation Interconnection Request that such Generation Interconnection Request is deficient. This notification is referred to as a deficiency notice.
- Without regard to the timing of the Interconnection Customer's deficiency response period, the Transmission Provider shall have an additional five Business Days to review each Interconnection Customer's response to the deficiency notice. If the Generation Interconnection Request is still deficient after the Transmission Provider's additional five Business Day review and the full ten Business Days of the Interconnection Customer's deficiency response period have expired, the Generation Interconnection Request shall be deemed to be terminated and withdrawn.

The deficiency review process requires a thorough look at the application, data submittal, and site control and it requires review by at least two departments in PJM. While the five Business Day time period is sufficient when the number of Generation Interconnection Requests being submitted each day and each week is normal, the current trends in the New Service Queue show that the volume of projects being submitted is increasing, particularly in the last days of the queue window, which results in too many incoming projects for the five Business Day time period to be adequate.



In the AG1 queue window which closed on September 30, 340 New Service Requests were submitted in the last week of the queue with 245 of those requests coming in the last day. The timing makes it physically impossible for staff to respond adequately to that many applications within the five Business Days period. In the AF2 queue, PJM filed for a waiver of the review period due to the sudden work from home situation due to COVID-19. This also allowed PJM to accommodate the influx during the last week of the queue. In the AG1 queue, PJM filed for a waiver of the five Business Day rule due to the volume at the end of the queue. PJM does not anticipate that the queue

volume or the timing of submissions will change substantially in the future, and therefore seeks to avoid the need to request Commission waivers at the end of each Queue window indefinitely.

New Services Queue Closing Timeline

The existing PJM rules require that the New Services Queues close on March 31 and September 30 each year. Generation Interconnection Requests may be submitted up to midnight on those closing dates. The next Queue window opens immediately after the midnight close. The volume of Generation Interconnection Requests that come in at the very end of the Queue window, combined with the beginning of the next Queue and the short deficiency review periods, puts extreme time pressure on staff to review Generation Interconnection Requests for the Queue that just closed and the Queue that is beginning without affecting the timing of the model build for the Queue that just closed. PJM would like to provide a short period of time between New Services Queues to alleviate the time pressure on the model build.