

Interconnection Queue Delays: Findings and Discussion Points

1. Additional PJM Near Term Actions? Tighten the tolerances by spreading applications, reducing wait times, and limiting flexibility
 - a. Monthly application caps: PJM and TOS have been adversely impacted by the bi-annual cadence of the intake window. From a process engineering perspective, smoothing the intake to a manageable level could benefit all. While some may feel this is a tariff change, PJM should try to attempt to justify this process change by arguing that: a. the current volume increases and resulting delays and are extenuating circumstances, and call for emergency action, and that b. this process change wouldn't change the nature of the intake, which is first come, first served
 - b. Shorten developer consideration windows: PJM provides reasonably generous participant time allocations (such as the 60 days developers are allowed to execute an ISA) and can shorten those time periods.
 - c. Place limits on modifications & studies: Tariff does not limit number of material modification studies that can be requested or when. Interconnection customer not required to provide evidence that requested change likely doesn't impact later projects in queue.
2. Retool optimization & transparency: The heart of interconnection delays and the least understood sub-process
 - a. Provide transparency: Separate the Facilities Studies into two sub-reports and publicly track performance metrics to tariff defined deadlines
 - b. PJM needs to own re-tool re-design: All evidence points to the re-tool structure being at the heart of the problem. Yet, the re-tool mechanics were not covered (in detail) at either of the recent stakeholder sessions. This means that Stakeholders don't have enough info. and knowledge to properly inform a re-tool re-structure. This is NOT problematic, IF PJM takes the time to re-design its re-tool process and present the proposed future state to stakeholders. Having the stakeholders collaborate on the needs analysis and design is akin to having the tail wag the dog.
3. Verification that past under-investment has been effectively addressed and won't be a problem going forward
 - a. Staffing: PJM is still understaffed for current application volumes and high turnover is exacerbating the issue. A staffing plan needs attention and timeline should be provided for implementing solutions; All communications to date indicate that this has become a chronic problem that won't simply be addressed by reactionary hiring.
 - b. Communication and co-ordination tools: Call after call indicates that TO Planning Engineer to PJM Planning Engineer/ Project Manager communications are not as precise as would be expected. Confusion re: applicable upgrades and appropriate timelines signal potential systems issues. Improving the tools that PJM staff use to coordinate with its key partners has not been a focus in stakeholder review sessions....largely because stakeholders trust that PJM is following a tech roadmap that is commensurate with its business growth.



To discuss these concepts in more detail, please contact:

Byron Crawford

Renewable Development Manager

byroncf@amazon.com

