

Note: Company names have been removed to protect confidentiality.

With regards to economic eligibility & readiness criteria for AE1-AG1 projects to be processed under the current serial cost allocation methodology, which option(s) can you support? Please provide any additional comments you would like to share related.

- Allowing projects with NU allocation to remain in the serial processing adds risk of additional re-tooling and study delays.
- Backlog needs to be culled of infeasible projects; increased readiness requirements provides a means to filter out projects most responsible for clogging up the queues.
- "Comment on Question 8, Option 1 ("Clean Projects") • We'd like to see 20% security (of NU) associated with proceeding in serial process. • At the 11/30 IPRTF meeting, there was discussion on whether "Clean" includes projects with zero Network Upgrades, but with a dependency such as a supplemental project build. Our company supports including these "dependency" queue positions within the "clean" category on the grounds that these projects are comparable with similar zero network upgrades projects without a dependency and are essentially just waiting on their studies to be finalized to move ahead. "
- If projects with NU allocations are allowed, non-refundable security MUST be posted
- It is wise to include a modest amount of NU. 50k may already be too high.
- It seems like any option to allow projects with upgrade requirements in the "Fast Lane" will complicate processing of both the Fast Lane and the subsequent transition queue, tangling the two up in each other.
- My company is concerned about the lack of progress in the queue, which has a significant negative impact on the ability of developers - especially small developers like my company - to build generation. Given the rapid acceleration of climate goals, PJM needs timely development of renewable generation.
- My selection of \$0 to be "clean" is the fastest way to resolving backlogged queue with minimal retooling delays.
- PJM should establish a requirement that projects will also need to be developed and procured to meet state mandated renewable portfolio standards and those types of projects will be eligible for fast track prioritization.
- Projects that entered the queue under the original framework should be allowed the choice to continue in that framework irrespective of network upgrade cost allocation.
- State jurisdictional projects in states with no well established and reliable interconnection process (such as Pennsylvania) should be treated the same as FERC jurisdictional projects during the transition and under the reformed interconnection rules. It is highly discriminatory to leave these projects with no path to access to the wholesale electricity market, which is the case if there is no state level interconnection process and projects are not allowed access to the PJM queue.
- The scope of the "grandfathered" serial processing must be based on an objective standard/criteria for it to be workable and to mitigate subjective opposition and challenge relative to arbitrary criteria, which could be subject to challenge. The simplest and cleanest way to achieve an objective standard is to define the serial pool in terms of zero impacts. All other eligibility criteria will be subject to some degree of opposition based on subjective opposition and beliefs that it is too high or low. PJM must move this process along and zero impacts is the cleanest way to do this, and it provides the added functional benefits of efficient processing

and mitigating impacts to subsequent cluster queues because zero impact projects present the least risk of withdrawal due to changes in upgrade and cost responsibility. The foregoing notwithstanding, We support imposing financial readiness requirements for all the backlogged projects through AG1 queue.

- This assumes \$4,000/MW readiness payment has already been paid
- We cannot support any of these options. All AE1-AG2 projects should have the option to be processed under the current serial cost allocation methodology.
- We share PJM's concerns about using any "economic viability" threshold. We think this increases uncertainty and delays getting to the cluster process. We are also concerned about the potential for litigation/challenge regarding Network Upgrade cost estimates.
- A mix of gating criteria and market approach will ensure a reasonable amount of choice and flexibility while minimizing the possibility that high-risk projects remain in the serial queue. IG Choice has been clearly stated as a priority by the stakeholder group and this approach ensures some choice vs. no choice under the "clean only" approach.
- As long as projects are willing to pay for network upgrades with significant readiness requirement, they should be given that option.
- Earlier polls showed broad support for IC choice and it is disappointing to see a PJM proposal with such narrow parameters. The best solution would allow projects through AF2 to stay in the old system with high security requirements.
- Economic critical impact to small projects challenges non discriminatory open access in the interconnection process
- If projects with NU allocations are allowed, non-refundable security MUST be posted
- In reviewing all FERC-approved transition proposals across 7 other RTOs, FERC has been clear that the guidance order from 2008 of "careful consideration" for late-stage projects (i.e. SIS in-hand and Facilities Study Agreement signed) is a key consideration. We do not believe that PJM's transition proposal provides sufficient 'careful consideration' for late-stage projects.
- May be willing to accept a smaller amount of NUs (\$25k or less, even down to \$10k). If financial readiness deposits are not at risk at this point in the process, then may be little value in including as incentive. If the TOs strongly support only \$0 NU projects moving forward then we would go along with that.
- Not preferred but if the will of the stakeholder group wants additional projects, We support following proposal. Projects with modest NU allocation (up to \$50k/MWac or lower) in the re-tooled SIS are eligible for serial processing, with additional financial readiness requirement
- PJM has proposed \$4k/MW readiness requirement. Any additional financial readiness requirement can be treated in the same way as PJM's \$4k/MW in their proposal (i.e. dealing with such funds is not novel or problematic vs. the important value of such a financial requirement in "culling" the serial queue of uncertain projects)
- PJM has raised concerns about complexity in holding on to substantial sums of \$\$\$ for financial readiness requirements as an argument for not requiring higher financial readiness requirements for the transitional serial queue. This concern is relatively insignificant compared to the benefit of culling the queue using an additional financial readiness requirement, and this issue seems entirely surmountable. PJM's own proposal requires PJM to manage a \$4k/MW deposit, so this seems like a problem that should not be

driving decisions regarding if/how to allow late-stage projects that have been developed under existing rules for years to continue without disruption/harm from new rules.

- PJM has raised concerns about debate/pushback by ICs who are just over any predetermined \$/MW NU allocation gating criteria as a reason not to utilize a \$/MW NU allocation metric as a gating criteria for remaining in the serial queue. First, this dynamic would also apply to PJM's proposal to only allow projects with \$0/MW NU allocation to remain in the serial queue. Secondly, any gating criteria higher than \$0/MW NU will be more defensible at FERC because it gives more IC choice and careful consideration of late-stage project interests.
- PJM's proposal of "clean" projects being eligible for Fast Lane processing is a step forward, however, it's not a step far enough forward to address the interest of projects that have been in the queue since 20018. As such, we believe the eligibility of projects for serial processing should be expanded to those that meet a broader \$/MW threshold vs PJM's proposal of \$0/MW
- Projects that entered the queue under the original framework should be allowed the choice to continue in that framework irrespective of network upgrade cost allocation.
- Projects with economically viable network upgrade cost allocation should be given an opportunity to complete the serial process with security (readiness deposits) comparable to the transition cluster. The current proposal is 20% of NU costs prior to entering Facilities Studies, therefore additional financial readiness requirements should be 20% of network upgrade cost.
- State jurisdictional projects in states with no well established and reliable interconnection process (such as Pennsylvania) should be treated the same as FERC jurisdictional projects during the transition and under the reformed interconnection rules. It is highly discriminatory to leave these projects with no path to access to the wholesale electricity market, which is the case if there is no state level interconnection process and projects are not allowed access to the PJM queue.
- True IC choice would be preferable
- We agree with PJM that setting a \$ threshold will be administratively complicated and lead to significant disputes that will ultimately slow the process down.
- We cannot support any of these options. All AE1-AG2 projects should have the option to be processed under the current serial cost allocation methodology.
- We share PJM's concerns about using any "economic viability" threshold. We think this increases uncertainty and delays getting to the cluster process. We are also concerned about the potential for litigation/challenge regarding Network Upgrade cost estimates.

Regarding the processing of queues beyond AG1, which option(s) can you support? Please provide any additional comments you would like to share related to the processing of queues beyond AG1.

- Adding AG1, AH1, and AH2 projects to New Cluster A would be the quickest way to complete the transition with a minimal blackout period for new requests. However, considering that the AG2 queue opened in October 2020 prior to the IPRTF transition proposals being introduced, it may be reasonable to process AG2 as its own Transition Cycle to preserve priority.
- AG2 processed per the Clearway (Option C) package. AG2 CANNOT be kicked out of the queue and forced to reapply.

- In addition to above selections, please also consider the option of having AG2 in its own transitional cluster, and AH1 in its own cluster. At a minimal, for projects currently in the queue, PJM should modify its proposal to state that it will 'place a hold' on projects already in the queue and designated for New Cluster A, rather than kicking them out of the queue and forcing them to reapply. While the timeframe for processing may be the same either way, this is a meaningful difference for developers in terms of our ability to demonstrate a queue position and an understanding of when the project will be processed as we seek to value our portfolios and transact projects.
- It is completely reasonable to have all queues post AG1 reapply in the new queue process because PJM has not taken any action in regards to these queues/projects, and, therefore, they have no legacy rights expectations that would be impacted by moving these queues to the new process. Furthermore, allowing them to be processed in the transition cycles would significantly undermine the effective, efficient and timely progression to the new GI process; and as noted, there is no legacy rights basis to support the position of keeping these queues in the transition cycles generally, and especially in light of the goal of moving to a more effective process as soon as practicable.
- It would appear the best option for AG2 and beyond would be to start fresh in a process that will have some clear timelines and a cleaner study process.
- My company has a significant amount of capital, time and resources already tied up in its AH2 project. Having to reapply will kill the project completely.
- Processing of AG2 queues through AH2 queues should be able to continue under the existing serial process to ensure that they are not delayed further. Under PJM's proposed transition mechanism, it would mean those projects that were submitted as early as October 2020 for the AG2 t would take up to 6 years to reach a signed agreement. Although the PJM proposal would allow "clean" projects an off ramp to more quickly seek signing a final agreement, those would likely be smaller projects. A separate Transitional Cycle 2 for queues AG2 and beyond should be dependent upon when a final order is received from the FERC, in the event that the final Order is issued beyond AH2 start date or the targeted October 2022 effective date. As noted in the previous questions, PJM should establish a requirement that projects will also need to be developed and procured to meet state mandated renewable portfolio standards and those types of projects will be eligible for fast track prioritization.
- Projects in the AG2 and AH1 queues should be included in the fast lane process, or a second fast lane shall be developed before Transition Cycle #1 to allow more clean projects to connect to the system while respecting the existing rules/ queue priority.
- Second choice would be to kick out AG2-AH2 and have them re-apply.
- Since this question is informing the separate polling on transition options, please include the number of projects that would be included under each option in that polling. Please also include a slide 11 type graphic to illustrate each option in that transition polling.
- Support for a Transition Cycle 2 assumes Study and Readiness Deposits equal to or greater than PJM proposed requirements.
- These queues all originated after this process was started - they have no preemptory rights.
- We believe that projects that entered the queue under the original framework should be allowed the choice to continue in that framework. We cannot support any of the presented options as they do not provide an option for the projects to be processed per the tariff in effect at the time of application.

- We cannot support any option that kicks AG2 projects out of the queue. Processing AG2 projects first is a completely reasonable tradeoff for having new projects that do not currently exist having to wait to be processed.
- AG2 entered the queue without any knowledge of what changes were coming. At a minimum, that cluster should remain separate with only modification for the cluster requirements allowed.
- AG2 is a massive queue with almost 700 projects that should be its own cluster.
- AG2 likely needs its own cluster given its size
- AG2 likely needs its own cluster given its size, and AG2 projects should retain some sort of priority given the timing of their queue entry.
- AG2 projects are unfairly disadvantaged relative to the AH1 and later projects in the queue.
- AG2 projects have the best argument for consideration via its own transitional cluster vs. being kicked out of queue.
- AG2 queue deadline closed before the IPRTF was initiated. Developers/investors made investment decision without any knowledge of these changes and AG2 projects should therefore not be kicked out of the queue and be forced to reapply with new requirements.
- AH1 and AH2 projects should not have to reapply if they wish to remain in the process. This will cause a great amount of rework that has already been completed by staff. The reapplications will risk delaying the overall process needlessly.
- AH1 and out should be in Cluster A but should NOT have to reapply.
- AH1/AH2 are less mature and will have a less convincing case before FERC. AG2 has a more reasonable claim to its own transition cluster.
- For the above options, a small portion of A11 may also need to be included in this grouping due to the timing of the filing. Given that projects from five queue groups are being clustered to be Transition Cluster #1 (AE1/AE2/AF1/AF2/AG1), and since PJM has stated they can handle a large cluster, there is no reason to separate AG2 from subsequent queue groups. This will add unnecessary delays and runs counter to PJM and the entire market's goals of minimizing the blackout period for applications.
- Giving AG2 a transitional cluster would be a reasonable accommodation that would gain more support but still allow the transition to be completed ahead of the prior PJM Option 3 schedule
- Goal is to size the clusters appropriately. If the cycles are too large, they may take longer than expected and go against the goal of trying to get newer projects processed sooner
- In addition to above selections, please also consider the option of having AG2 in its own transitional cluster, and AH1 in its own cluster. At a minimal, for projects currently in the queue, PJM should modify its proposal to state that it will 'place a hold' on projects already in the queue and designated for New Cluster A, rather than kicking them out of the queue and forcing them to reapply. While the timeframe for processing may be the same either way, this is a meaningful difference for developers in terms of our ability to demonstrate a queue position and an understanding of when the project will be processed as we seek to value our portfolios and transact projects.
- It is reasonable to provide AG2 more consideration in its own transitional cluster after the AE1-AG1 transitional cluster and doing so will garner maximum support towards a consensus transition proposal.

AH1 has less of a claim to the existing process and including it in a transitional cluster will make that cluster very large. Re-queuing AG2-AH2 would likely raise significant opposition and concerns at FERC.

- It takes time to pull a new submission together and Projects that have met the PJM filing requirements should have priority over yet to be filed Projects. Withdrawal of projects that met PJM's filing requirements has a detrimental financial implication on the filing company.
- Preserving AG2 priority is justified as this queue was completely caught off guard by the reform process. Kicking AG2 off the queue sends the wrong market signal that ISOs can completely change the rule ex-post - noting also that this is PJM's largest queue.
- Second choice would be to kick out AG2-AH2 and have them re-apply.
- We believe that projects that entered the queue under the original framework should be allowed the choice to continue in that framework. We cannot support any of the presented options as they do not provide an option for the projects to be processed per the tariff in effect at the time of application.
- We cannot support any option that kicks AG2 projects out of the queue. Processing AG2 projects first is a completely reasonable tradeoff for having new projects that do not currently exist having to wait to be processed.
- We now know the universe of AG2 projects. Allowing them to drop out and reapply can change things significantly. MFO could increase, etc.
- We understand about striking the right balance to create a consensus, so if AH1 and AH2 don't stay in the Transitional Cycle 2, PJM should modify its proposal to state that it will 'place a hold' on projects already in the queue and designated for New Cluster A, rather than kicking them out of the queue and forcing them to reapply. While the timeframe for processing may be the same either way, this is a meaningful difference for developers in terms of our ability to demonstrate a queue position and maintaining some priority over a project that hasn't applied for interconnection yet.
- We would support any option that allows for serial processing of AG2 queue projects.

Please provide any additional comments you would like to share.

- Although we support the PJM cluster based interconnection proposal, it does not mean that we support the transition mechanism that was proposed at the November 30th task force meeting. We believe that proposal would unreasonably stall the development of projects in AG2, resulting very few if any projects at all to sign final ISAs and have widespread implications on projects seeking timely commercial operation. At a minimum, PJM should reconsider adopting its Option 4 with modifications made in the Dominion Energy letter. If it is inclined to move forward with its new transition proposal, PJM should create a separate Transitional Cycle 2 for projects in future queues beginning AG2 until a decision is issued by the FERC. As noted in the previous questions, PJM should establish a requirement that projects will also need to be developed and procured to meet state mandated renewable portfolio standards and those types of projects will be eligible for fast track prioritization.
- As development costs balloon in PJM because of increases in deposits, time in queue, and other restrictions, my company will look to develop in other RTOs where a positive return on investment can be earned. My company understands PJM's frustration with "paper" projects but many components of the new process make it almost impossible for small, less capitalized developers to work in PJM. For example, the carrying costs for all the deposits in the current queue timeline are non-trivial.

- "Comments on alternate proposals: CRR/ORR: • Non-material changes to POI – yes • Affected system studies identified in Phase 1 – yes • Max feasible cost cap for affected system upgrades in Phase 1 – yes, if realistic to provide • Results of Affected Systems study by Phase 2 – yes • Adverse Study Test at end of Phase 2 – yes • WPMA treatment – generally agree with CRR/ORR comments

RWE: • Phase 1 – Affected systems screening and outlet issues screening – yes, if realistic perform • Draft results before decision points – yes • Phase 2 – include prelim affected systems and outlet issues – yes • Phase 2 – Affected systems upgrades identified – yes • Provide at least 5 days for model review – yes • Phase 3 – Affected systems upgrades identified - yes • Incremental financial rights - yes "
- Comments on PJM Option A • Matrix does not state that RD2 and RD3 (10% and 20%, respectively) are reduced by any amounts paid in prior Readiness Deposits, as is shown in the Powerpoint • Matrix does not state when RD2 goes at risk • Election of Option to Build should still be allowed after results of Phase 2 Interconnection Upgrade Facility Study is complete and IC has received cost and schedule estimates. Facility study could be re-done in Phase 3 under Option to Build assumption • In all phases, draft reports should be released prior to initiating the Decision Point windows. This allows for corrections and adjustment of required security and a full 30 days for IC to analyze and secure funds and other requirements. NOTE SPP did not release draft results in advance of the decision point windows in its initial implementation of a three stage process and lost a challenge by an IC at FERC, resulting in a project being reinstated after being withdrawn and the need for additional re-studies. • Affected system studies should be arranged by PJM with the funding covered by study deposit paid to PJM by IC. Initial study should be completed in Phase 2 so ICs do not move forward without knowledge of upgrades. • Matrix does not address penalty free withdrawal provisions • Specific site control requirements (acres per MW) should be listed in matrix • Specific items from other proposals to be included in PJM Option A package: • Clearway package POI suggestion of maintaining separate GIAs for different projects at one POI is valuable to maintain customer flexibility. If same parent company, MW impact thresholds should be counted together. • CCR/ORR package POI suggestion to allow non-material changes to POI • RWE package Model Review requirement to post contingency files and deliverability study files • RWE's package comment about PJM sharing draft results ahead of decision windows • RWE package SIS project info clarify that 100% site control is still acres/MW based • Clearway package suggestion to send email updates when schedule changes occur • Clearway/RWE packages suggestions to have group kick-off calls for each phase • CCR/ORR/RWE packages suggestions about affected systems • Clearway package suggestion to allow continued size reduction flexibility (but not reducing obligation to fund any shared upgrades in original allocation) • Clearway package suggestion to review cost allocation shift factors and contribution to overload thresholds. Low thresholds result in high interdependency and larger impacts from late stage withdrawals.
- Need to reflect non-zero network upgrades in the fast-track need to clear out larger units sitting on holds for extended times in simplifying remodeling.
- PJM package (A) is unjust and unreasonable for AG2 projects.
- Some of the proposals contain elements we can support: 1) Reimbursement of NU costs up to a cost cap (CAISO is currently ~\$72k/MW and adjusted by inflation); 2) Having a mechanism to have states/public policy pick up NU cost responsibility; 3) clarifying that continuous site control is required; 4) IC responsible for Affected System Studies (in particular, PJM should not allow delay of a cluster due to incomplete Affected System Studies). Some proposals contain elements we cannot support: 1) security in lieu of site control; 2) PJM assessment of constructability of site (would prefer to retain current guidance); 3) delays in transitioning to routine cluster process.

- Thank you for providing the opportunity to comment on this important process. There are few key items that we would like to provide our support and rationale. PJM should continue to revert back to the root cause of the queue backlog. This root cause is that PJM had the least expensive interconnection costs of any RTO in the country. Since the barrier to entry was so low it created problems where site control lapsed or was unreasonable. The root cause of this issue has been corrected since the readiness deposits have increased by an order of magnitude. PJM should not be forcing development decisions like making companies execute their leases or purchases at ISA execution. This is a reaction to the current situation and it is unprecedented and unnecessary. PJM should incorporate interconnection customer draft model and report reviews as part of the process. In other regions there are significant errors found by interconnection customers. Allowing a draft report is critical to prevent rework. If there is an Interconnection Customer sign off period on the report it will prevent FERC complaints and disputes that drastically delay the entire process. PJM should coordinate Affected Systems studies as is done in MISO. With the 2-3x increase in study deposits PJM should have ample resources to coordinate this activity and it will help increase the readiness theme of the whole process. Affected Systems are the single largest source of delays in MISO. Since PJM is mirroring MISO's process it only makes sense to acknowledge this very important problem in MISO's process. Putting the Affected Systems work on the Interconnection Customer would create more problems and increase the chance of projects not being ready. Intracluster funding should be added into the process mirroring MISO. This should only be done for large upgrades >\$20M. Although precedence has shown that decisions may not be made based on potential future allocations that does not mean it will continue. The overwhelming majority of projects that have been constructed or are being constructed have consumed excess capacity on the grid. With increased congestion and the need for more renewable energy this will shift and more projects are going to be facing network upgrades. Interconnection customers can structure transactions to account for future funding and eliminate uncertainty of future allocation. Interconnection Customers are already fronting the cost of network upgrades that have shown time and time again to benefit many more parties than just a single interconnection project. Intracluster funding should be added in to coincide with the benefits and eliminate free riders. PJM has done a great job working with the stakeholder community. Some of the key updates to their plan have been eliminating cost risk before the actual study begins, lessening the site control requirements and adding in the ability for the IC to shift milestone dates. Thank you for your continued work on these issues and we hope to continue finding the best solution for all parties.
- This company believes the current PJM new process and transition process are reasonable means to achieve the goal of this initiative, which is meaningful queue reform in a timely manner. These proposals reflect months of stakeholder discussions and shouldn't be changed at this point of time as any additional changes pose the risk of undermining the goal of meaningful queue reform.
- We appreciate all of PJM's hard work during this process. We recognize how difficult this process has been and how difficult it is to accommodate everyone's issues.
- We are conceptually aligned on the cluster cost allocation structure for the new interconnection process however, there are significant requirements in each proposal that we cannot support. Issues including but not limited to, site control requirements, affected systems coordination, project site modifications and suspension rights need to be much further developed before we can provide support.
- We highly support having AG-2 and AH-1 having their own cycle.
- A Penalty Free Withdrawal (PFW) mechanism must be included in the final design. A PFW permits an Interconnection Customer (IC) to withdraw from the GI study process, and receive 100% reimbursement of their posted Readiness Deposits, in the event their total GI upgrade cost increases by a fixed amount from the prior study. (Avangrid & Genex Coalition original transition proposals included PFW). PFW is advantageous to all stakeholders as it allows ICs, especially those "riding the fence", to easily decide to

withdraw earlier in the GI study process. It also mitigates unjust financial exposure an IC may incur due to human error, affected system study surprises, FERC waivers that cause restudies, etc. Without such mechanism, an IC that is convinced they will lose their initial Readiness Deposit, is more likely to double down with another Readiness Deposit in an attempt to obtain a better study result. Such action is highly disruptive to the study process as it usually results in very late-stage withdrawals, additional wasted study analysis by PJM engineers, additional paperwork by PJM Legal if the IC withdraws after ISA execution, and possibly even FERC challenges.

- Affected System coordination, study processes, communication, and alignment require attention and solution development between PJM and adjacent regions.
- Comments on alternate proposals: CRR/ORR: Non-material changes to POI – yes Affected system studies identified in Phase 1 – yes Max feasible cost cap for affected system upgrades in Phase 1 – yes, if realistic to provide Results of Affected Systems study by Phase 2 – yes Adverse Study Test at end of Phase 2 – yes WPMA treatment – generally agree with CRR/ORR comments RWE: Phase 1 – Affected systems screening and outlet issues screening – yes, if realistic perform Draft results before decision points – yes Phase 2 – include prelim affected systems and outlet issues – yes Phase 2 – Affected systems upgrades identified – yes Provide at least 5 days for model review – yes Phase 3 – Affected systems upgrades identified - yes Incremental financial rights - yes
- Comments on PJM Option A • Matrix does not state that RD2 and RD3 (10% and 20%, respectively) are reduced by any amounts paid in prior Readiness Deposits, as is shown in the Powerpoints • Matrix does not state when RD2 goes at risk • Election of Option to Build should still be allowed after results of Phase 2 Interconnection Upgrade Facility Study is complete and IC has received cost and schedule estimates. Facility study could be re-done in Phase 3 under Option to Build assumption • In all phases, draft reports should be released prior to initiating the Decision Point windows. This allows for corrections and adjustment of required security and a full 30 days for IC to analyze and secure funds and other requirements. NOTE SPP did not release draft results in advance of the decision point windows in its initial implementation of a three stage process and lost a challenge by an IC at FERC, resulting in a project being reinstated after being withdrawn and the need for additional re-studies. • Affected system studies should be arranged by PJM with the funding covered by study deposit paid to PJM by IC. Initial study should be completed in Phase 2 so ICs do not move forward without knowledge of upgrades. • Matrix does not address penalty free withdrawal provisions • Specific site control requirements (acres per MW) should be listed in matrix Specific items from other proposals to be included in PJM Option A: • Clearway POI suggestion of maintaining separate GIAs for different projects at one POI is valuable to maintain customer flexibility. If same parent company, MW impact thresholds should be counted together. • CCR/ORR POI suggestion to allow non-material changes to POI • RWE Model Review requirement to post contingency files and deliverability study files • RWE's comment about PJM sharing draft results ahead of decision windows • RWE SIS project info clarify that 100% site control is still acres/MW based • Clearway suggestion to send email updates when schedule changes occur • Clearway/RWE suggestions to have group kick-off calls for each phase • CCR/ORR/RWE suggestions about affected systems • Clearway suggestion to allow continued size reduction flexibility (but not reducing obligation to fund any shared upgrades in original allocation) • Clearway suggestion to review cost allocation shift factors and contribution to overload thresholds. Low thresholds result in high interdependency and larger impacts from late stage withdrawals.
- "CRR/ORR: • Non-material changes to POI – yes • Affected system studies identified in Phase 1 – yes • Max feasible cost cap for affected system upgrades in Phase 1 – yes, if realistic to provide • Results of Affected Systems study by Phase 2 – yes • Adverse Study Test at end of Phase 2 – yes • WPMA treatment – generally agree with CRR/ORR comments RWE: • Phase 1

- Affected systems screening and outlet issues screening – yes, if realistic perform • Draft results before decision points – yes • Phase 2 – include prelim affected systems and outlet issues – yes • Phase 2 – Affected systems upgrades identified – yes • Provide at least 5 days for model review – yes • Phase 3 – Affected systems upgrades identified - yes • Incremental financial rights - yes "
- FERC has been clear in all 7 prior FERC-approved RTO transition proposals that the guidance order from 2008 of "careful consideration" for late-stage projects (i.e. SIS in-hand and Facilities Study Agreement signed) is a key consideration. We do not believe that PJM's transition proposal provides sufficient 'careful consideration' for late-stage projects.
- Glad we didn't stop talking as some advocated weeks ago. We are super close to consensus!
- IC Choice requiring through AG2 queues is a must-have for the final PJM proposed transition solution in order to provide the opportunity for late-stage highly certain projects to remain under serial cost allocation rules as long as they are able to post a robust readiness requirement.
- IC Choice!
- If AG2 or later projects are maintained in the queue for processing in a cluster prior to new submissions, they should keep their projects substantially the same - i.e. no increases in MFO/CIR, no fuel changes, no POI moves, etc
- IG Choice!
- In reviewing all FERC-approved transition proposals across 7 other RTOs, FERC has been clear that the guidance order from 2008 of "careful consideration" for late-stage projects (i.e. SIS in-hand and Facilities Study Agreement signed) is a key consideration. We do not believe that PJM's transition proposal provides sufficient 'careful consideration' for late-stage projects.
- In support of ORR Package given its treatment of State Jurisdictional projects relative to PJM's proposal. ORR's proposal would account for State Jurisdictional study delays that are inevitable - a risk that is outside the interconnection customer's control.
- Keep up the good work!
- PJM has raised concerns about complexity in holding on to substantial sums of \$\$\$ for financial readiness requirements as an argument for not requiring higher financial readiness requirements for the transitional serial queue. This concern is relatively insignificant compared to the benefit of culling the queue using an additional financial readiness requirement, and this issue seems entirely surmountable. PJM's own proposal requires PJM to manage a \$4k/MW deposit, so this seems like a problem that should not be driving decisions regarding if/how to allow late-stage projects that have been developed under existing rules for years to continue without disruption/harm from new rules.
- PJM's new proposal adequately balances interests and considerations about timing.
- PJM's new proposal is more acceptable related to transition and readiness, but we maintain that the site control method of measuring the tenure of agreements as 3 years from the date of Phase 3 completion is not tenable or practically feasible, unless the operation term qualifies without the need for actually triggering operations payments. If PJM will not allow the operations period to qualify, then measuring instead from the date of application is realistically the only way to approach this, and we would support making that term longer (e.g., 5 years) in exchange. The uncertainty of the PJM queue process even after reform makes it impossible for developers to guess years in advance what the date of Phase 3 completion is going to be, and requiring every applicant to go back and renegotiate sometimes dozens of agreements would

unnecessarily insert even more uncertainty and risk into projects. We understand the need for site control requirements as a way to demonstrate readiness, but the way to demonstrate this needs to provide us with certainty on dates.

- PJM's proposal of "clean" projects being eligible for Fast Lane processing is a step forward, however, it's not a step far enough forward to address the interest of projects that have been in the queue since 20018. As such, we believe the eligibility of projects for serial processing should be expanded to those that meet a broader \$/MW threshold vs PJM's proposal of \$0/MW
- Regarding the 3 yr site control after signing of the ISA, we would like to see PJM eliminate this requirement or at a minimum, increase the 180 days to 365 days for demonstration of site control.
- Site control requirements needs to be discussed further regarding the timing to meet the industry standard. Like other ISOs, Project should have three years from the COD to come online before IA is terminated. Current rules need to be stay. PJM needs to coordinate new proposal with other ISOs to complete AFS in a timely manner to meet current proposed schedule.
- Some of the proposals contain elements we can support: 1) Reimbursement of NU costs up to a cost cap (CAISO is currently ~\$72k/MW and adjusted by inflation); 2) Having a mechanism to have states/public policy pick up NU cost responsibility; 3) clarifying that continuous site control is required; 4) IC responsible for Affected System Studies (in particular, PJM should not allow delay of a cluster due to incomplete Affected System Studies). Some proposals contain elements we cannot support: 1) security in lieu of site control; 2) PJM assessment of constructability of site (would prefer to retain current guidance); 3) delays in transitioning to routine cluster process.
- Stakeholders clearly stated their desire for IG choice. Adding choice to PJM's latest proposal would check all boxes and allow the transition to progress with maximum support!
- State jurisdictional projects in states with no well established and reliable interconnection process (such as Pennsylvania) should be treated the same as FERC jurisdictional projects during the transition and under the reformed interconnection rules. It is highly discriminatory to leave these projects with no path to access to the wholesale electricity market, which is the case if there is no state level interconnection process and projects are not allowed access to the PJM queue.
- Support ORR's package due to its treatment of State Jurisdictional projects. PJM's treatment of State Jurisdictional projects is overly punitive given that those same projects are exposed to a risk they cannot themselves control - timeliness of State Jurisdictional interconnection studies.
- Thank you for the additional polling
- Thank you!
- We applaud PJM's continued engagement and urge PJM to continue its efforts to bring various interests towards a compromise position. If we had listened to the voices that called for us to stop talking back in October we would not be this close to a substantively consensus proposal. Keep it up!
- We appreciate all of PJM's hard work during this process. We recognize how difficult this process has been and how difficult it is to accommodate everyone's issues.
- We are conceptually aligned on the cluster cost allocation structure for the new interconnection process however, there are significant requirements in each proposal that we cannot support. Issues including but not limited to, site control requirements, affected systems coordination, project site modifications and suspension rights need to be much further developed before we can provide support.

- We believe providing some IC Choice and consideration for AG2 will maximize support and reduce protests at FERC.
- We believe we are very close to a consensus position and appreciate the continued engagement, including this poll!
- We prefer a market mechanism and choice vs. restrictive gating criteria.
- We support any option that allows for the serial processing of AG2 queue
- We urge having the flexibility for equipment changes after the Decision point 3 for situations outside of the developer's control. Some examples of this are: 1. Uncertain equipment supply within the next decade due to supply chain and manufacturing constraints 2. Local content requirements within the new Investment Tax Credit
- We voted for PJM solution package, but we didn't vote for its current transitional proposal. Our comments about transitional proposal are in our response to question 9.
- We would support any option that allows for AG2 serial processing
- We would support any option that allows for transitional serial processing of AG2 queue.