

Scout Clean Energy Comments and Recommendation to PJM's Transition Proposal

12/27/2021

Scout Clean Energy appreciates the opportunity to provide comments to PJM staff and the stakeholder community on PJM Transition Proposal Update associated with PJM Queue reform.

In an effort to develop a First Ready – First Serve Generation Interconnection Process (GIP). PJM must consider changes to its Transmission Proposal, specifically how PJM will process interconnection requests through its Fast Lane process.

PJM re-tool study for interconnection requests in the AE1-AG1 study clusters, to determine if such request can move through the Fast Lane process should take into account, Network Upgrade cost responsibilities for certain Network Upgrades identified in previous study clusters (prior to AE1) for which Facility Studies have been completed, ISA/CSA have been signed, and/or engineering and construction has commenced. In such cases, PJM should not apply a \$5 million Network Upgrade cost threshold, because this will create unnecessary barriers and delays for otherwise Ready-to-Build projects.

- 1) Apply PJM Fast Lane \$5 million threshold for projects that are the first to cause a network upgrade or have cost responsibility towards a Network Upgrade which have been triggered by the interconnection requests in the re-tool study (AE1 – AG1 study clusters).
- 2) Allow projects with cost responsibilities for previously identified (prior to AE1) Network Upgrades (regardless of the cost of such Network Upgrade(s)) to continue in the Fast Lane process with the following requirements:
 - a. Demonstration of Site Control
 - b. An advance payment:
 - i. Twenty (20) percent of the total cost of Network Upgrades in the form of a cash payment; or
 - ii. The total cost of the Network Upgrades in the form of security
 - c. Commercial maturity by demonstrating either:
 - i. An executed PPA or IC is an LSE serving its own load; or
 - ii. Shortlisted for PPA or actively negotiating a PPA; or
 - iii. Commercial Operation achieved

This proposed framework will provide an orderly transition while ensuring “Ready-to-Build” projects move forward through the interconnection process as intended.

Please make these Scout Clean Energy comments available to all participating stakeholders, and feel free to contact me with any questions.

Regards,

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Scout Clean Energy