MEPETF Phase 3 Non-Binding Poll (August 2019)

August 26, 2019
• Poll responses are non-binding and intended to solicit feedback on potential support for key design components

• Total Unique Responders – 17
• Total Companies – 135
1. To be eligible as an Internal TMEP, the project must have the total capital cost lower or equal of:

- 1% for 2 million
- 1% for 5 million
- 13% for 10 million
- 85% for 20 million (aligns with Interregional TMEPs)
- Cannot support this metric for 30 million
- Cannot support this metric for 50 million
- No cost cap

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2. Under the current proposal, benefits are calculated as a number of future years of the average past congestion (Day-Ahead + Balancing), adjusted for outages and/or one-off events, is expected to persist, absent system changes. Number of future years selected for this calculation:
3. Benefits should be calculated based on the average of past X years of past congestion (Day-Ahead + Balancing), adjusted for outages and/or one-off events, which is expected to persist, absent system planned changes, where past X years is:
4. How do you prefer Internal TMEPs interact with the existing market efficiency proposal window?

- Separate window independent of MEP window: 21%
- Share window with MEPs, with criteria (TBD) to carve out priority for TMEPs: 13%
- Procurement model (no solution proposal window): 18%
- Regional TMEPs addressed as exclusions to proposal windows: 48%
- Cannot support this metric: 0%
5. All market efficiency analysis includes evaluation of broader congestion impacts. The Internal TMEP construct should:

- Allow PJM discretion, in consultation with stakeholders (consistent with MEP and interregional TMEP processes)
- Develop bright-line criteria for maximum allowable congestion shift
- Allow no shifted congestion
- Cannot support this metric
6. Consistent with the goals of the Internal TMEP, one of the project criteria is a maximum in-service timeline:

- Within 18 months of award: 1%
- Within 24 months of award: 1%
- Within 30 months of award (~aligns with Interregional TMEPs): 85%
- Within 36 months of award: 1%
- Cannot support this metric: 13%
7. Do you support changing the status quo (adding TMEP type construct to the regional process)?

- Yes: 87%
- No: 13%
8. Do you support establishment of TMEP type construct to the regional process to address persistent past congestion, which is not due to outages and/or one-off events, and/or is not addressed by any system changes (planned upgrades or ISA generators)?
• Interregional TMEP construct has proven reasonable and effective. Exact same construct should be established for Regional TMEP.

• Consider the cost of forecasted efficiency projects against the growing need for asset management projects while considering how to manage overall transmission costs.

• It is unclear why historical congestion identified by PJM's internal model is not showing up in market efficiency analyses. We see TMEP construct as a stop gap measure. Additional work should be done to develop a process that will allow stakeholders to simulate historical congestion.

• Costs for both external and internal TMEP are assigned once based on PJM modeling. PJM should update the cost assignments every 3 years to reflect changing beneficiaries from these projects.