

Exelon Comments – June 20, 2012

(c) The Office of the Interconnection shall provide notice to stakeholders of a 120-day window in which the Office of the Interconnection will accept proposals for potential Long-lead Projects to address the posted violations, system conditions, economic constraints, [or Public Policy Requirements **in accordance with the State Agreement Approach**]. Proposals for Long-lead Projects must contain at a minimum the following information: (i) name and address of the **sponsor**; (ii) sponsor's technical and engineering qualifications and demonstrated experience to **site**, develop, construct, maintain, and operate transmission facilities, including a list **or map** of transmission facilities the sponsor previously constructed and maintained; (iii) **description of the proposed Long-lead Project such as** location of proposed Long-lead Project, including source and sink **and any intermediate points, and all other necessary facilities**; (iv) relevant engineering **data of the proposed project or projects for a specific violation and simulation results demonstrating the proposed solutions to violations defined in studies** as described in the PJM **Manuals**; (v) **a description of necessary regulatory approvals including but not limited to whether or not the sponsor needs to obtain state certification and if so, the proposed timing to get such approval, the estimated amount of property the sponsor needs to obtain and the sponsor's plan for obtaining such property**; (vi) cost estimates and analyses as described in the PJM Manuals; (vii) demonstration of the sponsor's ability to finance the Long-lead Project **or demonstration of sponsor's compliance with Attachment Q of the Tariff**; (viii) demonstration of sponsor's capability for cost containment, schedule-keeping and other advantages the sponsor may have to build the proposed Long-lead Project, including any binding agreement by the sponsor

Comment [A1]: There needs to be a threshold discussion as to the meaning of the term 'sponsor.' Does this refer to the specific corporate entity that will be the owner of the facility or is it broader? This comment goes for this section and subsection (f) for making the designation determination. What if a single purpose entity? Does PJM need to know information on upstream ownership at this stage? If this is a joint venture, it would be important to know the owners.

Comment [A2]: Isn't more needed such as other facilities that are needed? For example, a new line could require upgrades on the underlying system? Shouldn't all of that be included in the description of the project?

Comment [A3]: Data required needs to be codified. For example, does PJM need to know estimated zero sequence impedance data at this stage? Does data on reactive devices need to be specified? What data is needed for DC facilities?

Comment [A4]: What about LD and GD tests which only PJM can perform? What are the expectations for sponsors performing these type of studies? If they are required, will PJM make its methodology or a test methodology available to others?

Comment [A5]: Need to have some idea of what these will be. Power flow and where needed PROMOD-type studies. Will fault studies and stability studies be required at the proposal stage?

to accept a cost cap and (viii) any additional reports or information the Office of the Interconnection determines are reasonably necessary to evaluate the Long-lead Project proposal pursuant to the criteria set forth in Subsection 1.5.8(e) or the sponsor's qualifications pursuant to the criteria set forth in Subsection 1.5.8(f). If the Office of the Interconnection determines any of the information provided in a proposal is deficient or requests additional reports or information, sponsor shall provide the necessary information within [10] business days, or other reasonable time period as determined by the Office of the Interconnection, of receipt of notification of deficiency and/or request for additional reports or information. *[More detail regarding sponsor qualification requirements is being developed for discussion]*