

# Stakeholder Q & A



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# Tariff Applicability (Jurisdiction)

### When is screens process applicable? When you do/don't respect EDC timeline?

PJM Tariff processes and timelines (including Attachment Y) only apply when an interconnection is within the jurisdiction of FERC / PJM's Tariff.

The interconnection process covers two aspects:

1) Physical Interconnection

- PJM Tariff process when FERC jurisdictional

- non-FERC entity's process when non-FERC jurisdictional

2) Post-interconnection sales

- ISA when 1) above is FERC jurisdictional

- WMPA when 1) above is non-FERC jurisdictional

- no PJM agreement when not making wholesale sales



### Point of Interconnection – Tariff defined terms

**Point of Interconnection:** shall mean the point or points, shown in the appropriate appendix to the Interconnection Service Agreement and the Interconnection Construction Service Agreement, where the Customer Interconnection Facilities interconnect with the Transmission Owner Interconnection Facilities or the Transmission System.

Transmission Owner Interconnection Facilities: shall mean all Interconnection Facilities that are not Customer Interconnection Facilities and that, after the transfer under Section 5.5 of Appendix 2 to Attachment P of the PJM Tariff to the Interconnected Transmission Owner of title to any Transmission Owner Interconnection Facilities that the Interconnection Customer constructed, are owned, controlled, operated and maintained by the Interconnected Transmission Owner on the Interconnected Transmission Owner's side of the Point of Interconnection identified in appendices to the Interconnection Service Agreement and to the Interconnection Construction Service Agreement, including any modifications, additions or upgrades made to such facilities and equipment, that are necessary to physically and electrically interconnect the Customer Facility with the Transmission System or interconnected distribution facilities.

**Transmission System:** shall mean the facilities controlled or operated by the Transmission Provider within the PJM Region that are used to provide transmission service under Tariff, Part II and Part III.

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### Point of Interconnection – Tariff defined terms

**Transmission Owner:** shall mean each entity that owns, leases or otherwise has a possessory interest in facilities used for the transmission of electric energy in interstate commerce <u>under the Tariff</u>. The Transmission Owners are listed in Tariff, Attachment L.

Interconnected Transmission Owner: shall mean the Transmission Owner to whose transmission facilities or distribution facilities Customer Interconnection Facilities are, or as the case may be, a Customer Facility is, being directly connected. When used in an Interconnection Construction Service Agreement, the term may refer to a Transmission Owner whose facilities must be upgraded pursuant to the Facilities Study, but whose facilities are not directly interconnected with those of the Interconnection Customer.

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### Point of Interconnection

#### Should POI be at distribution voltage?

Yes, if the distribution being interconnected to is/or will be automatically jurisdictional under PJM Tariff.

#### How should POI be defined?

As defined in the PJM Tariff.

#### Can you provide clarity on status quo?

When connecting to a PJM TO or PJM TO EDC, the POI is where the customer facilities and PJM TO/EDC facilities change ownership.

When connecting to an non-FERC entity, the POI is where the is where the non-FERC entity's facilities and PJM TO/EDC facilities change ownership. A point of common coupling is identified where the customer facilities change ownership with the non-FERC entity.



## **Jurisdictional Determination**

#### How is state vs federal jurisdiction determination on a distribution circuit made?

- Prior wholesale generation sales along the path from a POI to the Transmission System at the time the interconnection request is made; OR
- a FERC Qualifying Facility (QF) requesting to connect to a PJM TO EDC.

#### Jurisdictional test for behind-the-meter projects:

DR transactions (e.g. BTM activities) are load reduction or modification and are not wholesale generation transactions for interconnection purposes.