

Supporters of Gen Tie Friendly Amendment

Interconnection Process Reform

PJM Markets & Reliability Committee

April 27, 2022

Purpose of Friendly Amendment

- **Summary: It has come to our attention that our PC approved INTx Reform package includes gen tie site control of 100% at decision point 3. Amendment is to replace 100% with 75% instead**
- **Since the PC approval, we have learned that 100% has rightly been deemed unreasonable by FERC and likely to be rejected again.** Gen ties require permits that take longer and given this similar fact pattern, FERC has rejected 100% and approved SPP, MISO at 75%
- Current PJM INTx Reform package proposal
 - 50% at decision point 1
 - 100% at decision point 3
- We recognize that the full 100% can be pushed at max to 6 months after executing the ISA. However, situations including a railroad or water crossing permit often require an agency approval/permit and take longer and therefore the 100% should be replaced with 75%

FERC precedent in MISO, SPP supports 75%, not 100%

d. Commission Determination

99. We accept MISO's proposal, subject to condition, and direct MISO, in its compliance filing to be submitted within 60 days of the date of this order, to submit Tariff revisions that: (1) reduce the site control requirement to 75 percent from 100 percent; and (2) insert Tariff language as proposed in its answer, as discussed above.

On the first issue, we agree with MidAmerican that obtaining 100 percent site control may be challenging for a developer that must control numerous small parcels of land. We find that a 75 percent threshold allows for both enough certainty that the developer plans to complete the project and for the flexibility needed by the developer to accurately site its construction. On the second issue, we find that it would be unjust and unreasonable to require site control at a stage of the interconnection process that would be in conflict with state easement requirements. The Tariff language MISO proposes in its answer allows for the flexibility developers need to meet varying state regulatory obligations. As MISO is a large, multi-state RTO, we find that this type of flexibility can allow developers in different regulatory environments to meet both MISO's requirements and those of their home states. Accordingly, we direct MISO, in its compliance filing to be submitted within 60 days of the date of this order to submit such Tariff revisions.

Amendment: 75% gen tie site control at decision point 3

Such site control evidence shall cover ~~100%~~ 75% of the linear distance for the identified required Interconnection Facilities associated with a New Service Request.

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Contacts

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