

## Planning Eligibility Criteria

PJM has established a process in which the study of the generation seeking to pseudo-tie to PJM requires the review of the transmission planning studies, for that portion of the study conducted outside of the PJM footprint, as well as providing assistance to the entity seeking to pseudo-tie that generation in the event that the transmission planning studies are not approved as sufficient. The review of these studies conducted outside of PJM's footprint, by PJM, will allow PJM to determine if the studies performed will meet, are similar to, or exceed the planning criteria and deliverability requirements associated with the studies of internal generation seeking to connect directly to the PJM footprint. ~~The requirement to review these studies conducted outside of the PJM footprint allows PJM to determine if that generation seeking to pseudo-tie to PJM is similar in its deliverability, when comparing to the generation directly connected to the PJM footprint, as it relates to the criteria used to test the system and the extent to which the system is reinforced for the deliverability of that generation and the system surrounding that generation.~~ The ~~initial~~ study of generation inside the PJM footprint is conducted under general study procedures as outlined in PJM Manual 14A, under the feasibility and system impact study requirements of sections 2.1.6 and 2.2.24.2 and 4.3, as well as the general study analysis procedures as outlined in Section C.7C.3 of Attachment C (Deliverability of Generation), and Attachment G (PJM Stability, Short Circuit and Special RTEP Practices and Procedures) of PJM Manual 14B. ~~Ongoing study requirements for the study of generation in the PJM footprint must be maintained under these same standards as is conducted in the annual RTEP studies.~~

Any entity seeking to pseudo-tie a generation resource to PJM may consult with PJM to review the criteria to be utilized in the transmission planning studies which may be performed, by entities outside of PJM during the conduct of required transmission service studies, in order to allow PJM to provide comment as to the potential need for additional study beyond those transmission service studies. In order to allow PJM to conduct this evaluation, the entity seeking to pseudo-tie to PJM shall provide to PJM the criteria requirements used to both study the individual generation to be pseudo-tied to PJM as well as provide the criteria which shall be used on an on-going basis to study the system surrounding that generation. This will allow PJM to evaluate both the current process for study as well as that process which may be used to continue to ensure the system is reinforced appropriately.

Alternately, if the transmission service studies have already been completed, the entity seeking to pseudo-tie to PJM may provide the study reports which documented the studies performed to grant the transmission service on those systems outside of PJM. PJM will review these studies to determine if other studies are required in order to allow certification of that initial study. This review will ensure that the study criterion used meets, is similar to, or exceeds the requirements associated with the studies of generation seeking to connect to the PJM footprint. The entity seeking to pseudo-tie to PJM must also provide the criteria which shall be used on an on-going basis to study the system surrounding that generation.

If the studies conducted, or that will be conducted, to allow the external Transmission Service Providers/Balancing Authority to grant transmission service to the entity seeking to pseudo-tie to PJM, as well as the studies conducted which will examine the system surrounding the generation on an on-going basis, meet the PJM transmission planning criteria requirements, then no additional work will be required to meet the transmission planning requirements associated with the process to pseudo-tie generation to PJM and PJM will provide certification of this. If the studies which were conducted, or that will be conducted, do not meet PJM criteria, then PJM shall delineate what the deficiencies are, ~~such that if the deficiencies are alleviated, then PJM will provide certification. If the studies which were conducted, or that will be conducted, do not meet the PJM criteria requirements, and~~ the entity seeking

to pseudo-tie generation to PJM will be required to engage a consultant to perform studies to ensure that all studies, taken together, can be assured as meeting the PJM criteria requirements. PJM will not require performance of duplicate studies in the event that additional studies are to be performed by a consultant.

The entity wishing to pseudo-tie to PJM should also understand that, beyond any initial studies to verify that the generation is deliverable to PJM under the same criteria as is used to study existing generation internal to the PJM footprint, the entity seeking to pseudo-tie generation will be required to continue to demonstrate, on an on-going basis, that studies performed on the system surrounding the generation are conducted in a manner such that the PJM transmission planning criteria continues to be used. This will again ensure that the system capabilities are being maintained to be consistent with the system capabilities associated with the generation directly connected to PJM.

In the event that any study conducted to certify the transmission planning requirements of the systems outside of PJM's footprint identifies the need for system reinforcement through documentation of a constraint in the study, the entity seeking to pseudo-tie generation to PJM must complete upgrades as needed to eliminate any constraints identified in those studies.

This will require that the entity seeking to pseudo-tie generation to PJM engage the external Transmission Service Providers/Balancing Authority to complete the required upgrades as well as demonstrate to PJM that those upgrades are completed.

PJM will allow the option to reduce the Pseudo Tie quantity to meet PJM's Planning criteria in order to avoid or reduce the amount of potential transmission upgrades. In the event that the pseudo-tied quantity is reduced due to constraints outside the PJM footprint, the customer must then also reduce the Network External Designated Transmission Service (NEDTS) held in PJM, executing a new agreement, such that the MW quantity for both the deliverable MW outside PJM and the NEDTS provide the same MW quantity. If the customer wishes to retain the energy delivery capability of the previously held quantity associated with the NEDTS, the customer may place a new request for service on the OASIS to retain this capability as PTP service.

This acquisition of PTP service in place of the NEDTS service, by the customer, will allow PJM to continue to permit the customer to exercise transmission service rights, in the form of the PTP service, for the purposes of the customer's facilities participation in the energy market while also recognizing that the NEDTS will allow participation in the PJM capacity market.

Note that PJM's evaluation of the external Transmission Service Providers/Balancing Authority transmission service studies are not requirements associated with any entity exercising the use of that transmission service, but are requirements associated with allowing customers to participate in the PJM capacity market.