

### If you could change one aspect about the interconnection process, what would it be?

#### Responses

Interest	Count	Comment
TO, IC, and DP	23	Agreements
Transmission Owner	20	Agreements
Interconnection Customer	17	changes to move viable projects forward; clarification of overloads and need to push TOs forward; review the speculative queue positions - "stage gate"
Interconnection Customer	16	Improve accuracy and timeliness of information coming out of studies at each phase of the process. Simplify and expedite interconnection requests for small upgrades, including updates, at existing plant sites.
Transmission Owner	15	Close the open PJM Project Queue 2 months earlier to the receipt of interconnection requests, so that there is time to work thru the applications issues, prepare kick-off meetings more efficiently, and to build out the Feasibility Study base case that will be used to study valid project interconnection requests.
Interconnection Customer	11	Improve the quality and certainty of reports leading up to the Facilities Study to prevent any major Facilities Study delays caused by retools.
Interconnection Customer	10	Transparency w/r/t cost allocation
TO, IC, and DP	9	Impose an incrementing cost to 'hang out' in queue and allow shovel ready projects to move ahead in IC process. This will both break the blocking for projects to proceed and prevent excessive re-studies for planners reducing their volumes.
Interconnection Customer	8	Improve the accuracy and timeliness of information coming out of studies at each phase of the process.
Interconnection Customer	8	Schedule, schedule, schedule - we have to process projects on a more expedited basis - we have to remain focused on that outcome

Interconnection Customer	4	<p>This stakeholder recommends comprehensive reforms discussed in our December PJM Presentation. PJM’s Workshop January 29th quantified and reviewed input it received in a clear way. As the next step, we respectfully request that PJM offer a response to this stakeholders specific recommendations, which will help us all better understand the paths forward. To the topic in Question 4 below, we generally think these topics are strong areas to focus but require more breadth within each topic to lead to meaningful reforms. In particular, at the conclusion of PJM’s presentation, several slides are dedicated to “Next Steps”. PJM’s suggested focuses within “Studies”, “Cost Responsibility”, and “Interim Studies” appear to just skim the surface. The slides do not respond to the lion’s share of proposals raised by stakeholders that fell into these categories and ignores the extensive collection of recommendations that fall into other categories. We wanted to be clear that we think PJM is heading in right direction, but more work is needed. We respond “No” in Question 4, because Slides 64—70 of PJM presentation do not capture the breadth and depth of each of these three issues and it feels too early to establish that other topics are not worthy of additional efforts. Thus, if PJM were to expand the breadth of each of these three topics to include stakeholders’ concerns in these categories, we would be more comfortable responding “Yes” to this question. We also request additional discussions to evaluate what other areas can be acted on, especially those that do not require Governing Document changes (such as improvements to communications tools and opening lines of dialogue among PJM, TOs and developers earlier in the process). Unfortunately, as a developer, this stakeholder cannot effectively forecast interconnection study timelines, upgrade costs and construction schedules in PJM in a way that allows for successful coordination of the different parts of project development, including complex state, county, and local permitting, off-take agreements, capacity market timing, and tax credit deadlines, to name a few. The inability of PJM’s transmission owners to produce realistic estimates at the system impact study phase, followed by the multi-year delays in completing facility studies, results in developers guessing at costs and schedules as we solidify plans to build and sell our projects in various markets and to off-takers. The margin of error from SIS to facility study is often 100% in terms of both time and cost, resulting in developers spending millions to carefully prepare a project, only to find their costs and schedules are unworkable based on facility study estimates. For a developer, the only alternative to diligent preparation is to leave our projects in a speculative, immature state and sign ISAs with the hope of bringing the project to fruition later, which results in late stage project cancellations, forfeited security, and queue chum. This result would be no better for the queue at large. Instead, this stakeholder has advocated for a positive, ambitious and coordinated reform set across developer, PJM and TO. Effective reform, increased communication and enforcement of the tariff is needed for effective risk mitigated development. While PJM successfully hits its own study timelines in many cases, PJM posturing as an intermediary between the TOs and ICs is ineffective. Reform is necessary to allow competition in the market and ultimately to bring the least cost power to consumers.</p>
Interconnection Customer	4	<p>We would like to see a cluster decision making process and common schedule in a queue group. Similar type of process as MISO DPP Decision Points, NYISO Class Year Rounds or CAISO Cluster studies. In addition we would to see the bar for site control raised (full layout review for solar with at least 5 acres/MW, 30 acres/MW in wind, BOEM lease for offshore etc)</p>
Transmission Owner	3	<p>Qualification of project - no study of a project should begin until the IC has supplied ALL information necessary (no deficiencies) and a study kick-off meeting has been</p>

		held.
Consulting Firm	2	Reduce duration/complexity of study phases and complete work on time per deadlines
Developer	2	Quicker feasibility study results
Interconnection Customer	2	Shorten the amount of time it takes to perform a Facilities Study. Willing to defer some engineering design work until after execution of ICSCA and/or have cost estimates that are a little less accurate if it would result in vastly accelerated Facilities Study process.
Transmission Owner	2	The interconnection studies and re-studies should be performed more accurately, faster, and with a more predictable schedule. The immediate focus should be on the study timeline, tools, and processes needed to reduce the current backlog and prevent future backlogs.
Academic		Grid cost allocation should be rationalized to contribute better to long-term grid planning and construction
Consumer Advocate		Improve the accuracy and timeliness of information coming out of studies at each phase of the process.
Developer		Stakeholder is supportive of "a new comprehensive FERC planning rule to establish basic guidelines for transmission planning processes to ensure they meet future needs" as described in a paper on pages 9 - 14 by Americans for a Clean Energy Grid dated January 2021.
Distribution Provider		Formalize plans for retail electric service as part of the study process. Memorialize those plans in agreements.
Environmental Non-Profit Organization		Make it easier for nontraditional transmission and interconnection technologies to participate
Interconnection Customer		Accuracy and consistency around timing of delivery of studies
Interconnection Customer		Better accountability for all parties meeting deadlines with quality deliverables.
Interconnection Customer		Combine feasibility and system impact study phase as an one stage.
Interconnection Customer		Completion of studies on time and in accordance with the PJM Interconnection Tariff
Interconnection Customer		Elimination of first driver concept
Interconnection Customer		Expediting the Facility study and executing the LGIA faster
Interconnection Customer		Finish the facility studies on time. Commit to their schedules and milestones. Add staff as needed. Propose TO penalties for failure to meet milestones/metrics.

Interconnection Customer		I would get rid of the Feasibility study or make it options as the results from Feasibility Study are pretty much of no use to the interconnection customer.
Interconnection Customer		Make it more streamlined, faster study results
Interconnection Customer		Removing the concept of a single driver and opening up common use upgrades for shared allocation at the onset
Interconnection Customer		Time to pay deposit
Interconnection Customer		We would like to see PJM significantly reduce the amount of time that projects spend in the Facility Study phase. It currently takes nearly two years after a project is initially submitted before the developer is able to know with certainty the cost of needed Network Upgrades.
Regulator		please note -- I am not advocating for any change. I am simply voting for topics I find most interesting.
Transmission Owner		The existing interconnection queue process allows for developers to refine their proposals by submitting speculative queue projects knowing fully well that only one queue project may go forward, if any. These practices significantly bog down the interconnection queue process and lead to numerous retools, shifts in cost allocation for network upgrades, and uncertainty regarding what network upgrades are needed which negatively impacts later queue projects. PJM should first explore creating, enforcing and refining requirements to end speculative queue project submissions and furthermore pursue a first ready first serve approach to allow queue projects that are ready to move forward to advance accordingly. Although PJM has proposed a few narrowly focused areas for stakeholders to potentially modify the queue process, pursuing the ending of speculative queue project submissions and instituting a first ready first serve approach, will instead improve the overall interconnection queue process.
Transmission Owner		Too much flexibility provided to interconnection customers. The process should be streamlined and better defined.