



PJM Interconnection Reform Deficiency Letter

Jason Connell, Sr. Director
Presented to ISAC
September 29, 2022

BACKGROUND:

PJM Interconnection Reform Filing

- On June 14, 2022, PJM filed its package of Interconnection Reforms with FERC. The package was a result of a successful 18-month stakeholder process that drove strong consensus on the solution.
- PJM requested a response from FERC on October 3, 2022.

FERC issued a deficiency letter on the Interconnection Reform filing on August 30, 2022.
The deficiency covered several areas of the filing:

Transmission Service

- Questions the elimination of penalties in Parts II & III of the Tariff
- Requests further information on interim studies

Site Control

- Seeks clarification on changes to generator lead lines as a result of federal/state permitting requirements
- Requests clarification on the definition of adjacent parcels

Transition

- Asks whether the \$5 million rule includes construction acceleration
- Expresses concern around the size of the first study cycle once the new process is implemented

Questions and concerns do not take issue with the core tenets of the filing.

September 29, 2022

Response filed

November 28, 2022

Due to the deficiency letter, FERC has an additional 60 days to respond by this date

If approved, the timing of the transition will not be affected.

Presenters:

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Interconnection Process Reform Deficiency Filing



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