

Planning Committee - Interconnection Process Workshop #2 – Savion. LLC Comments

Company Submitting Comments: Savion, LLC

Savion, a Green Investment Group portfolio company operating on a stand-alone basis, is one of the largest, most technologically advanced utility-scale solar and energy storage project development companies in the United States. With a growing portfolio of more than 11 GW, Savion’s diverse team provides comprehensive services at each phase of renewable energy project development, from conception through construction. As part of this full-service model, Savion manages all aspects of development for customers, partners, and project host communities. Savion is committed to helping decarbonize the energy grid by replacing electric power generation with renewable sources and delivering cost-competitive electricity to the marketplace. For further information, visit www.savionenergy.com.

General Comments on information presented in Workshop #2

- 1) Discussion on elimination of secondary POI in interconnection request application

The secondary POI is modeled in only the Feasibility Study phase. Dropping the option to provide this detail at the beginning of the process is not expected to provide an overall improvement in process speed or accuracy. In fact, it may result in more GI requests because the IC may file a separate GI request for the eliminated secondary POI.

Furthermore, the duration of Feasibility studies is only three months and the studies are for the most part completed on schedule.

- 2) Socializing NU costs on projects

Making this change would eliminate the benefit of securing a POI with a beneficial FCITC result. Realizing that the NU costs on projects will be socialized, some ICs may be emboldened to file GI requests without performing adequate due diligence. As such, socializing NU cost may increase speculation and number of GI filings.

- 3) Limiting multiple queue filings at a substation.

This issue was addressed by using the same MW reduction criteria for a single filing on multiple queue filings with the same POI. Multiple queue filings at the same POI cannot game the system when they are bounded by PJM’s MW reduction criteria for a single queue filing.

However, there should not be limitation on multiple queue filings at the same substation. Multiple queue filings in the same window and at the same substation, but separate POIs, should be allowed. Supporting reasons include potential engineering design challenges, limitation of transmission line/ cable ratings, filings submitted with different project LLC names that may or may not have the same parent owner, etc.

- 4) Requiring security deposits during the study process.

If the amount of the security deposit is dependent on the project NU, this would have a benefit of clearing the queue of financially marginal projects. Security deposits should never become at-risk unless the Interconnection Customer (IC) has received their first study report in its final form and has access to the study models. This is necessary in order that the IC may make an educated decision to advance to the next study phase.

Security deposits should only be required when cost allocation assignment of the NU is being applied to GI project(s). For example, there is no cost allocation of NU to projects in the Feasibility Study report and as such, security deposits should not be required when going from Feasibility Study phase to SIS phase.

5) Stringent land control requirements.

Full site control should not be required unless its measured simply on an acre/MW requirement. Some level of gen-tie site control, probably 50%, should also be required by Facility Study.

6) Reducing queue window to once per year.

This change would reduce the number of simulations but would not speed up the overall process. In fact, it could be argued that combining all filings into a single annual queue would risk delays of the entire years' projects as opposed to just half.

7) Wholesale change vs. process adjustments

While PJM's process can be improved, a comparison of its processes to those of other RTOs (MISO, SPP, etc.) shows PJM to be relatively favorable and provide stable findings. It is Savion's view that ongoing process improvements that are focused on tangible results in the speed and precision of outcomes is desirable to wholesale process re-design. That being said, there have been substantial delays at the facility study stage in certain regions (delays up to 2 years). We believe some modification at this study stage is necessary. This must include a commitment from PJM and the TOs to perform Facility Studies and issue reports in a timely manner.

PJM Specific Questions for the Upcoming Workshop #3

1) How do you find the process working?

The current process appears to work well at the Feasibility and System Impact Study stages.

2) Where are you experiencing issues?

The primary delays are occurring at the Facility Study stage, which is the point at which Transmission Owners become heavily involved. This is where major changes need to be applied and delivery dates enforced.

3) What are your thoughts on challenges we may face given the trends that PJM laid out in Workshop #1

No Response

- 4) What are your top three objectives when entering the PJM Queue or what would you like any process improvements to do?

Savion holds that process improvements should have a measurable goal of improving both the speed and the precision (or predictability if you will) of results. For instance, say a process modification causes the results to become more sensitive to minor assumption changes. In this case the precision of this modification would be evaluated negatively.