

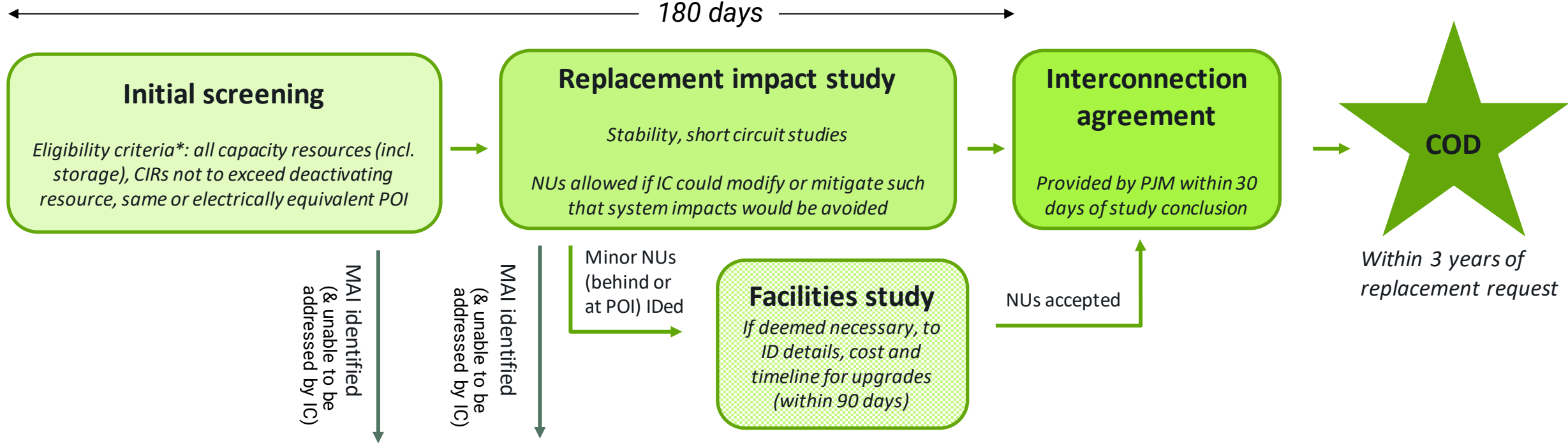
There is broad support at a high level for a generator replacement process in PJM

15 entities across stakeholder groups have expressed support for developing a process, the specifics of which remain to be worked out

- Elevate Renewable Energy*
- EKPC*
- AEP
- Vistra
- E Cubed Policy Associates
- Advanced Energy United
- MN8
- MD OPC
- RMI
- Sierra Club
- NRDC
- Earthjustice
- Sustainable FERC
- CUB IL
- SELC

Generator replacement process flow chart

Initiated upon submission of generator replacement request, occurs as a stand-alone process separate from the queue



Interconnection queue

CIRs = capacity interconnection rights
IC = interconnection customer

MAI = material adverse impact
NU = network upgrade

*Notes: different asset ownership possible (with transfer of CIRs), POIs within same substation (at different breakers or voltage levels) or line connecting to substation are permitted if no MAI

Key questions to resolve

- **How and when to assess MAI**

- Proposal: initial screening would determine whether the requested replacement has an MAI on the system or other queued generators; impact study and facilities study (if needed) would also assess this. Ability for IC to mitigate impact if found, before return to queue.

- **Replacement resource ownership**

- Proposal: replacement resource can be developed by any utility or IPP provided they have requested the transferred CIRs from the retiring resource

- **Eligible POIs for replacement generator**

- Proposal: electrically equivalent POIs within the same substation (but potentially different breakers or voltage levels) or feeder line are permissible, subject to appropriate screens

- **Timing**

- Proposal: 3-year timeline from start (submission of gen replacement request) to COD

- **Staffing and sequencing**

- Proposal: PJM interconnection staff would study generator replacement requests in the order they are received, alongside existing queue clusters. PJM could consider a special team for these interconnection studies, as MISO has established, and/or the interconnecting customers could offer to support consultants to conduct these studies