

Geenex Solar PJM IPRTF Solution Package

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Geenex Solar Overview

- Early to mid-stage developer founded in 2011
- Exclusively focused on PJM market since 2014
- ~ 1,000 MW in operation
 - Operated by Baywa, Dominion, ConEd
- Over 10,000 MW currently in various stages of the PJM queue

Geenex Solution Package

- Transition Mechanism

- Geenex invested heavily early in the PJM AG2 queue, and Geenex chose the specific AG2 project sizes and locations based on the current PJM interconnection process. Moving the Geenex AG2 queue projects to a new PJM interconnection cluster study process would materially harm these projects as Geenex would lose its advantageous queue position along with negating its extensive pre-screening analysis and upfront development work.
- Geenex prefers that its AG2 queue projects be studied under the current PJM interconnection study process (Draft Transition Proposal No. 2) with the following modifications:
 - Start the AG2 Feasibility Studies when the current Facilities Study backlog has been cleared.
 - Only one POI can be studied, which should help minimize PJM's workload.
 - PJM should not start AH1 or AH2 Feasibility studies or hold kickoff calls until AG2 receives its SIS reports.

Geenex Solution Package (cont'd)

- Transition Mechanism (cont'd)

- If Geenex's AG2 queue projects are studied under a new "cluster study" process (Draft Transition Proposal No. 4) the AG2 queue projects should begin the Phase 1 study process by April 2022 and complete the process cycle by 1Q 2024.
 - Investments into AG2 queued projects were made with a 2025 COD target to reach ITC deadline
- AG2 queue projects should be designated as its own cluster study cycle and not be co-mingled or combined with AH1 and AH2 queue projects in a new cluster study cycle.

Geenex Solution Package (cont'd)

■ Study Process

➤ Interconnection Queue Models

- If new overloads are identified in the RTEP case, the costs for such overloads should not be assigned to Interconnection Customers.

➤ Affected Systems

- Affected Systems Studies need to be sequenced.
 - ❖ Phase 1 - PJM should have indication of potential impact of Affected Systems by the end of Phase 1 study.
 - ❖ Phase 2 - PJM should be able to confirm that there is an impact from Affected System owner by the end of Phase 2 along with a cost estimate/schedule if work is identified.
 - ❖ Phase 3 - Affected System Study Report finalized.
- Add kickoff call with Affected System owner before Phase 3 begins if Affected System Study Agreement is necessary in order to review specifics for Interconnection Facilities.
- PJM need to provide more information on its website as to which queue projects are being delayed by Affected Systems issues along with which Affected System/TO is responsible.
- PJM and other ISO/RTOs (MISO, NYISO, DEP and others) need to better align their queue study cycles and timelines in order to more effectively handle Affected Systems issues.

Geenex Solution Package (cont'd)

- Study & Readiness Deposit Levels

- Need to reflect FERC Commission preferences from 7/15/21 ANOPR (paragraph 135)

- “Another possible reform to the current crediting policy is to consider the establishment of a non-refundable fee to be charged for submitting an interconnection request and that is not reimbursable through transmission service credits. Under this approach, an appropriate fee should not be so large that it creates barriers to entry for smaller developers.”

- Readiness Payment 1 (RP1)

- \$500K per project cap (still at \$4,000/MW)

- Refundability % should be higher on all Readiness Payments than what PJM proposed

- At least 75% refundable

- TOs need to provide adequate information to developers to complete their own pre-screening analysis before RP1 is due

- POI, line ratings, bus numbers, etc.

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