

## COALITION STAKEHOLDER PACKAGE

## **PJM IPRTF Solution**

October 7, 2021

## **Executive Summary**

Transitional Serial (TC) & Transitional Cluster (TC) was developed to:

- Provide "transitional equity":
  - Allow Interconnection Customers (ICs) the opportunity to choose between serial network funding or cluster network funding.
  - ICs with no network upgrades or for those pre-SIS projects acceptable anticipated standalone NUs per current serial study methodology won't be forced into a cluster where they may have to fund network upgrades caused by later queued projects.
- Enrollment in TC & TS is closed to non-members of those original queue groups and each project has only one choice.



## **Transitional Serial (TS)**

- Transitional Serial is built on the rules of the current process (Traditional Serial) with certain new "readiness" requirements that are like those in the Cluster Process.
  - Study Deposit
  - Readiness Deposits
  - $\circ$  Site Control Requirements
  - Affected System performance at decision points (if applicable)
- Feasibility Study phase is eliminated
- Suspension of milestone dates limited to one year.
- The above at-risk deposit structure, site control requirements, and reduced study phase, will likely cause immature projects to withdraw or projects in congested area to opt for Transitional Cluster (TC) process.



## **Transitional Serial (TS)**

- Transitional Serial cycles are completed prior to the Transitional Cluster cycle for the same queue group or set of queue groups.
- Transitional Serial is completed prior to start of Phase 3 of subsequent Transitional Cluster
- AE1 AG1 Transitional Serial
  - Readiness Deposit is \$4000/MW
  - Study Deposit
  - Site Control prior to Facility Study/Phase 3 is required
  - Air/Water/Fuel
- AG2 + After Transitional Serial
  - Readiness Deposit is \$4000/MW
  - Study Deposit
  - Application Generation Facility Site Control is required
  - Update Queue Point to one POI
- Similar to cluster process, PJM Transitional Serial (TS) model will be available 45 days prior to decision to enter Transitional Serial
- Allow downsizing according to the current PJM rule before entering TS.



## **Transitional Serial (TS)**





 SD Study Deposit
RD Readiness Deposit
Evidence of Affected System Performance Site Control Air, water, fuel permits Siting Permits (State/local/county/fuel or Milestones in ISA)

## **Transitional Cluster (TC)**

- Transitional Cluster is built on the rules of the proposed Cluster Process.
- Decision Point 0 (D0) Enter Transitional Cluster
  - Readiness Deposit is \$4000/MW
  - Study Deposit
  - Application Generation Facility Site Control
- AE1 AG1 Transitional Cluster
  - Phase 1 is eliminated
- AG2 AH1 Transitional Cluster
  - Update Queue Point to one POI
- PJM Builds Model and provides to ICs for a 30-day due diligence period



## **Transitional Cluster (TC) Process**



## Study Deposits – Transitional Serial & Transitional Cluster Process

- Study Deposit (SD)
  - Covers the study costs
  - Refundable less actual study costs

| Project Size   | Deposit   |   |            |           |   |
|----------------|-----------|---|------------|-----------|---|
| 0–20 MW        | \$75,000  |   |            |           |   |
| > 20 – 50 MW   | \$200,000 | Previously<br>Funded<br>Traditional Study<br>Deposits | Previously |           |   |
| > 50 – 100 MW  | \$250,000 |   | =          | Study Dep |   |
| > 100 – 250 MW | \$300,000 |   | Deposits   |           |   |
| > 250 – 750 MW | \$350,000 |   |            |           | L |
| > 750 MW       | \$400.000 |   |            |           |   |



## **Readiness Deposits – Transitional Serial & Transitional Cluster**

#### • Readiness Deposit (RD)

- Funds committed based upon study results
- Not used to fund studies
- Refunds subject to study phase and adverse test results
- RDs determined at the time they are due; not to be funded or reduced or reduced based upon later project reductions or cost allocations.
- Allocated Upgrades = Allocated Network Upgrades (NU)

| Transitional Serial Process  |               | Transitional Cluster Process     |                                       |  |
|--|---------------|----------------------------------|---------------------------------------|--|
|  | Phase         | Readiness Deposit                | Phase                                 | Readiness Deposit                          |
|  | System Impact | RD1 =\$4000/MW                   | Application                           | RD1 = \$4000/MW                            |
|  | Facility      | RD3s = 20% of Upgrades –<br>RD1* | Phase 2                               | RD2 = 10% of Allocated Upgrades –<br>RD1** |
| * Upgrade – The Total Upgrade cost for the constraints that were caused or |               | Phase 3                          | RD3 = 20% of Allocated Upgrades – RD2 |  |

**RD1** \*\*



\* Upgrade – The Total Upgrade cost for the constraints that were caused or aggravated by the study projects.

\*\* Allocated Upgrade – The total upgrade cost allocation to the cluster projects for the constraints that were caused or aggravated by the study projects.

### Transitional Serial – Study and Readiness Deposits at Risk





## **Comparison of Readiness Deposits – Sample A**

• In the traditional serial process, a 150 MW project in a non-congested area triggered an overload that requires a \$30 million upgrade. Two subsequent projects also contributed to the same upgrade. Each of the three projects contributed the same DFAX to the transmission facility.

|   | Traditional Serial                       | Transitional Serial                     | Transitional Cluster |
|---|--|---|----------------------|
| Initial Study Deposit1 \$25,000 (Month 1-4) |  | \$300,000                               | \$300,000            |
|   | \$42,500 (Month 5)<br>\$60,000 (Month 6) | Sample A Project is better off choosing |                      |
| System Impact Study1                        | \$75,000                                 | Transitional Cluster                    | <b>→</b>             |
| Facility Study1                             | \$100,000                                | Process                                 |                      |
| Readiness Deposit 1 (RD1)                   | \$0                                      | \$600,000                               | \$600,000            |
| Readiness Deposit 2 (RD2)                   | \$0                                      | NA                                      | \$1,000,000          |
| Readiness Deposit 3 (RD3) or (RD3s)         | \$0                                      | \$6,000,000                             | \$2,000,000          |
| Total                                       | \$200,000 - \$235,000                    | \$6,900,000                             | \$3,900,000          |

# Would Many Projects Choose Transitional Serial?

- NO! Much higher at-risk readiness deposits prevent projects from entering Transitional Serial to take chances.
- Readiness deposit is much higher for projects at congested (crowded) regions in the Transitional Serial Process than in the Transitional Cluster Process.
- First-to-cause interconnection customer provides <u>100% of security for entire</u> <u>Network Upgrade</u> when ISA is executed. There is no guarantee subsequent interconnection customers would move forward and provide partial reimbursement.
- When one subsequent project signs ISA, 100% of the security is at risk.
- Increasing Network Upgrade costs accelerate pushing projects in RED ZONE where they would be uncompetitive in the PJM market.
- Consequence of withdrawing is financial loss RD1 deposit and substantial time if project is pushed to next open cluster cycle.



## **Comparison of Initial Deposits**

Sample Project: 150 MW, \$10,000,000 of Allocated Network Upgrades

|                                      | Traditional Serial   | Transitional Serial | Transitional Cluster |
|--------------------------------------|--|---------------------|----------------------|
| Initial Study Deposit <sup>1</sup>   | \$25,000 (Month 1-4)<br>\$42,500 (Month 5)<br>\$60,000 (Month 6) | \$300,000           | \$300,000            |
| System Impact Study <sup>1</sup>     | \$75,000   |                     |                      |
| Facility Study <sup>1</sup>          | \$100,000  |                     |                      |
| Readiness Deposit (RD1) <sup>2</sup> | \$0  | \$600,000           | \$600,000            |
| Total                                | \$200,000 - \$235,000  | \$900,000           | \$900,000            |

<sup>1</sup>Unused study deposits are returned. <sup>2</sup>50% of funds at risk.



#### **HUGE INCREASE FROM TRADITIONAL!!**

380% to 450% increase!!!

## **Comparison of Readiness Deposits**

Sample Project: 150 MW, \$10,000,000 of Allocated Network Upgrades. Network Upgrade is \$30,000,000.

|  | Traditional | Transitional Serial | Transitional Cluster |
|--|-------------|---------------------|----------------------|
| Readiness Deposit 2 (RD2) <sup>1</sup>   | \$0         | NA                  | \$1,000,000          |
| Readiness Deposit 3 (RD3) <sup>2</sup>   | \$0         | NA                  | \$2,000,000          |
| Readiness Deposit 3s (RD3s) <sup>3</sup> | \$0         | \$6,000,000         | NA                   |

<sup>1</sup>Adverse Test – Allocated Network Upgrade Cost and Allocated Affected System Upgrade Costs increase exceeds 25% and \$10,000/MW Increase.

<sup>2</sup>Adverse Test – Allocated Network Upgrade Cost and Allocated Affected System Upgrade Costs increase exceeds 35% and \$15,000/MW Increase.

<sup>3</sup>Adverse Test – Network Upgrade Cost and Allocated Affected System Upgrade Costs increase exceeds 35% and \$15,000/MW Increase.



## Going from no Readiness Deposits up to \$2- \$6 million. HUGE NEW FEES!!

#### **Cost of Allocated Network Upgrades in DOM** for projects with SIS



PROJECTS in AE1 – AG1

Sample Project Size: 150 MW Interconnection Costs: \$9,000,000Allocated Network Upgrades: \$30,000,000Network Upgrade: \$60,000,000RD1 = \$600,000; \$300,000 at risk RD2 = \$3,000,000; \$3,000,000 at risk RD3s = \$12,000,000 = (.2)\*(\$60,000,000);\$12,000,000 at risk

|  | Number of Projects     | Estimate of choices ICs will make                      |
|--|------------------------|--|
|  | 43 (26%) in Clean Zone | Most likely to get through Traditional Process         |
|  | 48 (30%) in middle     | Most likely to choose Transitional Serial              |
|  | 74 (44%) in Red Zone   | Most likely to choose Transitional Cluster or Withdraw |



## **Transitional Serial & Transitional Cluster**

- 1. All ICs in the AD2 cluster or before remain in the Traditional Serial process.
- All ICs in the AE1 AH1 queue can <u>only</u> choose 1) Transitional Serial or 2) Transitional Cluster Process.
- 3. ICs that don't meet the new deposit and site control requirements are withdrawn.



## **Transition Schedule**



Study Deposits and Readiness Deposits are due at end of the Decision Points.



## **Queue Priority**

- Prior to FERC Approval Business as Usual
- 1. AD2 & Before
- 2. Projects from AE2 AG1
- After FERC Approval
  - 1. AE1 AG1 in Transitional Serial
  - 2. AE1 AG1 in Transitional Cluster
  - 3. AG2 in Transitional Serial
  - 4. AG2 in Transitional Cluster
  - 5. AH1 in Transitional Serial
  - 6. AH1 in Transitional Cluster



## **Transitional Deposits**

| Cluster      | D0       | D1       | D2       |
|--------------|----------|----------|----------|
| TS (AE1-AG1) |          |          | SD + RD1 |
| TC (AE1-AG1) | SD + RD1 |          | RD3      |
| TS (AG2)     |          | SD + RD1 | RD3s     |
| TC (AG2)     | SD + RD1 | RD2      | RD3      |
| TS (AH1)     |          | SD + RD1 | RD3s     |
| TC (AH1)     | SD + RD1 | RD2      | RD3      |



## **Other Terms – For Serial and Cluster**

One year Suspension Period

- Transitional Serial, Transitional Cluster, Cluster
- □Inter-Cluster Funding Network Upgrades 5 Year
  - Transitional Serial \$5 M or more (no change)
  - Transitional Cluster, Cluster \$25 M or more

## Site Control

• Move DP1 requirements to DP2



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