



**Generation Interconnection
Feasibility Study Report
for
Queue Project AF2-018
INEZ 138 KV
133.9 MW Capacity / 200 MW Energy**

July 2020

EXHIBIT D

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1 Introduction

This Feasibility Study has been prepared in accordance with the PJM Open Access Transmission Tariff, 36.2, as well as the Feasibility Study Agreement between the Interconnection Customer (IC), and PJM Interconnection, LLC (PJM), Transmission Provider (TP). The Interconnected Transmission Owner (ITO) is AEP.

2 Preface

The intent of the feasibility study is to determine a plan, with ballpark cost and construction time estimates, to connect the subject generation to the PJM network at a location specified by the Interconnection Customer. The Interconnection Customer may request the interconnection of generation as a capacity resource or as an energy-only resource. As a requirement for interconnection, the Interconnection Customer may be responsible for the cost of constructing: (1) Direct Connections, which are new facilities and/or facilities upgrades needed to connect the generator to the PJM network, and (2) Network Upgrades, which are facility additions, or upgrades to existing facilities, that are needed to maintain the reliability of the PJM system.

In some instances a generator interconnection may not be responsible for 100% of the identified network upgrade cost because other transmission network uses, e.g. another generation interconnection, may also contribute to the need for the same network reinforcement. Cost allocation rules for network upgrades can be found in PJM Manual 14A, Attachment B. The possibility of sharing the reinforcement costs with other projects may be identified in the feasibility study, but the actual allocation will be deferred until the impact study is performed.

An Interconnection Customer with a proposed new Customer Facility that has a Maximum Facility Output equal to or greater than 100 MW shall install and maintain, at its expense, phasor measurement units (PMUs). See Section 8.5.3 of Appendix 2 to the Interconnection Service Agreement as well as section 4.3 of PJM Manual 14D for additional information.

The Feasibility Study estimates do not include the feasibility, cost, or time required to obtain property rights and permits for construction of the required facilities. The project developer is responsible for the right of way, real estate, and construction permit issues. For properties currently owned by Transmission Owners, the costs may be included in the study.

3 General

The Interconnection Customer (IC), has proposed a Solar generating facility located in Martin County, Kentucky. The installed facilities will have a total capability of 200 MW with 133.9 MW of this output being recognized by PJM as Capacity. The proposed in-service date for this project is December 01, 2023. This study does not imply a TO commitment to this in-service date.

Queue Number	AF2-018
Project Name	INEZ 138 KV
State	Kentucky
County	Martin
Transmission Owner	AEP
MFO	200
MWE	200
MWC	133.9
Fuel	Solar
Basecase Study Year	2023

Any new service customers who can feasibly be commercially operable prior to June 1st of the basecase study year are required to request interim deliverability analysis.

4 Point of Interconnection

AF2-018 will interconnect with the AEP transmission system via a direct connection to the Inez 138 kV station.

To accommodate the interconnection at the Inez 138 kV substation, the substation will have to be expanded requiring the installation of one (1) 138 kV circuit breaker (see Figure 1). Installation of associated protection and control equipment, 138 kV line risers, SCADA, and 138 kV revenue metering will also be required.

Installation of the generator lead first span exiting the POI station, including the first structure outside the AEP fence, will also be included in AEP's scope. In the case where the generator lead is a single span, the structure in the customer station will be the customer's responsibility.

5 Cost Summary

The AF2-018 project will be responsible for the following costs:

Description	Total Cost
Total Physical Interconnection Costs	\$1,464,000
Total System Network Upgrade Costs	\$0
Total Costs	\$1,464,000

The estimates provided in this report are preliminary in nature, as they were determined without the benefit of detailed engineering studies. Final estimates will require an onsite review and coordination to determine final construction requirements. In addition, Stability analysis will be completed during the Facilities Study stage. It is possible that a need for additional upgrades could be identified by these studies.

This cost excludes a Federal Income Tax Gross Up charges. This tax may or may not be charged based on whether this project meets the eligibility requirements of IRS Notice 88-129. If at a future date it is determined that the Federal Income Tax Gross charge is required, the Transmission Owner shall be reimbursed by the Interconnection Customer for such taxes.

6 Transmission Owner Scope of Work

The total physical interconnection costs is given in the tables below:

6.1 Attachment Facilities

The total preliminary cost estimate for the Attachment work is given in the table below. These costs do not include CIAC Tax Gross-up.

Description	Total Cost
138 kV Revenue Metering	\$376,000
Generator lead first span exiting the POI station, including the first structure outside the fence	\$400,000
Total Attachment Facility Costs	\$776,000

6.2 Direct Connection Cost Estimate

The total preliminary cost estimate for the Direct Connection work is given in the table below. These costs do not include CIAC Tax Gross-up.

Description	Total Cost
Installation of one (1) circuit breaker and associated protection and control equipment, 138 kV line risers, and SCADA equipment	\$643,000
Total Direct Connection Facility Costs	\$643,000

6.3 Non-Direct Connection Cost Estimate

The total preliminary cost estimate for the Non-Direct Connection work is given in the table below. These costs do not include CIAC Tax Gross-up.

Description	Total Cost
Upgrade Line Protections & Controls at the Inez 138 kV Substation	\$45,000
Total Non-Direct Connection Facility Costs	\$45,000

7 Incremental Capacity Transfer Rights (ICTRs)

None

8 Interconnection Customer Requirements

It is understood that the Interconnection Customer (IC) is responsible for all costs associated with this interconnection. The costs above are reimbursable to the Transmission Owner. The cost of the IC's generating plant and the costs for the line connecting the generating plant to the Point of Interconnection are not included in this report; these are assumed to be the IC's responsibility.

The Generation Interconnection Agreement does not in or by itself establish a requirement for the Transmission Owner to provide power for consumption at the developer's facilities. A separate agreement may be reached with the local utility that provides service in the area to ensure that infrastructure is in place to meet this demand and proper metering equipment is installed. It is the responsibility of the developer to contact the local service provider to determine if a local service agreement is required.

1. An Interconnection Customer entering the New Services Queue on or after October 1, 2012 with a proposed new Customer Facility that has a Maximum Facility Output equal to or greater than 100 MW shall install and maintain, at its expense, phasor measurement units (PMUs). See Section 8.5.3 of Appendix 2 to the Interconnection Service Agreement as well as section 4.3 of PJM Manual 14D for additional information.
2. The Interconnection Customer may be required to install and/or pay for metering as necessary to properly track real time output of the facility as well as installing metering which shall be used for billing purposes. See Section 8 of Appendix 2 to the Interconnection Service Agreement as well as Section 4 of PJM Manual 14D for additional information.

9 Revenue Metering and SCADA Requirements

9.1 PJM Requirements

The Interconnection Customer will be required to install equipment necessary to provide Revenue Metering (KWH, KVARH) and real time data (KW, KVAR) for IC's generating Resource. See PJM Manuals M-01 and M-14D, and PJM Tariff Section 8 of Attachment O.

9.2 Meteorological Data Reporting Requirements

Solar generation facilities shall provide the Transmission Provider with site-specific meteorological data including:

- Back Panel temperature (Fahrenheit)
- Irradiance (Watts/meter²)
- Ambient air temperature (Fahrenheit) – (Accepted, not required)
- Wind speed (meters/second) – (Accepted, not required)

- Wind direction (decimal degrees from true north) – (Accepted, not required)

9.3 Interconnected Transmission Owner Requirements

The IC will be required to comply with all Interconnected Transmission Owner's revenue metering requirements for generation interconnection customers located at the following link:

<http://www.pjm.com/planning/design-engineering/to-tech-standards/>

10 Summer Peak - Load Flow Analysis

The Queue Project AF2-018 was evaluated as a 200.0 MW (Capacity 133.9 MW) injection at the Inez 138 kV substation in the AEP area. Project AF2-018 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF2-018 was studied with a commercial probability of 53.0 %. Potential network impacts were as follows:

10.1 Generation Deliverability

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

None

10.2 Multiple Facility Contingency

(Double Circuit Tower Line, Fault with a Stuck Breaker, and Bus Fault contingencies for the full energy output)

None

10.3 Contribution to Previously Identified Overloads

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

None

10.4 Potential Congestion due to Local Energy Deliverability

PJM also studied the delivery of the energy portion of this interconnection request. Any problems identified below are likely to result in operational restrictions to the project under study. The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed below. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.

None

10.5 System Reinforcements - Summer Peak Load Flow

None

11 Light Load Analysis

Light Load Studies (As applicable)

Not applicable

12 Short Circuit Analysis

The following Breakers are overdutied:

To be determined during later study phases.

13 Stability and Reactive Power Assessment

(Summary of the VAR requirements based upon the results of the dynamic studies)

To be determined during later study phases.

14 Affected Systems

14.1 TVA

TVA Impacts to be determined during later study phases (as applicable).

14.2 Duke Energy Progress

Duke Energy Progress Impacts to be determined during later study phases (as applicable).

14.3 MISO

MISO Impacts to be determined during later study phases (as applicable).

14.4 LG&E

LG&E Impacts to be determined during later study phases (as applicable).



**Generation Interconnection
System Impact Study Report**

for

Queue Project AF2-018

INEZ 138 KV

133.9 MW Capacity / 200 MW Energy

July 2021

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1 Introduction

This System Impact Study has been prepared in accordance with the PJM Open Access Transmission Tariff, 205, as well as the System Impact Study Agreement between the Interconnection Customer (IC), and PJM Interconnection, LLC (PJM), Transmission Provider (TP). The Interconnected Transmission Owner (ITO) is AEP.

2 Preface

The intent of the System Impact Study is to determine a plan, with approximate cost and construction time estimates, to connect the subject generation interconnection project to the PJM network at a location specified by the Interconnection Customer. As a requirement for interconnection, the Interconnection Customer may be responsible for the cost of constructing: Network Upgrades, which are facility additions, or upgrades to existing facilities, that are needed to maintain the reliability of the PJM system. All facilities required for interconnection of a generation interconnection project must be designed to meet the technical specifications (on PJM web site) for the appropriate transmission owner.

In some instances an Interconnection Customer may not be responsible for 100% of the identified network upgrade cost because other transmission network uses, e.g. another generation interconnection or merchant transmission upgrade, may also contribute to the need for the same network reinforcement. The possibility of sharing the reinforcement costs with other projects may be identified in the Feasibility Study, but the actual allocation will be deferred until the System Impact Study is performed.

The System Impact Study estimates do not include the feasibility, cost, or time required to obtain property rights and permits for construction of the required facilities. The project developer is responsible for the right of way, real estate, and construction permit issues. For properties currently owned by Transmission Owners, the costs may be included in the study.

The Interconnection Customer seeking to interconnect a wind or solar generation facility shall maintain meteorological data facilities as well as provide that meteorological data which is required per Schedule H to the Interconnection Service Agreement and Section 8 of Manual 14D.

An Interconnection Customer with a proposed new Customer Facility that has a Maximum Facility Output equal to or greater than 100 MW shall install and maintain, at its expense, phasor measurement units (PMUs). See Section 8.5.3 of Appendix 2 to the Interconnection Service Agreement as well as section 4.3 of PJM Manual 14D for additional information.

3 General

The Interconnection Customer (IC), has proposed a Solar generating facility located in Martin County, Kentucky. The installed facilities will have a total capability of 200 MW with 133.9 MW of this output being recognized by PJM as Capacity.

The proposed in-service date for this project is December 01, 2023. This study does not imply a TO commitment to this in-service date.

Queue Number	AF2-018
Project Name	INEZ 138 KV
State	Kentucky
County	Martin
Transmission Owner	AEP
MFO	200
MWE	200
MWC	133.9
Fuel	Solar
Basecase Study Year	2023

Any new service customers who can feasibly be commercially operable prior to June 1st of the basecase study year are required to request interim deliverability analysis.

4 Point of Interconnection

AF2-018 will interconnect with the AEP transmission system via a direct connection to the Inez 138 kV station.

To accommodate the interconnection to the Inez 138 kV station, two (2) new 138 kV circuit breaker will be installed (Attachment 1). Installation of associated protection and control equipment, line risers, SCADA, jumpers, switches, and 138 kV revenue metering will also be required. AEP reserves the right to specify the final acceptable configuration considering design practices, future expansion, and compliance requirements.

AEP will extend one span of 138 kV transmission line for the generation-leads going to the AF2-018 site. Unless this span extends directly from within the AEP station at the POI to the IC collector station structure, AEP will build and own the first transmission line structure outside of the Inez 138 kV station fence to which the AEP and AF2-018 transmission line conductors will attach.

5 Cost Summary

The AF2-018 project will be responsible for the following costs:

Description	Total Cost
Total Physical Interconnection Costs	\$2,351,000
Allocation towards System Network Upgrade Costs*	\$0
Total Costs	\$2,351,000

*As your project progresses through the study process and other projects modify their request or withdraw, then your cost allocation could change.

The estimates provided in this report are preliminary in nature, as they were determined without the benefit of detailed engineering studies. Final estimates will require an on-site review and coordination to determine final construction requirements. In addition, Stability analysis will be completed during the Facilities Study stage. It is possible that a need for additional upgrades could be identified by these studies.

This cost excludes a Federal Income Tax Gross Up charges. This tax may or may not be charged based on whether this project meets the eligibility requirements of IRS Notice 2016-36, 2016-25 I.R.B. (6/20/2016). If at a future date it is determined that the Federal Income Tax Gross charge is required, the Transmission Owner shall be reimbursed by the Interconnection Customer for such taxes.

Note 1: PJM Open Access Transmission Tariff (OATT) section 217.3A outline cost allocation rules. The rules are further clarified in PJM Manual 14A Attachment B. The allocation of costs for a network upgrade will start with the first Queue project to cause the need for the upgrade. Later queue projects will receive cost allocation contingent on their contribution to the violation and are allocated to the queues that have not closed less than 5 years following the execution of the first Interconnection Service Agreement which identifies the need for this upgrade.

Note 2: For customers with System Reinforcements listed: If your present cost allocation to a System Reinforcement indicates \$0, then please be aware that as changes to the interconnection process occur, such as prior queued projects withdrawing from the queue, reducing in size, etc, the cost responsibilities can change and a cost allocation may be assigned to your project. In addition, although your present cost allocation to a System Reinforcement is presently \$0, your project may need this system reinforcement completed to be deliverable to the PJM system. If your project comes into service prior to completion of the system reinforcement, an interim deliverability study for your project will be required.

6 Transmission Owner Scope of Work

The total physical interconnection costs is given in the table below:

6.1 Attachment Facilities

The total preliminary cost estimate for the Attachment work is given in the table below. These costs do not include CIAC Tax Gross-up.

Description	Total Cost
138 kV Revenue Metering	\$376,000
Generator lead first span exiting the POI station, including the first structure outside the fence	\$400,000
Total Attachment Facility Costs	\$776,000

6.2 Direct Connection Cost Estimate

The total preliminary cost estimate for the Direct Connection work is given in the table below. These costs do not include CIAC Tax Gross-up.

Description	Total Cost
Two (2) new 138 kV circuit breakers will be installed at the Inez 138 kV station. Installation of associated protection and control equipment, 138 kV line risers, and SCADA will also be required.	\$1,530,000
Total Direct Connection Facility Costs	\$1,530,000

6.3 Non-Direct Connection Cost Estimate

The total preliminary cost estimate for the Non-Direct Connection work is given in the table below. These costs do not include CIAC Tax Gross-up.

Description	Total Cost
Review line protection and control settings at the Inez 138 kV station	\$45,000
Total Non-Direct Connection Facility Costs	\$45,000

7 Transmission Owner Analysis

AEP conducted load flow analysis and identify the overloads below for the Sub-Transmission:

Overloaded Element	CONTINGENCY	Rating MVA	PRE PROJECT LOADING %	POST PROJECT LOADING %	Queue Contributing to Overload	Overload for Capacity Portion	Overload for Energy Portion	Reinforcement	TO Comments
Pevler – Massey SS 69kV	Loss of Beaver Transformer or Beaver Creek – Morgan Fork 138kV line paired with the loss of Big Sandy – Thelma 138kV line	73	87	100	AF1-130	No	Yes	1)Curtail the generation to mitigate the overload OR 2) Rebuild/Reconductor 3.05 miles of ACSR ~ 336.4 ~ 18/1 ~ MERLIN 69kV conductor	The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in reinforcement project section. With a Transmission Interconnection Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.
Pevler – Massey SS 69kV	Loss of Big Sandy – Thelma 138kV line paired with Beaver Transformer or Beaver Creek – Morgan Fork 138kV line	73	100	105	AF1-162	Yes	Yes	1)Curtail the generation to mitigate the overload OR 2) Rebuild/Reconductor 3.05 miles of ACSR ~ 336.4 ~ 18/1 ~ MERLIN 69kV conductor	The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in reinforcement project section. With a Transmission Interconnection Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.
Pevler – Massey SS 69kV	Loss of Beaver Transformer or Beaver Creek – Morgan Fork 138kV line paired with the loss of Big Sandy – Thelma 138kV line	73	105	117	AF2-018	Yes	Yes	1)Curtail the generation to mitigate the overload OR 2) Rebuild/Reconductor 3.05 miles of ACSR ~ 336.4 ~ 18/1 ~ MERLIN 69kV conductor	The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in reinforcement project section. With a Transmission Interconnection Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.

8 Schedule

It is anticipated that the time between receipt of executed Agreements and Commercial Operation may range from 12 to 18 months if no line work is required. If line work is required, construction time would generally be between 24 to 36 months after Agreement execution.

9 Interconnection Customer Requirements

It is understood that the Interconnection Customer (IC) is responsible for all costs associated with this interconnection. The costs above are reimbursable to the Transmission Owner. The cost of the IC's generating plant and the costs for the line connecting the generating plant to the Point of Interconnection are not included in this report; these are assumed to be the IC's responsibility.

The Generation Interconnection Agreement does not in or by itself establish a requirement for the Transmission Owner to provide power for consumption at the developer's facilities. A separate agreement may be reached with the local utility that provides service in the area to ensure that infrastructure is in place

to meet this demand and proper metering equipment is installed. It is the responsibility of the developer to contact the local service provider to determine if a local service agreement is required.

1. An Interconnection Customer entering the New Services Queue on or after October 1, 2012 with a proposed new Customer Facility that has a Maximum Facility Output equal to or greater than 100 MW shall install and maintain, at its expense, phasor measurement units (PMUs). See Section 8.5.3 of Appendix 2 to the Interconnection Service Agreement as well as section 4.3 of PJM Manual 14D for additional information.
2. The Interconnection Customer may be required to install and/or pay for metering as necessary to properly track real time output of the facility as well as installing metering which shall be used for billing purposes. See Section 8 of Appendix 2 to the Interconnection Service Agreement as well as Section 4 of PJM Manual 14D for additional information.

10 Revenue Metering and SCADA Requirements

10.1 PJM Requirements

The Interconnection Customer will be required to install equipment necessary to provide Revenue Metering (KWH, KVARH) and real time data (KW, KVAR) for IC's generating Resource. See PJM Manuals M-01 and M-14D, and PJM Tariff Section 8 of Attachment O.

10.2 Meteorological Data Reporting Requirements

The solar generation facility shall provide the Transmission Provider with site-specific meteorological data including:

- Back Panel temperature (Fahrenheit) - (Required for plants with Maximum Facility Output of 3 MW or higher)
- Irradiance (Watts/meter²) - (Required for plants with Maximum Facility Output of 3 MW or higher)
- Ambient air temperature (Fahrenheit) - (Accepted, not required)
- Wind speed (meters/second) - (Accepted, not required)
- Wind direction (decimal degrees from true north) - (Accepted, not required)

10.3 Interconnected Transmission Owner Requirements

The IC will be required to comply with all Interconnected Transmission Owner's revenue metering requirements for generation interconnection customers located at the following link:

<http://www.pjm.com/planning/design-engineering/to-tech-standards/>

11 Summer Peak Analysis

The Queue Project AF2-018 was evaluated as a 200.0 MW (Capacity 133.9 MW) injection at the Inez 138 kV substation in the AEP area. Project AF2-018 was evaluated for compliance with applicable reliability planning criteria (PJM, NERC, NERC Regional Reliability Councils, and Transmission Owners). Project AF2-018 was studied with a commercial probability of 100.0 %. Potential network impacts were as follows:

11.1 Generation Deliverability

(Single or N-1 contingencies for the Capacity portion only of the interconnection)

None

11.2 Multiple Facility Contingency

(Double Circuit Tower Line, Fault with a Stuck Breaker, and Bus Fault contingencies for the full energy output)

None

11.3 Contribution to Previously Identified Overloads

(This project contributes to the following contingency overloads, i.e. "Network Impacts", identified for earlier generation or transmission interconnection projects in the PJM Queue)

None

11.4 Steady-State Voltage Requirements

None

11.5 Potential Congestion due to Local Energy Deliverability

PJM also studied the delivery of the energy portion of this interconnection request. Any problems identified below are likely to result in operational restrictions to the project under study. The developer can proceed with network upgrades to eliminate the operational restriction at their discretion by submitting a Merchant Transmission Interconnection request.

Note: Only the most severely overloaded conditions are listed below. There is no guarantee of full delivery of energy for this project by fixing only the conditions listed in this section. With a Transmission Interconnection Request, a subsequent analysis will be performed which shall study all overload conditions associated with the overloaded element(s) identified.

None

11.6 System Reinforcements

ID	Idx	Facility	Upgrade Description	Cost	Cost Allocated to AF2-018	Upgrade Number
			TOTAL COST	\$0	\$0	

Note : For customers with System Reinforcements listed: If your present cost allocation to a System Reinforcement indicates \$0, then please be aware that as changes to the interconnection process occur, such as prior queued projects withdrawing from the queue, reducing in size, etc, the cost responsibilities can change and a cost allocation may be assigned to your project. In addition, although your present cost allocation to a System Reinforcement is presently \$0, your project may need this system reinforcement completed to be deliverable to the PJM system. If your project comes into service prior to completion of the system reinforcement, an interim deliverability study for your project will be required.

12 Light Load Analysis

Not Applicable.

13 Short Circuit Analysis

The following Breakers are overdutied:

None.

14 Stability and Reactive Power

(Summary of the VAR requirements based upon the results of the dynamic studies)

To be determined in the Facilities Study Phase.

15 Affected Systems

15.1 TVA

TVA Impacts to be determined during later study phases (as applicable).

15.2 Duke Energy Progress

Duke Energy Progress Impacts to be determined during later study phases (as applicable).

15.3 MISO

MISO Impacts to be determined during later study phases (as applicable).

15.4 LG&E

LG&E Impacts to be determined during later study phases (as applicable).

16 Attachment 1: One Line Diagram and Project Site Location



