

National Grid Renewables (NG Renewables) appreciates the efforts of PJM and all stakeholders to move the transition proposal to its current form. We believe the current PJM proposal incorporates stakeholders inputs to reach the consensus (CBIR process).

However, the goal of this task force is to develop revisions to effectuate meaningful queue reform. That goal is ultimately achieved by implementing the new, steady state generator interconnection process in a timely manner as possible. To accomplish this, the current transition proposal can be improved to shorten the transition timeframe by approximately 6-8 months.

To accomplish this NG Renewables recommends making the following changes:

- 1) “Grandfathered” sequencing process scope - revert back to limiting eligibility to legacy projects with zero impacts – **see top line in attached chart**
- 2) If (1) is accepted, then the risk of model changes between the grandfathering sequencing process and transition cycle 1 should be minimal and the transition cycle 1 can begin earlier/shifted to the left to execute concurrently with the grandfathering sequence processing – **see second line / transition cycle 1 in the attached chart**
- 3) New Process Cycle 1 Scope – the scope of the first cycle under the new process should include all projects from AG2 forward – AG2 and AH1 should not be part of an independent queue in the transition sequencing to move to the new cycle – the goal of this entire exercise is to move to the new process as soon as possible / processing of AG2/AH1 queues has not commenced and therefore no rights, costs or expectations under the current/effective GI rules are in place and these projects should be moved to Cycle 1 of the new process to facilitate meaningful queue reform – this first cycle under the new process would be moved to the left in line with the shift of the transition cycle in line 2 in the attached chart - **see third line / Cycle 1 new process in the attached chart**
- 4) Cycle 2 of the new process would also be shifted to the left in line with the shifts of the transition cluster and cycle 1 of the new process – **see line 4 of the attached chart**
- 5) Meaningful Queue Reform - The above changes to the current proposal will facilitate the initiation of the new process 6-8 months sooner than the current transition proposal enabling cycles 1 and 2 of the new process to begin in early 2024 and 2025 respectively – a process that delays the commencement of the new process beyond these timeframes arguably contravenes the goal of meaningful queue reform – **see overall attached chart compared to the chart that reflects the current transition proposal**

